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Sent: Monday, September 28, 2026 09:31

To: Green Hill Solar

Subject: Fw: Response to Secretary of State's Consultation Submissions on Green Hill Solar Farm

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Submissions provided by the applicant are inadequate, omit critical context and continue a pattern of relying on unsubstantiated claims and misleading statements. This approach has been evident throughout the application and significantly increases uncertainty regarding risks to the health and safety of the public, animals and wildlife.

The applicant has completely failed to answer the Secretary of State's Request for Information regarding the 4.3ha of land under the substation and BESS. The only specific scientific evidence they provide on Page 8 of their response [C1-015] relating to soil storage duration is a research paper (Birnbaum et al., 2017) examining soil stored for “up to 10 years.” A 10-year study cannot be extrapolated to 60 years without evidence or proper justification. As a result, the applicant has provided no information whatsoever on the likely condition of the soil after 60 years.

The Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites [REF 1] clearly states: “Soil is a fundamental and ultimately finite resource that fulfils a number of functions and services for society which are central to sustainability”. Failing to address the Secretary of State’s request and relying on results from a 10-year study is wholly inadequate and will highly likely result in the loss of another very valuable resource.

Furthermore, the Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites clearly states: “Mishandling soil can have an adverse effect on its properties – not only fertility and permeability, but also ecological diversity, the performance and visual quality of vegetated areas and recharge of underlying aquifers. Mishandling also increases the risk of flooding and off-site discharges in breach of consents.” Despite the relevance of these impacts to the subsequent Agricultural Land Classification of the sites, the applicant’s submissions do not address these risks nor provide a plan for when soil is mishandled.

The applicant's approach throughout the entire application means that the scale and nature of harm would only become apparent after damage has occurred. This is inconsistent with the precautionary approach required for nationally significant infrastructure projects where risks must be understood, evidenced and mitigated before development is authorised.

In summary, the applicant's submissions do not resolve outstanding concerns nor do they provide evidence required to demonstrate that the impact on soil has been properly understood or mitigated.

REFERENCES

1. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/716510/pb13298-code-of-practice-090910.pdf