

Date: 14 July 2026

Dear Sir/Madam,

Below are the comments of Derbyshire County Council in response to the application for non-material changes relating to Oaklands Farm Solar, EN010122.

There are 7 proposed changes to the parameters of the original DCO consent, which in itself is concerning in the context of a non-material change. Of particular concern is the proposed Change 2 below. This proposes an increase in height of the solar panels from 2.7m to 3.0m and an increase in the depth of the pile foundations from 2m to 3m. The proposed changes are considered individually below.

Change 1 – Work No. 1 (a ground mounted solar photovoltaic generating station) In preparing the detailed design of the solar array, the Applicant has been able to optimise the design by using newer technology. This primarily means the available land can be more effectively utilised to lay out the equipment to maximise efficiency and solar capacity. To realise these optimisations, the Applicant proposes to slightly expand the footprint of work no. 1 in specific areas with three areas removed from work no. 1. The extension of the parameter area for work no. 1 is minimal, resulting in an overall net increase of 3.4% in the parameter area for work no. 1 and the change is therefore non-material.

This change relies upon the revisions proposed in Change 2, seeking an amendment to the extent of solar panel coverage amounting to a 3.4% increase in area. Given that the increase is a small % change and includes the removal of some of the Work No. 1 area, with compensation by marginal extensions in other areas, it is felt that this amendment is indeed non-material. However, the cumulative impact of this change, when considered in relation to the proposed changes 2 to 7, is, on balance, a cumulative material change.

Change 2 – Solar PV Panels In certain locations the maximum height of the solar panels is to be changed from 2.7m to 3m above ground level (“AGL”). The limited areas of where panel heights will be allowed up to 3m AGL is shown in the Solar Panel Heights Parameter Plan at Appendix I of the Design Statement. This is to allow for undulations in the topography of the Site where the dips and slopes of the Site results in the solar panels technically exceeding the existing parameters whilst ensuring a continuous row of panels rather than creating stepped changes in heights. Similarly, the minimum height of the solar panels is to be changed from

0.8m to 0.5m AGL where necessary to accommodate the undulations in the topography of the Site where the dips and slopes. It is also proposed that the maximum depth of the pile foundations is increased from 2m to 3m and that the mounting rack material of aluminium or stainless steel is amended to allow for the use of galvanised steel.

At the EiP, two of the fundamental issues raised by the Inspector and examined at length were the landscape and visual impacts of the proposals, particularly the solar panel arrays given the undulating nature of the land within the DCO site; and also the impacts of the proposals on surface water run-off and potential erosion of the soils below the panels and potential pollution impacts on water courses in the surrounding area. I would consider that the two changes above in their own right (notwithstanding the other 6 proposed changes) could not be realistically considered as non-material when they impact considerably on two of the main fundamental environmental impact issues considered at the EiP.

The implications of the increase in height of the panels, would seem to me to necessitate an update to the Landscape and Visual Impact Assessment and possibly the Glint and Glare Assessment submitted with the original DCO. The amendment to the heights of panels, to enable a more continuous, level, array, will potentially have a significant impact on the appearance of the development, erasing the undulations in landform and creating a more uniform surface. The impacts this may have on the glint and glare arising from the panels must also be fully assessed. Furthermore, the implications of the increase in depth of the pile foundations, would necessitate an update to the flood risk and drainage assessment of the application, to assess the potential for significant increased impact effects on surface water run-off, soil erosion and potential for pollution impacts on nearby water courses.

Change 4 – Substation - The original parameters allowed for a maximum dimension of 7.2m x 5.3m x 3.7m (length, height, width) for the substation transformer but does not specify if this comprises the fully assembled transformer with the additional electrical paraphernalia attached to the main body of the transformer. Therefore, for clarity and avoidance of doubt

the parameter is now proposed to be 8.3m x 6m x 5m (length, height, width) which represents the maximum parameters of the substation transformer fully assembled, including its additional electrical paraphernalia. The height of the assembled transformer remains below the tallest part of the substation which is the Overhead Busbar at a height of 7.4m. In addition, the concrete blast wall is to be increased from 5.2m in height to 6.3m for safety reasons.

In addition, the foundation depths of the Welfare Unit and Storage area are to increase from 0.1 to 0.6m and the foundation depth of the statcom will increase from 50mm to 1m.

While it is accepted that the changes proposed to the parameters of the substation are for clarity, the increase in height of the blast wall, by 1.1m, and in increase in depth of the foundations are considered material, particularly in light of the importance placed on visual impacts, land drainage and the potential to return to site to agricultural use on decommissioning during the EiA.

Change 5 – Jointing Bays - Following detailed design and input from the chosen grid connection provider, it is considered optimal to increase the depth and width of the

jointing bays from 12m x 2m x 2.6m (length, depth, width) to 12m x 4m x 3m (length, depth, width). This will enable a more efficient method of installation.

Again, this is considered a significant increase in the size and depth of the proposed jointing bays, more than doubling their size and having potential impacts on land drainage, decommissioning and restoration.

Change 6 – Onsite Cabling - Work no. 7 includes three aspects on onsite cabling:

- between battery containers, Power Conversion System (PCS) units, and from PCS to transformers;*
- between the transformer stations and the Proposed Development substation; and*
- between PV modules and inverters and from inverters to transformers.*

The parameters allowed for a minimum cable depth of 0.9m and a maximum cable trench dimension of 1.5m wide and 1.2m deep. It is now proposed that the minimum cable depth would be 0.7m and the maximum cable trench dimension would be 1.8m wide and 1.2m deep. In exceptional circumstances, for example to cross features such as other cables, the trench depth will be specific to engineering requirements.

The impacts of cable trenching upon land drainage, potential contamination and decommissioning were discussed at length in the examination. While the minimum depth of the trenching is to be reduced, the cross section, by virtue of increased width, is to be increased. The impacts of this increase should be examined in full in an updates Environmental Statement.

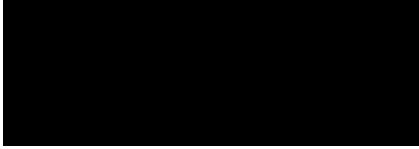
Change 7 – Permanent Internal Access Tracks - Currently the parameters allow for a permanent access track of 3.5 – 6.0m wide made up of 200mm of type 1 compacted stone/gravel with a geotextile membrane, or mown grass corridor. It is now proposed that this is amended to allow up to 400mm of compacted stone/gravel, such as type 1/6F5, with a geotextile membrane, or mown grass corridor. It should be noted that the additional 200mm of the material would be used to build up the road as opposed to requiring further excavation.

An additional 200mm of material to build up the access track above ground level may affect visual impact, potentially land drainage and surface water flows, along with site restoration upon decommissioning. The importation of the additional material must also be considered in the Construction Traffic Management Plan as the site, in association with other local, annual events, and ongoing highway and bridge works, has a cumulative impact on local domestic and commercial traffic flows. This issue was discussed at length at the examination and is of considerable concern to local residents and businesses.

Taken together, increases in the size of the transformer stations, main substation, increases to the depth and width of the jointing bays, increases in width of the cable trenches, and additional access track material usage and height, cannot be considered to constitute non-material changes to the parameters of the original DCO permission. These changes are cumulatively clearly material, raising issues that will require the updating of significant parts of the supporting Environment Statement including the LVIA, CTMP, Glint and Glare Assessment, Flood Risk and Drainage Assessment, and decommissioning and site restoration plans.

Derbyshire County Council therefore consider the proposed changes to be material.

Regards



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