

Scaldwell Parish Council objects to the proposed Green Hill Solar Farm on the grounds that it fails to comply with key national planning policy tests, presents unresolved environmental, safety, and transport risks, and lacks adequate legal safeguards for restoration, thereby rendering it unacceptable in its current form.

#### Loss of Best and Most Versatile (BMV) Agricultural Land

The Applicant admits that approximately 65% of the site comprises Grade 1, 2, and 3a land—classified as Best and Most Versatile.

NPS EN-1 (2023) Paragraphs 5.11.12–14 require that development on BMV land should be avoided unless there is a clear and compelling justification, supported by evidence that no suitable alternative sites exist.

The site selection process, as presented in the Environmental Statement, fails to robustly demonstrate that less valuable land, brownfield sites, or rooftop solar options were fully considered and discounted. This represents non-compliance with national policy.

The National Planning Policy Framework also states that development should seek to avoid the loss of high-quality agricultural land where possible, giving preference to lower-grade and previously developed sites. The proposal is therefore contrary to both national policy documents.

**Highway Access and Traffic Safety Concerns in Scaldwell** The Transport Assessment and associated ES chapters indicate that construction and maintenance traffic will access the site via a network of narrow, rural lanes with limited capacity, poor alignment, and restricted visibility in several locations.

In Scaldwell, there has been a marked increase in Heavy Goods Vehicle (HGV) movements following the opening of a nearby depot associated with STABILISED PAVEMENTS LIMITED, based in Scaldwell. These HGV movements already place significant pressure on local roads.

The High Street is restricted to a single carriageway due to on-street parking along one side, creating pinch points and increasing collision risk when larger vehicles pass through.

The addition of construction traffic, abnormal loads, and long-term maintenance vehicles generated by this scheme will compound existing safety issues and congestion, with insufficient enforceable mitigation in the Applicant's transport proposals.

Scaldwell is a rural community with narrow, weight-restricted roads completely unsuitable for heavy goods vehicles.

Additional construction and maintenance traffic from the scheme will worsen congestion, damage roads, and increase hazards.

**Inadequate Decommissioning and Restoration Guarantees** The Draft DCO (Schedule 2) and Outline Decommissioning Statement (GH7.3) do not provide for a legally binding financial bond or enforceable mechanism to secure full site restoration at the end of the project's operational life (~60 years).

Without such guarantees, the risk falls to the community and local authority that the site could be abandoned or inadequately restored, contrary to principles of sustainable development and environmental stewardship.

**Under-Assessed Major Accident and Disaster Risk from the Battery Energy Storage System (BESS)** The Environmental Statement's Major Accidents and Disasters assessment acknowledges risks of fire, thermal runaway, and chemical pollution, but relies on generic mitigation measures without site-specific modelling of worst-case scenarios—particularly with respect to the site's hydrological connectivity to nearby protected habitats, including SPA and RAMSAR sites. This creates an unacceptable residual risk to both the environment and public safety.

**Significant Adverse Landscape and Visual Impacts** The Landscape and Visual Impact Assessment identifies multiple receptors (including public rights of way, residential properties, and designated heritage settings) that will experience significant adverse visual effects persisting beyond Year 15, even after proposed mitigation.

The Planning Statement asserts that these harms are outweighed by the scheme's benefits, but no robust balancing analysis is provided to justify this conclusion in policy terms.

**Procedural Concerns in Consultation and Alternatives Assessment** The Consultation Report reveals that many consultees—including statutory bodies—raised substantial concerns regarding BMV land loss, scheme scale, visual harm, traffic impacts, and BESS safety.

There is limited evidence that these issues were substantively addressed or that the scheme was meaningfully amended in response, undermining the adequacy of the consultation process under the Planning Act 2008.

**Conclusion** Scaldwell Parish Council considers that these multiple and interlinked deficiencies—in policy compliance, environmental safeguarding, safety assurance, transport risk management, and procedural adequacy—mean that the application should be refused in its current form.

Approval would set a damaging precedent for the unnecessary industrialisation of high-value agricultural land without adequate safeguards for restoration, public safety, highway safety, or landscape protection.