Response to Examiner's Questions.

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Purpose	Response to ExQ3 for Green Hill Solar Farm (PINS reference EN010170)

1 Introduction

1.1 This report sets out MKCC's response to ExQ3, issued 18th February 2026, due 24th March 2026.

2 Examiner's Questions

Q3.2.12 Bat surveys

Given the concerns raised at paragraph 4.15 of Milton Keynes City Council's LIR [REP1-169] regarding the adequacy of bat surveys with particular regard to barbastelle bats, should further surveys be required in order to establish any necessary measures to protect the species?

Response: MKCC's main concern centred around Threeshires wood and the commuting corridor identified by SD41 to the south of the ancient woodland. The concern was that the ancient woodland has the potential to support a maternity roost as the number of Barbastelle recorded was substantial for Milton Keynes. During a meeting with the applicant's ecologist on 20th January 2026, the ecologist confirmed no works within 20m of the identified Barbastelle commuting corridor or connected ancient woodland would take place. This buffer is considered adequate to protect Barbastelle if they continue to use the corridor during construction and operation, even in the worst-case scenario (i.e. a maternity roost is present either within the woodland or within trees along the commuting corridor). Whilst it would be beneficial to understand whether a maternity roost is present nearby, it would not be necessary to establish protection measures in Site G if the worst case is assumed. The MKCC Ecologist requested the buffer be made as wide as possible if there was any scope to adjust the positioning of the panels close to the commuting corridor.

Q3.2.15 Effects on barbastelle bat

Milton Keynes City Council [REP3-085] raise significant concern that the adjacent woodland and linking boundary features at Site G are of high importance to barbastelle bats, an Annex II species typically considered very rare nationally. Static bat detector surveys (Figure 9.6.7 Bat Static Detector Locations (Green Hill G)) in Appendix 9.6 Bat Surveys (Revision A) [REP1-047] recorded high levels of barbastelle bat activity at location SD38 on the western boundary of Site G (as set out in the applicant's response to MKC 4.15 of the Applicant's Reponses to Local Impact Report Responses [REP4-018]). Location SD38 is at the end of a small belt of woodland and across the A509 road from the Barslay Spinney ancient woodland and adjoining hedgerow. The Bat Surveys document states that linear features such as hedgerows and small woodland blocks provide bat flight paths and foraging resources. It states that broadleaved woodland offers a high-quality foraging habitat for bats. A tree with a high suitability for roosting bats was recorded (Figure 9.6.14 Bat Ground Level Tree Assessment Results (Green Hill G)) in [REP1-047] in close proximity to location SD38. Trees with moderate suitability for roosting bats were identified in Barslay Spinney and within the Cable Route Corridor (CRC) to the west of the spinney (9.6.19 Bat Ground Level Tree Assessment Results (Cable Route 5 of 5) [REP1-047]. Bat activity surveys were not carried out within the CRC. Work No 5B for the CRC passing west from the A509 road close to location SD38, and adjacent to the Barslay Spinney ancient woodland and a hedgerow to its west, comprises works to lay electrical cables including laying down of access tracks, roads, drainage infrastructure, cable laying, tunnelling, boring and drilling works and temporary construction and decommissioning laydown areas which may include areas of hardstanding, car parking, materials and equipment storage, site and welfare offices and workshops. A temporary haul route would be implemented alongside the cable route (Outline Ecological Protection and Mitigation Strategy (Revision B)) [REP4-010], Section 3.4, which would require the use of HGVs to construct. The CRC would contain no ecological buffers, as set out in the Schedule of Protective Ecological Buffers [APP-095]. As features such as the ancient woodland and adjoining line of hedgerow and trees across the road from location SD38 may provide flight paths and foraging resources for the barbastelle bat, do you consider that the absence of ecological buffers to these features adjacent to the CRC may result in harm to the protected species and relevant habitat?

Response: In the absence of survey work to understand how bats utilise the CRC, it is difficult to accurately predict the impacts which may occur to the protected species in the absence of mitigation. Habitats, however, may be impacted by the proposed works if works such as boring, drilling, tunnelling, laying of hardstanding or tracking of heavy machinery occur within the RPA of habitats such as hedgerows, trees and woodland. Impacts to root systems can kill vegetation and thus, impact the linear connectivity of wildlife corridors. Equally, if lighting is used close to these features, this may impact light sensitive species such as Barbastelle, the worse case being such species avoid the affected areas altogether or abandon any roosts which may be present. Noise, vibration and dust may also have an impact.

In the absence of survey information, if presence of protected species is assumed at a level similar to that identified in Site G, particularly at SD38, it is considered harm to protected species may occur from the proposed works in the absence of mitigation or ecological buffers. Further survey

work to the CRC would be required to inform mitigation or potential licensing requirements if bat roosts in trees were to be affected. Implementation of ecological buffers would be preferred.

Q3.7.4 Statement of Common Ground

In the latest SoCG, Revision A [REP4-031] all Landscape and Visual matters appear to still be 'under discussion' with the position stated as 'the applicant awaits the Council's comments'. Please can you provide an update on the progress of discussions and indicate if it is likely that these will be resolved prior to the close of the Examination.

Response: The requested additional viewpoints for Site G were published 02/03/2026, as well as additional viewpoints as part of the Change 2 application published 18/02/2026, and the additional viewpoint of the PRoW sent by the applicant 18/03/2026 (due to be published at Deadline 6) . The MKCC Landscape Architect has reviewed the documents and updated specific points with the latest draft SoCG (expected to be submitted at Deadline 6). In summary, MKCC continue to object to the inclusion of fields GF9 and GF13, due to their inclusion with the Special Landscape Area. Many of the areas around methodology are agreed, however, the landscape character study Milton Keynes Review of Local Landscape Designations report May 2024, has not been properly considered. In general, comments remain as per the MKCC Local Impact Report. MKCC disagree that the effects on landscape would result in only Moderate / Minor Adverse effects, on areas assessed as special landscape, at Year 15 and at decommissioning. The proposal will permanently remove open views across countryside and Special Landscape Area.