

Previously stated issues still remain unresolved. The applicant has repeatedly and unreasonably chosen to not rectify omissions and undertake assessments that are required to ensure the Environmental Statement is materially complete and meets EIA Regulations.

GLINT AND GLARE

The input data for the cloud cover charts produced by weatherspark.com is explicitly stated on their website as the following: 'All other weather data, including cloud cover, precipitation, wind speed and direction, and solar flux, come from NASA's MERRA-2 Modern-Era Retrospective Analysis. This reanalysis combines a variety of wide-area measurements in a state-of-the-art global meteorological model to reconstruct the hourly history of weather throughout the world on a 50-kilometer grid.'

The applicant states within their Further Responses to Deadline 4 Submissions [REP6-062]: 'The methodology used for predicted cloud cover is "based on a statistical analysis of historical hourly weather reports and model reconstructions from 1 January 1980 to 31 December 2016.'" However, a statistical analysis requires a methodology.

Weatherspark.com have processed the historic hourly data and data from reconstructed models to generate the cloud cover charts showing daily averages using some method. Charts with a description below stating: 'The percentage of time spent in each cloud cover band, categorized by the percentage of the sky covered by clouds.' Weatherspark.com does not explicitly state the method they have used to generate the cloud cover charts from the historic hourly data so aggregation rules, the period over which each value is calculated and any smoothing applied cannot be explicitly verified. The applicant states within their Further Responses to Deadline 4 Submissions [REP6-062] that the methodology stated on the website does not apply to the cloud cover charts but this is not stated on the website and no alternative methodology is provided for the cloud cover charts.

Omissions create uncertainty and incomplete information can lead to different judgements being made. However, the claim that the cloud cover charts show predicted cloud cover is extremely misleading, is not supported by any evidence and raises significant concerns over the reliability of assessments completed.

'Additional floors would be considered where the main living space is located on higher floors i.e. in a block of flats which is not the case for properties in the vicinity of the Scheme.' is stated by the applicant in their Further Responses to Deadline 4 Submissions [REP6-062] but this generic self imposed restriction ignores the actual receptor environment and real world use.

EIA Regulations require a complete assessment of all relevant receptors. Assessing only ground floor receptors and treating them as representative of an entire dwelling does not meet this requirement. Upper floor and roof level rooms will experience different, and typically greater, exposures to the sites compared to ground floor rooms due to their elevation so they must be included within the assessment. This is to ensure all relevant receptors are properly considered and not just the typically least exposed subset. The omission of upper floors and roof level rooms means the Environmental Statement does not contain the information needed to understand the extent and severity of the adverse effects so is therefore materially incomplete.

NOISE AND VIBRATION

The applicant states within their Further Responses to Deadline 4 Submissions [REP6-062]: 'Napier's research provides a reasonable basis for the reduction given the overall context and conservative nature of the assessment.' in relation to second floor bedrooms within the roof. However, the impact on second floor bedrooms within the roof and whether any reduction can be made at all remains unknown as Napier's research did not include them. It is not reasonable to change the conditions used in experiments and apply the same result without this being researched. Second floor bedrooms are a lot higher than 4m and have been omitted from the assessment. Therefore, describing the assessment as 'conservative' is incorrect.

'The identification of the closest dwelling as the most exposed receptor is supported by the acoustic modelling results' is stated within their Further Responses to Deadline 4 Submissions [REP6-062]. However, this is misleading. No acoustic modelling has been undertaken for any dwellings other than those the applicant has selected as 'closest'. Without modelling the full set of potentially affected dwellings, the applicant cannot demonstrate that the chosen receptor is in fact the most exposed. As a result, the statement above is not supported by the modelling presented.

Failure to include second floor bedrooms within the roof renders the following statement within their Further Responses to Deadline 4 Submissions [REP6-062] incredibly misleading: 'the assessment methodology provides a robust and precautionary basis for understanding potential noise impacts. It is designed to ensure that receptors identified as at risk are appropriately considered and that mitigation measures are adequately scoped.'

UK Government guidance for noise and vibration management: environmental permits [REF 1] states: 'If you have made no effort to minimise the uncertainty in your noise impact assessment, then your assessment will not meet the requirements of BS 4142, the potential error will be too large to be acceptable, and we will reject your assessment.' The applicant's use of manufacturers' data can create significant uncertainty, as previously mentioned, and this has not been addressed within Environmental Statement Chapter 14 Noise and Vibration [APP-051].

Penalties will need to be added onto predicted operational noise levels for the characteristics present as dismissing them by professional judgement is unacceptable.

The High Court's recent judgment in *Animal Equality UK v North East Lincolnshire Council & ASL New Clee Limited* (2025) confirms that welfare concerns relating to animals are not excluded from planning by law. Given the proximity of the potential scheme to residential properties, pets will clearly be capable of experiencing welfare impacts and therefore constitute relevant receptors under EIA Regulations. Failure to include welfare impacts on animals, including pets, means the Environmental Statement does not provide the information required by the EIA Regulations.

FLOOD RISK

The applicant states within their Further Responses to Deadline 4 Submissions [REP6-062]: 'the scenario described in the representation whereby flooding could interact with the BESS infrastructure and give rise to secondary hazards is considered unlikely based on the modelled flood extents' is very unlikely to be a valid conclusion as a linked 1D-2D model with up to date data should be used.

It is worth noting that Natural Resources Wales [REF 2] states: 'You should complete a hydrodynamically linked 1D/2D

model' and 'If you model data based on existing surveys, you must confirm there have been no changes since the existing survey data was collected, for instance man-made changes or natural processes' within guidance for developing hydraulic models for flood risk.

MAJOR ACCIDENTS

Minimum safety standards of NFPA (2026) have not been met by the applicant as they have not undertaken a Hazard Mitigation Analysis (HMA) which is a mandatory requirement of NFPA 855 (2026).

Subsequent updates of NFPA 855 strengthened requirements to reflect lessons learned from the 2019 Arizona and 2020 Liverpool BESS incidents. However, communication delays and information gaps that contributed to the 2019 Arizona and 2020 Liverpool BESS incidents are still a credible safety concern and they are not fully resolved by the standard alone.

The applicant has not implemented anything to fill the evidenced critical gap in safety and emergency planning.

CTIF, the International Association of Fire and Rescue Services, reported in March 2026 that senior fire scientists in the UK are warning that risks of lithium-ion battery fires are now outpacing public awareness, regulatory frameworks and traditional firefighting strategies [REF 3]. As previously stated, the applicant unacceptably wants to further add to the risk by situating a BESS within Flood Zones 2 and 3 without a proper assessment.

STANDARD OF PRACTICE

Island Green Power is a separate entity to the applicant, Green Hill Solar Farm Limited. The applicant is not adopting best practices in relation to the development of the solar farm as they have failed to demonstrate that they will ensure the health and safety of the public, animals and wildlife. This raises questions about the extent to which the applicant is committed to following recognised sector standards.

Overall, there remain significant material deficiencies in this project so uncertainty persists, assessments cannot be relied upon and the Environmental Statement is materially incomplete.

REFERENCES

1. <https://www.gov.uk/government/publications/noise-and-vibration-management-environmental-permits/noise-and-vibration-management-environmental-permits#dealing-with-uncertainty>

2. [REDACTED]

3. [REDACTED]