MILLS & REEVE

Your reference:

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2 October 2025

NSIP Case Manager The Planning Inspectorate

Sent by email only:

PeartreeHillSolarFarm@planninginspectorate.gov.uk

Dear Jake

RWE Renewables UK Solar and Storage Limited ("Applicant")
Proposed Peartree Hill Solar Farm Order (the "Proposed Development" and the proposed "Order")

We continue to be retained by Albanwise Limited ("Albanwise") in connection with the Proposed Development/the Order and write further to our e-mail exchange of 1 September 2025 regarding the Applicant's targeted consultation on proposed changes to the Proposed Development post submission of the application for the Order.

We note that a formal change request was submitted by the Applicant on 10 September 2025 ("Change Request") and has been accepted by the Examining Authority ("ExA"), as confirmed by letter dated 19 September 2025 ("Change Request Acceptance Letter").

Albanwise subsequently received a letter from the Applicant dated 24 September 2025 advising that representations on the 'Propose Provisions' (i.e. the changes set out in the Change Request) can be made up to 29 October 2025 ("**Change Request Representations Deadline**"). Albanwise's concerns regarding the Change Request are outlined in its response to the Applicant's targeted consultation on the same dated 5 September 2025, a copy of which was sent to the Planning Inspectorate. Albanwise are in the process of preparing relevant representations which will set out these concerns in further detail.

We note that in the Change Request Acceptance Letter, the ExA acknowledge Albanwise's serious concerns regarding the Change Request:

"Regarding Change 9, the ExA notes that if Plot 2A-5 were to be used temporarily for construction traffic including heavy goods vehicles, thereby negating a need to use the part of Plot 2A-4 adjacent to residential properties associated with Field House Farm, this change would be unlikely to result in any materially new or materially different effects (including in respect of noise and vibration), including incrementally, to those reported in the ES submitted with the application. However, the ExA notes from the

Change Application Consultation Report [REP2-150] the concerns of the landowner of this plot and the implications the use of this plot may have for the delivery of a consented solar farm known as Field House Solar Farm. The ExA considers there to be insufficient information at the current time to reach an informed conclusion on the matter and thus, it is likely that this matter would be explored further during examination."

We also note that the final page of the Change Request Acceptance Letter explains the following in relation to procedural matters:

"Following completion of the relevant representation period, and if required, a revised examination timetable, which addresses the change request, will be issued under rule 8(3) of the Infrastructure Planning (Examination Procedure) Rules 2010. The revised examination timetable, if required, will be issued after the close of the relevant representation period related to this change request. Such a revised examination timetable would be likely to include relevant deadline(s) for written representations to be submitted, periods within which responses should be submitted and an indication of any necessary hearings."

Additionally, Page 3 of the Change Request Acceptance Letter refers to Table 11.4 of the Applicant's Change Request which sets out proposed changes to the Examination timetable in relation to the Change Request which includes proposed additional hearings on 3 and 4 December 2025.

As the ExA will appreciate, it is vitally important that interested parties affected by the Change Request are afforded the opportunity to make oral representations at issue specific hearings ("ISH") and compulsory acquisition hearings ("CAH"). Reflective of the seriousness of the impacts of the Change Request on Albanwise's consented solar development, as well as its agricultural operations, we are in the process of instructing Counsel to appear at the additional hearings on the Change Request on Albanwise's behalf. We can confirm that Counsel is available on 3 and 4 December 2025 but we would welcome an opportunity to comment on the revised examination timetable before it is finalised and issued.

Given that ISH1 and CAH1 are to take place before the Change Request Representations Deadline of 29 October 2025, we assume that they will not involve any discussion on the Change Request and, on that basis, Albanwise do not intend to participate in them. If, however, this isn't the case or matters such as changes to the Examination timetable are to be discussed during ISH1 or CAH1, please can you confirm by return so that we can ensure that Albanwise are represented at these hearings.

Yours sincerely



Principal Associate for Mills & Reeve LLP

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