

Our Ref: EN010153/DR/9.4

21 October 2026

Head of Energy Infrastructure Planning Delivery & Innovation
Department for Energy Security & Net Zero
3–8 Whitehall Place
London
SW1A 2AW

By email only to: FrodshamSolarFarm@planninginspectorate.gov.uk

Application Reference: EN010153

Response to Hover Force and Cellnex UK

Dear Sir or Madam,

I write on behalf of Frodsham Solar Limited (the Applicant) in response to the Secretary of State's (SoS) invitation to comment on the submissions from Hover Force Limited [C2-008] and Cellnex UK [C2-004].

Hover Force

The submission from Hover Force Limited [C2-008] is dated 11th December 2024 and was originally provided in response to the Phase Two Statutory Consultation, held from 7 November to 19 December 2024.

Paragraph 7.5.16 of the Consultation Report [APP-022] expressly acknowledges Hover Force's objection. Its objection and the Applicant's responses to the points raised in the letter appear in pages 246–248 of Appendix 10 of the Consultation Report [APP-032].

As such, the SoS and Hover Force Limited can be assured that the issues raised by Hover Force Ltd were considered in the application and were available to the Examining Authority and other interested parties who participated in the examination process.

The Applicant's response to the matters raised in document C2-008 are set out below.

Engagement

The Applicant does not accept that it failed to consult or approach [REDACTED], or that no representative of Cubico or its associated parties engaged with him. AMION Consulting, the tourism and recreation specialist within the Applicant's EIA team, interviewed [REDACTED] on 5 August 2024 specifically to understand Hover Force's activities and the potential effects of Frodsham Solar on the business. The interview record, which has been shared with [REDACTED] and is summarised in Chapter 10 of the ES [APP-045], identifies his concerns about construction disruption, customer access and the condition of Marsh Lane.

Furthermore, Hover Force received consultation materials as part of the Statutory Consultation undertaken pursuant to section 47 of the Planning Act 2008 and participated in that consultation by submitting the representation now provided as document C2-008.

Changes to the Order Limits

The Phase One Consultation, held from 1 June to 13 July 2023, was a non-statutory consultation on the initial Frodsham Solar proposals. The Phase One leaflet [APP-025] described an iterative process in which feedback would inform the design, with a further consultation (the Phase Two Statutory Consultation) to be undertaken on more detailed proposals and the Preliminary Environmental Information Report (PEIR).

The Design Approach Document [APP-130] explains how community and stakeholder feedback informed the design, including requests for additional paths and improvements to existing routes. Paragraph 5.3.35 records the identification of a potential visitor car park to respond to additional recreational use arising from that enhanced network. The evolution of the boundary between the initial non-statutory and statutory consultation enabled these proposals to be presented and consulted upon. The absence of the access route from Frodsham along Marsh Lane and the Brook Furlong overbridge to Moorditch Lane and the proposed car park from the initial proposals consulted on during the Phase One Consultation does not make its subsequent inclusion unjustified. The evolution of the design of a Nationally Significant Infrastructure Project, particularly in response to community consultation, is an intrinsic part of the process.

Highway safety and continued access

Rostons' objection letter includes a section on highway safety. However, it is partly based on the incorrect premise that Frodsham Solar construction traffic would approach from Frodsham along Marsh Lane and across the Brook Furlong overbridge. The Phase One leaflet identified construction access from the west. Construction access is via Pool Lane, Grinsome Road, Protos, Marsh Lane and the existing wind farm access tracks. The section of Marsh Lane on that western route can be distinguished from Marsh Lane leading out of Frodsham used by Hover Force. The western access route is also used for operational maintenance traffic and has been secured through the various management plans:

- Outline Construction Traffic Management Plan (oCTMP) P07 [EN010153/DR/7.4], describes the western access route and the prohibition of vehicles, including staff transport, accessing the Site over the Brook Furlong or Weaver Lane bridges. A routing plan identifying prohibited routes is provided within the oCTMP.
- Outline Construction Environmental Management Plan (oCEMP) P09 [EN010153/DR/7.5], sets out that no construction traffic is permitted to access the Site from Brook Furlong or Weaver Lane from Frodsham. Paragraph 4.1.66 expressly requires access to Hover Force's land to remain available at all times.
- Outline Operational Environmental Management Plan (oOEMP) P08 [EN010153/DR/7.6], confirms that operational access would be from the west, with access from Frodsham via Brook Furlong available only for emergency arrangements and public access to an approved visitor car park. Paragraph 4.1.72 repeats the commitment to maintain access to Hover Force's land.
- Outline Decommissioning Environmental Management Plan (oDEMP) P07 [EN010153/DR/7.7], repeats the above restrictions on access from Frodsham, application of the construction traffic management principles to decommissioning and the express commitment to maintain access to Hover Force's land.

Requirements 12, 13, 14 and 20 of the draft DCO secure the detailed oCEMP, oOEMP, oCTMP and oDEMP respectively.

The Applicant recognises Hover Force's existing rights of access along Marsh Lane, Brook Furlong and Moorditch Lane insofar as they serve its land. The Applicant is not seeking to extinguish that access and will exercise its powers consistently with the commitments above to keep access available throughout construction, operation and decommissioning. To this end, the Outline Construction Traffic Management Plan, at paragraph 4.1.66, includes a specific commitment to ensure that 'the requirements of the Proposed Development do not prevent access being available at all times to Hover Force Limited land'. To help meet this commitment, the Applicant will work with Hover Force on the practical arrangements required to minimise disruption to the business.

Public access and the visitor car park

Improved public access across the Site is an integral element of the Proposed Development, developed in response to community feedback from the Phase 1 Consultation, as explained in the Design Approach Document. The permissive paths, improvements to existing routes and associated facilities provide local recreational benefits. The proposed car

park addresses the possibility that improved recreational opportunities could exacerbate the informal parking already occurring on Moorditch Lane. The provision of the car park is therefore a proactive design measure proposed to manage the very issue that Roston's have raised as a concern.

Paragraphs 6.5.26–6.5.30 of the oLEMP P09 [EN010153/DR/7.13] set out the approach to requiring the delivery of the car park. This includes that the car park must be delivered unless the Applicant provides at least 12 months of monitoring data demonstrating that the access improvements have not resulted in a demonstrable increase in cars parking informally along Moorditch Lane, causing access/egress issues for other users of Moorditch Lane, including Hover Force. The oOEMP sets out that if it is agreed that a car park is not required, then this position will be reviewed every two years or until such time a car park is deemed necessary. The demand for parking, and whether informal parking on Moorditch Lane is causing access/egress issues for other users of Moorditch Lane will be included as an agenda item on any Community Liaison Group meetings during the operational period.

Following acceptance, Hover Force was served with a section 56 notice explaining how to make a Relevant Representation and participate in the examination process. Hover Force did not submit a Relevant Representation or participate in the Examination. Its consultation objection was nevertheless before the Examining Authority through the Consultation Report, as set out above. The access and parking issues were also examined through other parties' submissions and the Applicant's responses.

The monitoring and approval provisions were refined through that process. The Applicant is therefore confident that the concerns raised in relation to the potential visitor car park by Roston's in the December 2024 letter have been robustly considered through the process of the Examination.

Cadent HyNet North West Hydrogen Pipeline

Roston's letter assumes a concurrent construction programme for Frodsham Solar and Cadent's HyNet North West Hydrogen Pipeline. Cadent have publicly stated that the progression of its DCO application is paused pending clarity on the delivery timeline, with further engagement to take place before submission. They have not set out a proposed submission date. The assumption that the construction programmes will overlap is therefore very uncertain. Hover Force will have the opportunity to raise its concerns through Cadent's own consultation and consenting process.

Nonetheless, the pipeline was included in Frodsham Solar's cumulative assessment. ES Chapter 13 [APP-046, paragraphs] considers potential concurrent construction and concludes that significant cumulative effects are not anticipated with the implementation of the proposed mitigation measures. The oCTMP also provides for coordination with other major projects, including Cadent. The Applicant's position therefore does not depend on assuming that the pipeline will not proceed.

Cellnex UK

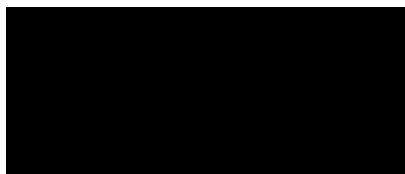
The Applicant has reviewed Cellnex UK's email of 8 October 2026 concerning the lattice mast at National Grid Reference 351110, 378091. The mast at the location identified lies outside the Order Limits. The mast lies adjacent to the Order Limits on the eastern side of Brook Furlong. The Applicant does not anticipate an interaction with the mast, or access to it.

In any event, Cellnex UK's interests as an electronic communications code network operator are protected by the provisions in Schedule 14 of the draft DCO, applied through Article 43. These include the application of the Code safeguards to the relevant statutory undertaker powers and provision for damage to apparatus or interruption of service caused by the development.

The Applicant will engage directly with Cellnex UK as detailed design and construction planning progress to confirm the position of its apparatus and access requirements and agree any necessary practical arrangements.

Please do not hesitate to contact the undersigned or [REDACTED] if you have any questions or require any further information.

Yours sincerely



[Redacted]

UK Development Lead on behalf of Frodsham Solar Limited (FSL)

FSL is a Cubico Sustainable Investments owned company