Green Hill Solar Farm's: *'Outline Decommissioning Statement [Doc Reference: APP/GH7.3]'.*

The above noted document forms part of the Green Hill Solar Farm's application for the proposed solar farm/ BESS development. This document is generalised in content and lacks specific details in areas, particularly the remediation to the agricultural land. These matters, and other factors, are addressed, within the following response. Important issues that stand out from this *'Outline Commissioning Statement'* are as follows:

Section 1.2.1 – *"A Decommissioning Environmental Management Plan [DEMP] [or multiple DEMPs] and Decommissioning Traffic Management Plan [DTMP] will be produced and approved for the Scheme following the appointment of a contractor, prior to the commencement of the decommissioning phase of the Scheme. Approval and implementation of the DEMP and the DTMP will be secured through a Requirement of the DCO."*

Section 2.1.3 – "*The underground cables [33kV, 132kV and 400kV] may be left in situ, depending on which method is likely to have the least environmental impact at the time. Currently, the most environmentally acceptable option is leaving the cables and any ducts in situ, as this avoids disturbance to overlying land and habitats and to neighbouring communities. Alternatively, the cables can be removed by opening the ground at regular intervals and pulling the cable through to the extraction point, avoiding the need to open up the entire length of the cable route. Any cabling removed will be taken to an appropriate facility for recycling".*

Section 2.1.7 – *"The soil is anticipated to have undergone up to 60 years of recovery given that while the Scheme is operational, the land will be used for lower intensity farming practices, such as for sheep grazing or being left fallow. It is therefore expected to be of the same or better quality once decommissioned, as it is at present."*

Section 2.1.8 – "*Where localised soil compaction occurs from the presence of structures such as the substations or the BESS; or the weight of mobile machinery used through construction, operation and decommissioning, management measures are identified to alleviate compaction [e.g., through ploughing and aeration], to maintain soil structure and enable reinstatement of the land to its original use".*

What follows is a rebuttal to the generalised information and the unsubstantiated statements contained within Green Hill Solar Farm's *'Outline Decommissioning Statement [Doc Reference: APP/GH7.3]*'. In doing so, I have referred to Government sponsored reports, research by Universities and eminent Professors.

Response/ rebuttal to claims within Green Hill Solar Farm's *'Outline Decommissioning Statement [Doc Reference: APP/GH7.3]'.*

[1]. Reversion of land back to agricultural use.

Green Hill Solar Farm only provides draft details for the ultimate decommissioning of their installations, which are lacking in scope, along with proposals for the reinstatement of the land,

following the completion of the contract. Green Hill Solar Farm try to give the impression that at the end of the 60 years contract period, the land would immediately be suitable to sustain crops. This is not the case, the land will need treatment to ensure it can revert to growing crops and can a take a number of years before these measures becomes effective. Green Hill Solar Farm do not address how these treatment works will be undertaken. Nor do they provide details on how they will support the landowners during this transition period.

According to the '*Farmer's Weekly*' *"Essentially, it means it is not possible to plough, cultivate, drain, reseed or use fertilisers or soil improvers on land that has not been touched in the past 15 years without first applying for permission."* A licence would be required from Natural England to revert back to agricultural use. The landowners will also lose *'grandfather'* rights for farming subsidies that will necessitate fresh applications, without guarantee of success. Green Hill Solar Farm should be subsidising the landowners for this time-period, after the 60 years term has elapsed, when the landowners could be denied/ delayed licences and subsidies to resume agricultural use.

[2]. Soil health and recovery [Professor Michael Alder's report].

Green Hill Solar Farm make the statement in their '*Outline Decommissioning Statement [Doc Reference: APP/GH7.3].'* that the land utilised for the solar farm*"…is therefore expected to be of the same or better quality once decommissioned, as it is at present"; [section 2.1.7].* This is an unfounded statement not based on any empirical evidence, whereas the accepted evidence is to the contrary.

There are certain key factors that Green Hill Solar Farm overlook in their submission, that are covered by Professor Michael Alder in his *'Soils and Soils Health Under Ground Mounted Solar Panels'* [January 2026] briefing notes for UKSA.

[a]. Ground compaction.

During construction and decommissioning, the former agricultural land will be subject to movement of mechanical equipment that compact the ground under. This results in *"…surface compaction causes caps and in the sub-surface a condition called pans".* The 'cap' is the hardened crust at the surface that blocks the surface pores and restricts water and air movement within the soil. The loss of air and water within the soil leads to slumping and degradation in soil quality.

> *"Reduced percolation due to compacted subsoils will result in ponding, concentrated flow, channelised in-field erosion, surface water runoff, and deposition of sediment, nutrients and organic matter into adjacent surface waters, causing sedimentation or pollution".* ['Best Management Practices: Subsurface compaction' – Canadian research paper}

The effects of subsurface 'caps' and 'pans' have according to Professor Michael Alder's paper, the following detrimental effects, on otherwise, viable agricultural land:

"Compacted soils:

- *are less porous.*
- *have higher bulk densities.*
- *are prone to other forms of soil degradation [e.g., higher erosion rates].*
- *are at greater risk of prolonged anaerobic [saturated] conditions.*

In compacted soils, crop roots:

- *will not readily exploit the rooting zone.*
- *may suffocate.*
- *are at a greater risk of root disease and suffering from nutrient deficiency.*

Soil compaction increases soil strength, which means plant roots must exert greater force to penetrate the compacted layer. Often the roots are not able to break through compacted layers, leading to crop performance issues".

These latter points being pertinent to the condition of the ground following decommissioning. None of these scenarios have been considered by Green Hill Solar Farm in their submissions.

[b]. Depths/ layers of compaction.

Sub-surface compaction also occurs deeper within the soil structure and can create plough 'pans' which are compacted layers that hinder root growth and the absorption of nutrients to maintain healthy soils. These compacted layers are often below the effective ploughing depth of agricultural machinery.

Within Section 2.1.8 of the *'Outline Decommissioning Statement'*, Green Hill Solar Farm, only refer to ploughing as a remediation measure to provide aeration to the soils. Whilst this may address the upper part of the surface crust, or 'cap', ploughing is only effective to the top 300mm of soil, this does not address how they will mitigate the underlying 'pan' of compacted soils. As noted above this layer will be less porous than its original condition and will lead to soil degradation, by soil erosion of the overlying ground.

[c]. Effects on biodiversity.

In a paper entitled *'Solar Panels on Farmland and Their Impact on Soil Diversity'* [Hackett 2024] it states that solar panels can have a significant impact on biodiversity and states that soil carbon levels determine the lands biodiversity value. This research states that plant cover and ground biomass was significantly lower under solar panels. Soil carbon was 9% lower and particulate organic matter 29% lower, it therefore follows that there will be a reduced biodiversity, which is contrary to the impression that Green Hill Solar Farm are trying to portray.

[d]. Loss of microbial activity in compacted ground

Chinese research [Professor Cui LI: 2023] states that the shading by solar panels [4.5m high panels are proposed by Green Hill Solar Farm] has an obvious ecological effect on soils and this effect may extend to the reduction/ loss of soil microbial activities

[e]. Degradation of soil fertility and Italian Governments approach to solar farms.

An Italian study considered soil property change after just seven years of ground mounted solar panels. The conclusion was that soil fertility had degraded, with a significant reduction of water holding capacity under the panels. This study also showed that soil organic matter had dramatically reduced under the panels with a parallel decrease in microbial activity.

In recent years [2024], the Italian Government has halted any further solar farm developments on agricultural land; the main reason is to ensure the preservation of agricultural land, to ensure future security of food production.

The Italian Government representative stated the measure was to *"…put an end to the wild installation of ground-mounted photovoltaics…"* The Government are confident that they will achieve their 'net-zero' target by developing '*brown field'* sites, motorway strips and rooftop developments.

[f]. Greater surface water run-off.
A consequence of the 'cap' effect referenced above is the greater surface water run-off from the compacted ground. This leads to flooding and the loss of soil and the gradual degradation of the ground over the sixty years of the solar farm, with discharge of surface water run-offs and sediments into watercourses.

[g]. Reduction in plant biomass and diversity.
Studies undertaken by [Professor Armstrong et-al] has shown that plant biomass and species diversity was lower under PV arrays. Photosynthesis and net ecosystem exchange was also lower due the shading effect of the panels.

[3]. Government of Wales' report: *'The Impact of Solar Photovoltaic [PV] Sites on Agricultural Soils and Land Quality [Date: March 2023]'*
A report commissioned for the Government of Wales; *'The Impact of Solar Photovoltaic [PV] Sites on Agricultural Soils and Land Quality [Date: March 2023]',* states that it can take years for soils to recover from compaction, and the compaction may be permanent. In one study which involved thirty-two solar farms in England and Wales [Carvolla: 2024] it was found that compaction was 15% higher under solar panels.

Within the Government of Wales' report are a number of troubling conclusions regards solar farm developments, namely:

[a]. Permanent ground compaction.
Recovery of the land: *"It can take many years for soils to recover from compaction and <u>compaction may be permanent.</u> Runoff from panels can result in rivulets, which can lead to soil loss by erosion".* This will ensure that the land will not achieve its previous *'Best and Most Versatile'* [BMV] categorisation.

[b]. Solar farm industry targeting best agricultural land.
The report was commissioned as solar farm developers are actively targeting the Category Class 1 to 3a, of the BMV agricultural lands, with 66% of proposed developments built on our best agricultural lands. Whereas in the early years of these schemes, they were developed on brownfield sites and poorer quality agricultural land.

[c]. Solar Farm UK.
Solar Energy UK advocates on behalf of the solar farm industry, have produced a best practice guidance for the industry, but it fails to address the impact these developments have on the health

and integrity of the soils and agricultural land. Nor do they provide recommendations to the industry on how remediation should be approached at decommissioning stage.

[d]. Water run-off from panels.
Rain run-off from panels: there is likely to be instances of run-off from the solar panels that will result in the compaction of soils at the base of the panels [Professor Choi, et al, 2020]. Over time, rivulets can form along the trailing edge of the panels with potential risk of soil erosion creating rills and gullies across the site.

[e]. Ground consolidation via mechanical plant.
Soil compaction: the main cause of compaction is the compressive forces applied to the soil from the wheels or tracks of mechanical equipment. Hakansson [1985] found that an axle load of 10 tonnes increased soil bulk density to a depth of 500mm. This situation is also referenced above in the 'cap' and 'pan' affect within compacted soils.

> *"Where there is 'industrial compaction' …* [large industrial plant; excavators, etc.]… *the depth of compaction can extend to depths of 1m [Spoor, 2006] and may persist for up to 30 years [Batey, 2009]".*
>
> *"The impact of soil compaction is well documented [Batey, 2009] and crop growth, yield and quality is adversely affected. There are also wider environmental implications relating to water and air quality".*

With Green Hill Solar Farm only considering ploughing as remediation measure of the top 300mm of soil, this will leave compacted ground at lower levels that will result in soil displacement and surface water run-offs, as detailed in Professor Michael Alder's report and confirmed in the report commissioned by the Government of Wales.

[g]. Impact of ground compaction.
Field studies commissioned by the Welsh Government: found extensive evidence of soil compaction including evidence of waterlogging on the surface or in subsurface horizons, an increase in soil strength or bulk density, low visible porosity, poor structural conditions, soil colour and rooting pattern [Batey, 2009].

Over the course of the sixty years life of this development, according to the above-cited report by Prof, Michael Alder and corroborated by others, and despite Green Hill Solar Farm's claims [Section 2.1.6] the land will not be in a *"better quality once decommissioned, as it is at present."* It is more likely that the land will never recover to pre-development classification under the BMV criteria.

[h]. Downgrading of land from BMV status.
Soil droughtiness: where land has not been fully remediated this causes *"…the introduction of un-remediated soil compaction. This could reduce the crop available water of the soil profile, changing the ALC grade in the soil droughtiness assessment and may result in downgrading and /or loss of BMV"* and *"…leading to changes in the available water holding capacity in the subsoil."* As Green Hill Solar

Farm do not appear to be offering the proper remediation measures to restore the land, this will cause the likely permanent downgrading of the land under BMV. This will permanently affect the crop yield.

[4]. Cables remaining in the ground following decommissioning.
The following statement is extracted from Bedford Borough Council's letter to Green Hill Solar Farm dated 18 December 2024:

> *'It is noted that the Authority is not supportive of leaving underground ducting and cables in-situ at the Decommissioning Phase. The ducting and cables contain plastics and metals, which are toxic, and with gradual breakdown have the potential to leach into the surrounding ground and groundwater causing contamination. The Promotor should be obligated to return the Site, Cable Corridor, and possible servitudes within the Public Highways used by the proposed Development, free of such known contamination. It is noted that this approach would be supported by the Town and Country Planning [Environmental Impact Assessment] Regulations 2017 regarding long-term harm'.*

The cabling proposed by Green Hill Solar Farm vary up to 400kV and are therefore classed as high voltage. These cables generally have three copper cores with oil-filled ducts, contained by the outer sheathing. Depending on the soil type, generally high voltage cables will last about 50 years in the ground before degrading.

From my own experience of remediating sites, I have come across many instances of finding degraded and obsolete high voltage cables that are left within the ground. These have contaminated the surrounding ground which was certified and removed to a licensed tip as 'controlled' waste, as defined in the *'Environmental Protection Act: 1990'* and the '*Controlled Waste Regulations: 2012'.*

High levels of copper within the ground due to degraded cables, results in reduced seed germination, stunted growth and reduced ability of crops to utilise photosynthesis for growth. The presence of copper within the ground also compromises biodiversity and enzyme activity leading to reduced soil fertility, which in turn, affects crop yields.

Green Hill Solar Farm state within Section 2.1.3 of their document that leaving the cables in-situ has the least impact on the environment, as it avoids the disturbance of the overlying ground. However, they have not considered the impact of the breakdown and degradation of the cables in the long-term and the detrimental impact on the crop bearing capability of the existing soils.

Green Hill Solar Farm have suggested they can withdraw the cables by excavating access pits and withdrawing the cable from these extraction points, without the need to expose the entire length of cable for removal. It must be insisted that Green Hill Solar Farm undertake these works as part of any decommissioning and return the land to its previous condition, prior to the development.

[5]. Galvanised steel piles.
These are generally 'H' section galvanised steel beams and/ or helical rods that are driven into the ground, up to 2.0m deep, to provide structural support for the solar panels above. These steel sections are generally protected by 'hot dipped' zinc galvanised coating. This zinc coating acts as a sacrificial coating that will corrode before the steel section is affected. Depending on the nature of the ground

it is anticipate that the zinc could last anywhere between 20 to 50 years; i.e. less than the projected 60 years term of the contract.

Plants need a small amount of zinc to aid growth [typically **30–100 mg/kg**], but where the galvanised zinc coating has broken down, through corrosion, it is anticipated that levels will exceed safe levels [**300–700 mg/kg].** In plants and leaves, it triggers toxicity symptoms like stunted growth and yellowing [chlorosis]. With thousands of these piles per hectare this will leave many *'hot spots'* of zinc contamination in the ground, that is likely to migrate through rain/ groundwater.

High levels of zinc can harm soil health by killing beneficial microorganisms and earthworms, which disrupts natural nutrient cycling. From the Welsh Government's research paper… *"Research on agricultural land has shown that zinc in soils diminishes biological activity [Moffett et al, 2003]".*

Northamptonshire's soil chemistry is typically dominated by heavy, poorly draining clay loams, often slightly acidic to non-calcareous in the topsoil, with calcareous, iron-rich [ferruginous] subsoils derived from Jurassic ironstones. The slightly acidic soils will aid the breakdown of the zinc coating to the piles.

Green Hill Solar Farm have acknowledged that the remnants of the steel piles will be removed, but the act of extraction will lead to the mixture of different layers of soils, lowering the classification of the land under the BMV classification system.

[6]. Green Hill Solar Farm's *'Outline Decommissioning Statement'.*

What is evident from Green Hill Solar Farm's *'Outline Decommissioning Statement [Doc Reference: APP/GH7.3]'* is that no consideration has been given to the reinstating the ground back to agricultural use after the sixty years term, which has degraded in quality over that time period.

Green Hill Solar Farm have not produced a *'Environmental Impact Assessment'* that looks at the quality of the existing agricultural ground, nor have they made any proposals on how the ground will be reverted back to its original condition.

Indeed, there is an argument that such a discussion is not relevant, as many believe that at the point a solar farm is ready for decommissioning the site will be classified as *'brown field'* and could be developed in a variety of ways, perhaps for industrial use, or the land reused as a new solar farm. Many believe that a return of the land to agricultural use may be unlikely as the cost for remediation could be astronomical in sixty years hence.

At a time when we import the majority of food requirements and the impact of global warming on our foreign sources, we should be protecting our land for future food production. The loss of this viable agricultural land for a potential sixty years period and the risk that it may not be suitable for use after this period is myopic at the very least.

The fact that Green Hill Solar Farm have stated that the ground will be no worse, or even a better quality, than existing, is misleading at best. At worst, it ignores the available research.

[7]. Risks of insolvency of the Applicant.

According to the Government Office of National Statistics, in the UK, the average life expectancy of a business is eight years. They also state that the likelihood of a business lasting 60 years [for the duration of the contract] is *"…quite low."* Obviously, with Green Hill Solar Farm and Macquarie Bank, there is no knowing how long they will last as a business, but the statistics are not in their favour, particularly in a volatile and fast changing industry such a renewable energy.

In recent weeks, Hive Energy went into administration despite a taxpayer backed £60m loan guarantee. Turnover for its latest accounts in the year to end March 2024 was £7.2m, with an operating loss of £29.4m, booked on disposal of other subsidiaries. Hive Energy are currently seeking a buyer, therefore the viability of its previous developments [Cleve Hill in Kent, for instance] is in doubt. Therefore, it leaves the question, unanswered, will any potential buyer take on board the liability for decommissioning of Hive Energy's previous developments. Will the risk of decommissioning an existing installation be borne by the landowner/ taxpayer?

According to the UKAEA, *"the STEP programme will deliver a UK prototype fusion energy plant, targeting **2040**, and a path to commercial viability of fusion".* In the event of such a breakthrough, much of the current UK renewable technologies will become obsolete. With companies going into administration, or diversifying out of the industry.

Future advances in the renewable energy industry, would result in the existing installations becoming obsolete or financially unviable, in the wake of these new technologies. There is nothing to prevent the parent group from winding-up Green Hill Solar Farm during, or at the end of the operating period, without completing the obligations to decommission the installations. In law, little can be done to prevent this course of action. In the event of these scenarios, the responsibility will fall on the taxpayer/ landowner to decommission the solar farm/ BESS installations. There should be safeguards in place to mitigate such an outcome.

There is also the potential scenario that Green Hill Solar Farm be '*sold-off'* to a third party that would not take on board the obligations imposed on the Applicant. In such cases, where does the responsibility of the decommissioning fall?

Clear legally binding proposals are required from the Parent Company/ Green Hill Solar Farm before any approvals of the scheme. These must be enforceable at the conclusion of the contract and/ or in the event, that Green Hill Solar Farm ceases to exist as a trading entity.

The common business model in the solar farm industry is for an Applicant to get the scheme through the planning process and then to sell-on their interests to an actual Developer. What safeguards are there that the Developer will be bound by the conditions imposed on the Applicant? If Green Hill Solar Farm follows this business model, their parent company will wind-up the former once the sale and transfer of assets to the Developer have been concluded.

To safeguard the taxpayers and landowners, it should be mandatory that Green Hill Solar Farm provide a *'Restoration Bond'* and/ or an escrow account whereby monies can be drawn down to fund the decommissioning of the installations in the event that Green Hill Solar Farm cannot/ will not be in a position to undertake the works themselves.

[8]. BESS battery cells.
From the Applicant's submission, it states that the lithium-ion batteries will need periodic replacement. The battery cells have a short life, varying from eight to thirteen years, which could results in four to five replacements of the batteries during the operational life of the facility.

In a fast developing industry, will the existing equipment become obsolete and require major replacement, i.e. batteries changed from lithium-ion to sodium-iron. Will this lead to further construction activities at a future date. The Applicant does not address either of these matters in their submission.

There is currently a world shortage of recycling centres for the lithium-ion batteries. Current estimates is that it is three times more costly to re-purpose the constituent part of the cells than it does to produce cells with new raw materials [*Briefing Note: Lithium-Ion Battery Energy Storage Systems: January 2025*].

With no viable solution to this matter, this is going to lead to redundant cells being disposed of in landfills, with the environmental risks this poses, with contaminants leaching into the ground.

Green Hill Solar Farm do not address how the BESS installations will be decommissioned and is not covered in the *'Outline Decommissioning Statement [Doc Reference: APP/GH7.3]'.* This critical issue must be addressed by the Green Hill Solar Farm before final decision of the scheme, as much of the batteries and associated equipment will be classed as '*controlled waste'*.

[9]. Flooding [during the lifespan of the development and post decommissioning].
It is stated in preceding sections of this response that compacted ground leads to greater surfaces water run-off. As detailed in the Green Hill Solar Farm's *'Outline Decommissioning Statement'* [Section 2.1.8], they do not propose to mitigate this matter, other than undertaking ploughing, as part of the decommissioning. However, ploughing does not address the underlying layers of compacted ground, known as 'pans'. The movement and vibration of mechanical equipment can consolidate ground down to depths of a metre.

As detailed in the Welsh Government's sponsored research, this ground compaction leads to soil erosion which impact watercourses, not only during the course of the sixty years lifespan of this development, but also post decommissioning. This can result in sediments being deposited in watercourses and increases in flooding events.

There does not seem to be any recognition of the consequences of flooding due to the solar farm development. The Blackmile Lane area of Grendon has been prone to flooding, increasingly in frequency in recent years. Grendon Brook passes through proposed Site F, and is fed by a number of tributaries within the proposed development area.

In years past, these fields have been ploughed for crops, which opens up the clay soil and increases porosity and permeability. However, with the prospect of the solar farm, these fields will become

compacted clay as noted above, which leads to greater surface water and sediment discharges into the streams, including Grendon Brook.

With passing years, ground consolidation increases, exacerbating this problem. Green Hill Solar Farm's statement that they will only undertake ploughing as part of the decommissioning works does need reinstate the ground's original condition. This will lead to increased risk of flooding to Blackmile Lane, for which Green Hill Solar Farm do not provide any mitigation proposals.

According to research by the '*University of Nottingham'*, ploughed fields have greater porosity, than non-tilled ground [16%, compared to 12%, an increase of 33%]. The action of ploughing also opens up the pore sizes within the clay soils [0.84mm/m2, compared to 0.49mm/m2, an increase of 71%], which assists absorption. This is clear evidence that there will be greater surface water discharge, in frequency and intensity into the steams and brooks.

Green Hill Solar Farm does not provide evidence as to how their 'low' flood risk categorisation is calculated as it is contrary to the Environmental Agency's own assessment of Grendon Brook. There is no recognition of the impact of the solar farm development on watercourses, due to surface water run-off and the impact of Green Hill Solar Farm's contractor pumping water from the works into the watercourses.

The writer has communicated these concerns to Green Hill Solar Farm, for which they have never provided a response.

[10]. Compliance post consent.

A robust compliance process is required to monitor commitments and assessments made by the applicant. We cannot see how the councils and statutory bodies will be responsible for ensuring all the commitments are carried out to the required standards. We need a clear list of who is responsible for what, and who will be accountable, and a clear pathway for recourse that does not involve expensive legal costs. The Applicant quotes it will be a criminal offence if they do not adhere to their plans however, who will hold them to task in each area and who will be responsible to challenge any offences?

[11]. Haul roads and compounds.

Green Hill Solar Farm's *'Outline Decommissioning Statement [Doc Reference: APP/GH7.3]'* does not refer to the removal of any site compounds required to facilitate the works. These must be removed, at the time the facility comes on line, with the construction works complete.

At the same time, haul roads must be removed, as the traffic during the operation phase of the works will be occasional visits and therefore much of the temporary roads will no longer be required.

[12]. Conclusions and recommendations.

Within Green Hill Solar Farm's *'Outline Decommissioning Statement [Doc Reference: APP/GH7.3]'* they claim erroneously that the agricultural land at the end of the sixty years contact will be in no worse, or even in a better condition, than before the works commenced. They make this statement without any evidence, or corroboration.

As cited above the likelihood is that the land will likely be permanently compromised by the solar farm and unlikely to regain its previous BMV categorisation. In the long term, this will reduce the area of land that is capable of sustaining agricultural crops, when foreign food sources become increasingly comprised through global warming.

The Italian Government has recognised that it cannot keep losing viable agricultural land to solar farm developments, if left un-checked, the industry target the BMV land. For this reason, the solar farms industry are banned from developing schemes on agricultural land. Yet despite this, the Italian Government is confident that it will still meet its renewable energy generation targets.

This development must be denied consent for the following reasons, pertaining to their inadequate proposals for the decommissioning of the works:

a) Green Hill Solar Farm does not recognise the extent of the remediation works required to reinstate the land to its former use, following the sixty years contract. Nor do they put forward any measures other than ploughing the land.
b) Green Hill Solar Farm does not recognise, nor make proposals, for the any corrective measures for the improvement of the land to sustain future crops; i.e. reinstating its capability to absorb oxygen, or water, or replacing its lost nutrients and to increase the effectiveness of its biomass, that will help it sustain the growth of agricultural crops.
c) Green Hill Solar Farm anticipate that the decommissioning works will take 1 – 2 years to complete. This may be adequate for the removal of the existing installations. However, this does not include time for the remediation of the land, in order for it to sustain growth of crops. This can take a number of years to achieve.
d) Remediation of the land can take a number of years to achieve, yet Green Hill Solar Farm only believes a cursory ploughing is adequate. Green Hill Solar Farm should be providing a programme of works for the remediation, and the support they will offer to the farmers to achieve this objective, over a potential 7-10 years period, following decommissioning.
e) As contained in the Government of Wales report there is a consensus that the land is unlikely to attain its previous ability of sustaining agricultural crops. Will Green Hill Solar Farm compensate the landowners, for future loss of income?
f) Green Hill Solar Farm do not propose any safeguards for the decommissioning of the installations, in the event that they cease trading on, or before, the commencement of the decommissioning works. There should be a '*Restoration Bond*' and/ or escrow account in place, that the landowner can draw on, it the event that Green Hill Solar Farm, cannot/ will not, undertake these works.
g) Green Hill Solar Farm do not make any proposals on preventative measures to control surface water run-offs into watercourses that are increasingly prone to flooding. There is no proposals on how they will prevent sediments migrating into the watercourses. The compacted ground will diminish the land's ability to absorb rainfall. This will lead to ponding/ flooding of the land and result in discharge of surface water and sediments into the watercourses.