



SCOPING OPINION:

Proposed Arrow Valley Solar

Case Reference: EN0110033

Adopted by the Planning Inspectorate (on behalf of the Secretary of State)
pursuant to Regulation 10 of The Infrastructure Planning (Environmental
Impact Assessment) Regulations 2017

07 May 2026

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3. INTRODUCTION

- 3.1.1 On 27 March 2026, the Planning Inspectorate (the Inspectorate) received an application for a Scoping Opinion from Arrow Valley Solar Limited. (the applicant) under regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) for the proposed Arrow Valley Solar (the proposed development). The applicant notified the Secretary of State (SoS) under regulation 8(1)(b) of those regulations that they propose to provide an Environmental Statement (ES) in respect of the proposed development and by virtue of regulation 6(2)(a), the proposed development is 'EIA development'.
- 3.1.2 The applicant provided the necessary information to inform a request under EIA regulation 10(3) in the form of a Scoping Report, available from:
- 3.1.3 <https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN0110033>
- 3.1.4 This document is the Scoping Opinion (the Opinion) adopted by the Inspectorate on behalf of the SoS. This Opinion is made on the basis of the information provided in the Scoping Report, reflecting the proposed development as currently described by the applicant. This Opinion should be read in conjunction with the applicant's Scoping Report.
- 3.1.5 The Inspectorate has set out in the following sections of this Opinion where it has / has not agreed to scope out certain aspects / matters on the basis of the information provided as part of the Scoping Report. The Inspectorate is content that the receipt of this Scoping Opinion should not prevent the applicant from subsequently agreeing with the relevant consultation bodies to scope such aspects / matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects / matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.
- 3.1.6 Before adopting this Opinion, the Inspectorate has consulted the 'consultation bodies' listed in appendix 1 in accordance with EIA regulation 10(6). A list of those consultation bodies who replied within the statutory timeframe (along with copies of their comments) is provided in appendix 2. These comments have been taken into account in the preparation of this Opinion.
- 3.1.7 The Inspectorate has published a series of advice pages, including '[Advice Note 7: Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping \(AN7\)](#)'. AN7 and its annexes provide guidance on EIA processes during the pre-application stages and advice to support applicants in the preparation of their ES.
- 3.1.8 Applicants should have particular regard to the standing advice in AN7, alongside other advice notes on the Planning Act 2008 (PA2008) process, available from:
['Nationally Significant Infrastructure Projects: Advice pages'](#)

- 3.1.9 This Opinion should not be construed as implying that the Inspectorate agrees with the information or comments provided by the applicant in their request for an opinion from the Inspectorate. In particular, comments from the Inspectorate in this Opinion are without prejudice to any later decisions taken (e.g. on formal submission of the application) that any development identified by the applicant is necessarily to be treated as part of a Nationally Significant Infrastructure Project (NSIP) or associated development or development that does not require development consent.

2. OVERARCHING COMMENTS

2.1 Description of the Proposed Development

(Scoping Report Sections 3 and 4)

ID	Ref	Description	Inspectorate's comments
21.1	Table 4-1	Worst Case Scenario	<p>The Inspectorate notes that some optionality has been included within the design of the proposed development, for example, different panel types and number of BESS enclosures required. Where there is optionality, the ES should assess the worst-case scenario.</p> <p>Furthermore, the ES should define the maximum depth and width of cable corridors and final easements and use this to inform a worst-case scenario in aspect assessments where relevant.</p>
212	Paragraph 3.3.15	Agricultural land	<p>The ES should contain a clear tabulation of the areas of land in each Best Most Versatile (BMV) classification to be temporarily or permanently lost as a result of the proposed development, with reference to accompanying map(s) depicting the grades. Specific justification for the use of the land by grade should be provided.</p>
213	Paragraphs 4.3.27 and 4.3.39	Mitigation and Enhancement Areas	<p>The Scoping Report states that undeveloped areas of the site will be used to provide mitigation and enhancement measures as required to lessen the environmental impact of the proposed development. The ES should identify where measures are considered to be mitigation for potential effects as a result of the proposed development, and where measures are enhancement compared to the existing baseline conditions, and in relation to Biodiversity Net Gain (BNG), ensure that mitigation for loss of habitat is not double counted as enhancement.</p>
214	Paragraphs 4.3.34 and 4.4.5	Construction compounds	<p>The Scoping Report states that temporary construction compounds will be required along the Cable Route Corridor (CRC). The ES should specify whether any additional land take would be required for these compounds, or whether they would be sited within the red line boundary of the site. To ensure a robust assessment of likely significant effects, the ES</p>

ID	Ref	Description	Inspectorate's comments
			should also provide details regarding the number, location and dimensions of construction compounds, and include these in any relevant assessment such as construction phase flood risk.
215	Paragraph 4.3.36	Site access	The Scoping Report states that existing access points are to be used where practicable. It is not clear within the Scoping Report whether new access points would be required. The ES should identify any additional access points required to facilitate the proposed development and assess any environmental implications within the relevant ES aspect chapters where significant effects are considered likely.
216	Paragraph 4.3.37	Abnormal Indivisible Loads (AIL)	The Scoping Report states that transformers used in the on-site substations will be classified as AIL. It is not clear whether additional works to accommodate AILs would be required, such as road widening on proposed routes. The ES should clarify whether additional works are required to proposed AIL routes and if so, the impacts which may result from such works, together with relevant mitigation measures, should be assessed within relevant aspect chapters of the ES where significant effects are likely to occur. The ES should set out the predicted number of abnormal loads and expected routeing.
217	Paragraph 4.4.3	Crossing points	The Scoping Report states that crossing points may need to be upgraded or constructed during the site preparation stage of construction. The ES should identify which features will be crossed and at what locations, with reference to any accompanying figure(s). The ES should describe the types of crossings that are required, their scale and dimensions and the nature of any associated construction works (for example the use of Horizontal Directional Drilling).
218	Paragraph 4.5.4	Component replacement	The Scoping Report states that due to the 60-year operational lifespan of the proposed development, it is expected that the PV panels could require replacement once and the BESS up to four times during operation. Where there is the potential for comprehensive replacement of infrastructure during the operational lifespan of the proposed development then the ES should have regard to the construction phase impact assessment when setting out the appropriate mitigation.

ID	Ref	Description	Inspectorate's comments
			The ES should describe the scope and duration of the maintenance and replacement activities likely to be required, including predicted vehicle movements and staffing numbers. The ES should provide estimates of types and quantities of waste expected as well as an assessment of any likely significant effects associated with the generation and disposal of waste.

2.2 EIA Methodology and Scope of Assessment

(Scoping Report Section 2)

ID	Ref	Description	Inspectorate's comments
221	Paragraphs 1.6.58 to 1.6.73	Local Planning Policy	In addition to the planning policy listed between paragraphs 1.6.58 to 1.6.73, the Inspectorate draws the applicant's attention to representations received from Salford Priors Parish Council and Bidford on Avon parish councils advising of a made Salford Seven Neighbourhood Development Plan, the applicant should ensure that it takes account of all relevant Development Plans and planning policy.
222	Paragraph 2.3.7	Professional judgement	The ES should provide evidence to support conclusions or clearly identify where professional judgement has been relied upon to determine the level of significance of effects. Any use of professional judgement to assess significance should be fully justified within the ES.
223	N/A	References and Citations	A number of hyperlinks included as references within the Scoping Report do not work. The ES should ensure that all citations and references are consistent throughout, and any hyperlinks included work as intended.
224	N/A	Transboundary	<p>The Inspectorate on behalf of the SoS has considered the proposed development and concludes that the proposed development is unlikely to have a significant effect either alone or cumulatively on the environment in a European Economic Area State. In reaching this conclusion the Inspectorate has identified and considered the proposed development's likely impacts including consideration of potential pathways and the extent, magnitude, probability, duration, frequency and reversibility of the impacts.</p> <p>The Inspectorate considers that the likelihood of transboundary effects resulting from the proposed development is so low that it does not</p>

ID	Ref	Description	Inspectorate's comments
			<p>warrant the issue of a detailed transboundary screening. However, this position will remain under review and will have regard to any new or materially different information coming to light which may alter that decision.</p> <p>Note: The SoS' duty under regulation 32 of the 2017 EIA Regulations continues throughout the application process.</p> <p>The Inspectorate's screening of transboundary issues is based on the relevant considerations specified in the annex to its Advice Page 'Nationally Significant Infrastructure Projects: Advice on Transboundary Impacts and Process', links for which can be found in paragraph 1.0.7 above.</p>
225	N/A	Scoping table	<p>The Inspectorate recommends the use of a table in the ES to set out key changes in parameters/ options of the proposed development presented in the Scoping Report to those presented in the ES. It is also recommended that a table demonstrating how the matters raised in the Scoping Opinion have been addressed in the ES and/ or associated documents provided.</p>

3. ENVIRONMENTAL ASPECT COMMENTS

3.1 Waste and Materials

(Scoping Report Section 5.2)

ID	Ref	Applicant’s proposed matters to scope out	Inspectorate’s comments
31.1	Table 5-5 and paras 5.2.21 and 5.2.22	Permanent Removal of Materials from the Market - Construction	The Scoping Report proposes to scope this matter out on the basis that the predicted material use for the construction phase of the proposed development does not exceed the thresholds set out in the Institute for Sustainability and Environmental Professionals (ISEP) guidance document, Materials and Waste in Environmental Impact Assessment (2025). The Inspectorate notes that an estimate of material usage has not been provided within the Scoping Report, which instead relies upon the applicant’s experience in promoting solar projects of a similar scale to rule out significant effects. The Inspectorate is content with this approach. Providing the ES can point towards a case study where a solar project of a similar magnitude was below the stated guidance thresholds, the Inspectorate agrees that this matter can be scoped out from further assessment.
31.2	Table 5-5	Large quantities of waste being diverted to landfill – All phases	The Scoping Report states that the predicted volume of waste generated during construction is not expected to exceed the thresholds set out in the ISEP guidance and that the quantities of componentry that would need to be replaced during operation would be negligible compared to the baseline. Insufficient evidence has been provided to confirm that waste generated during construction would be below the ISEP thresholds. Furthermore, the Scoping Report indicates that major component replacement may be required during the lifetime of the proposed development. As such, the Inspectorate is not in a position to scope this matter out. The ES should include estimates, by type and quantity, of expected residues and emissions and quantities and types of waste produced in line with Schedule 4 of the EIA Regulations. The ES should include an assessment of likely significant effects arising from the transportation and disposal of waste.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.13	Table 5-5	Sterilization of Mineral Resources – Construction and Operation	<p>This matter is proposed to be scoped out on the basis that any mineral sterilisation would not be permanent, and so resources would be available for exploitation after the lifetime of the proposed development. Parts of the proposed development site are located within Mineral Safeguarding Areas (MSA). The proposed development inhibits any access to the resource during the development's lifetime, and this has not been considered. The Inspectorate agrees that assessment of this matter can be scoped out of the ES. However, the applicant should, either within the ES or as a part of the wider application, demonstrate that the Minerals Planning Authority has been consulted in respect of the proposals and that the proposed development does not impact on future ambitions for minerals extraction within the region.</p>

ID	Ref	Description	Inspectorate's comments
3.14	N/A	N/A	N/A

3.2 Major Accidents and Disasters

(Scoping Report Section 5.3)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
321	Table 5-7	Electrical fires and explosions	The Scoping Report outlines in Section 5.5 (chapter 5 – Air Quality), that there is a low risk of electrical fire within the BESS. The Report states that an outline Battery Safety Management Plan (oBSMP) would be implemented and would include fire-fighting, emergency response, containment measures, and risk assessments to be undertaken and fed into the design process to minimise any possible impacts from fire risk. The Inspectorate considers that this approach and the information provided aligns with the solar scoping advice page. On the basis that these mitigation and management measures are secured through the DCO, and evidence of agreement in safety measures is provided with relevant consultation bodies, the Inspectorate can agree to scope this matter out of the assessment of MA&D.
322	Table 5-7	COMAH Sites	This matter is proposed to be scoped out on the basis that there are no designated COMAH regulation sites located within 500 metres of the Site and no Likely Significant Effects (LSE) are anticipated. Paragraph 5.3.13 states that the 'Groundsure Report' does not record any upper/lower tier COMAH installations within 500 metres of the site boundary. On this basis, the Inspectorate agrees that this matter can be scoped out from further assessment.
323	Table 5-7	Utilities damage/strike	This matter is proposed to be scoped out on the basis that utilities strike/damage is either not considered likely to result in an event that would qualify as a MA&D and/or would be mitigated by standard good working practice and implementation of the CEMP and protective provisions in the DCO. The Inspectorate has considered the characteristics of the proposed development and is in agreement that this matter can be scoped out of further assessment.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
324	Table 5-7	Accidental spillages	<p>This matter is proposed to be scoped out on the basis that accidental spills during construction will be typical of any construction site and would be mitigated through standard good working practices and implementation of the CEMP. Furthermore, the Report states that during operation, no chemicals/substance would be stored on the Site that could give rise to an MA&D as a result of an accidental spill following standard measures implemented via the outline Operational Environmental Management Plan (OEMP) and regular inspections of the area. The Inspectorate agrees that it is unlikely that the operation of the proposed development would generate significant pollutants and that these matters can therefore be scoped out of the assessment.</p>
325	Table 5-7	<ul style="list-style-type: none"> • Glint and glare • Geohazards • Flood Risk • Vulnerability to climate change (excluding flood risk) • Traffic and road accidents 	<p>A standalone chapter for major accidents and disasters is not proposed on the basis that the nature, scale, and location of the proposed development is not considered to be vulnerable to or to give rise to significant impacts in relation to the risk of accidents and major disasters. Scoping Report Table 5-7 presents a list of possible major accidents and disasters that will require consideration including ground gas migrations, geohazards, flooding, vulnerability to climate change, and traffic and road accidents. The Report states that the above potential major accidents and disasters will be considered in the design of the proposed development and covered in the Flood Risk Assessment, surface water drainage strategy, glint and glare assessment, oCTMP, and Outline Landscape and Ecological Management Plan (oLEMP). The Inspectorate has considered the characteristics of the proposed development and agrees with this approach. However, the ES should clearly signpost where these impacts are assessed in other relevant chapters and where any relevant mitigation measures are secured, if required.</p>
326	Table 5-7	Infestation/ spread of Vegetation pests and diseases	<p>This matter is proposed to be scoped out on the basis that any infestation/spread of pests and diseases that meet the scale of those required to constitute a major accident or disaster are considered very unlikely as a result of the Scheme and any such spread of INNS would be controlled via the implementation of the LEMP that would be submitted with the DCO application and planting design. The Inspectorate considers that this approach and the information provided aligns with the solar scoping advice page. On the basis that</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			these mitigation and management measures are secured through the DCO, the Inspectorate can agree to scope this matter out.
327	Table 5-7	Crime/terrorism	This matter is proposed to be scoped out on the basis that industry standard control and security measures will be implemented across the Scheme. The Inspectorate has considered the characteristics and location of the proposed development and considers that this approach and the information provided aligns with the solar scoping advice page. The Inspectorate agrees that this matter can be scoped out of further assessment.
328	Table 5-6, Table 5-7, and Paragraph 5.3.14	Decommissioning phase	The Scoping Report states that detailed information is not available for the decommissioning phase, but that the impacts during the decommissioning phase would be likely similar to impacts during the construction phase and have been scoped accordingly. The Report further states that at the end of the operational life, a decommissioning plan will be prepared and implemented. On the basis that a decommissioning plan is prepared and implemented at the end of the operational life of the proposed development and the oDEMP is submitted as part of the DCO application, the Inspectorate agrees that this matter can be scoped out of further assessment.

ID	Ref	Description	Inspectorate's comments
329	Paragraph 5.3.13	Groundsure report	The Scoping Report references a Groundsure Report as justification to scope matters out, however the Groundsure report has not been included in the appendices or figures. The applicant should ensure that any evidence used to justify statements or to support assessments is included within the ES.

3.3 Socioeconomics

(Scoping Report Section 5.4)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
331	Table 5-8	Agricultural Businesses – All phases	This matter is proposed to be scoped out on the basis that the temporary and short-term nature of the construction and decommissioning phases mean that disturbances to agricultural businesses during these periods would not be significant and the scheme would provide affected farmers with an alternative source of income during operation. On this basis, the Inspectorate agrees that significant effects to agricultural businesses are not likely to occur. This matter can be scoped out of from further assessment.
332	Table 5-8	Employment and Skills Effects – All phases	This matter is proposed to be scoped out on the basis that whilst there would be beneficial employment effects attributed to the scheme, it is unlikely that they would be significant due to much of the skilled construction/decommissioning workforce being from outside of the local area, and there being limited employment opportunity during operation. On this basis, the Inspectorate agrees that significant effects are not likely to occur. This matter can be scoped out from further assessment.
333	Table 5-8	Economic Output – All phases	This matter is proposed to be scoped out on the basis that whilst there would be some Gross Value Added (GVA) during construction/decommissioning; the area of impact would be the wider UK and so impacts to national GVA would not be significant. The operation phase would generate limited levels of employment and so would contribute little to local GVA. On this basis, the Inspectorate agrees that significant effects are not likely to occur. This matter can be scoped out of further assessment.
334	Table 5-8	Tourism and Recreation – All phases	The Scoping Report proposes to scope this matter out on the basis that the proposed development is not expected to disrupt any roads or transport routes and the sites are not near any major tourist attraction. Whilst the Inspectorate agrees that the proposed development is not likely to impact upon any major tourist attractions, it considers that this

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			justification does not consider wider tourism, such as visitors attracted by walking and cycling routes. Furthermore, there are a number of heritage assets within the study area which are likely to attract visitors. The ES should describe the existing baseline environment with regards to tourism and recreation and provide an assessment of this matter including any potential cumulative impact where significant effects are likely to occur.
335	Table 5-8	Accommodation – All phases	This matter is proposed to be scoped out on the basis that according to data from the Office for National Statistics, the proposed development would require 1.4% of the regional workforce to enable construction and these workers would be in a commutable distance to the site. This statement is in contradiction with the justification for scoping out employment and skills effects which states that much of the workforce will be sourced from outside of the local area. Limited information has also been provided on the accommodation capacity of the local area. The Inspectorate is therefore not able to scope this matter out. The ES should assess impacts on the availability of local accommodation and services where significant effects are likely to occur.
336	Table 5-8	Shops – All phases	This matter is proposed to be scoped out on the basis that whilst there may be some beneficial effect through expenditure on food and drink from construction workforce, they would not be significant. On this basis, the Inspectorate agrees that significant effects to local shops are not likely to occur. This matter may be scoped out of the ES.
337	Table 5-8	PRoW and Population – All phases	These matters are proposed to be scoped out of the socioeconomics assessment on the basis that they will be assessed in Chapter 14: Population and Human Health. On this basis, the Inspectorate agrees that these matters can be scoped out of the Socioeconomics assessment.

ID	Ref	Description	Inspectorate's comments
338	N/A	N/A	N/A

3.4 Air Quality

(Scoping Report Section 5.5)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
34.1	Table 5-10	Dust – Construction and Decommissioning	The Scoping Report proposes to scope this matter out on the basis that a construction dust risk assessment will determine the potential for dust emissions during the construction phase and identify appropriate mitigation to be secured within the outline Construction Environmental Management Plan (oCEMP). Provided that the appropriate mitigation measures are secured through the oCEMP via a DCO requirement, the Inspectorate is content to scope this matter out.
34.2	Table 5-10	Traffic emissions – Construction and decommissioning	This matter is proposed to be scoped out on the basis that construction traffic will be managed through a Construction Traffic Management Plan (CTMP) which will include measures to minimise construction traffic related impacts. The Inspectorate considers that insufficient information has been provided on expected vehicle movements to scope this matter out at this stage. The ES should include an assessment of construction and decommissioning traffic emissions or otherwise present a justification in the ES as to why significant effects are not likely to occur, with reference to the expected vehicle movements and the relevant Environment Protection UK (EPUK)/ Institute of Air Quality Management (IAQM) thresholds.
34.3	Table 5-10	Exhaust emissions from non-road mobile machinery (NRMM) – Construction and decommissioning	This matter is proposed to be scoped out on the basis that emissions would be controlled through the application of best practice measures and secured via the oCEMP. Limited information has been provided on the typical plant and non-road mobile machinery to be used and their expected locations. As such, the Inspectorate is not in a position to scope this matter out at this stage. The ES should provide an assessment of construction and decommissioning plant and NRMM exhaust emissions or provide further justification as to why significant effects are not likely to occur.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
344	Table 5-10	Traffic emissions and combustion plant - Operation	The Scoping Report proposes to scope out emission from combustion plant, and road traffic exhaust emissions during operation. This is on the basis of the nature of the proposed development, that no combustion plant is proposed and that there would only be limited movement of vehicles to the application site for maintenance purposes. The Inspectorate agrees that it is unlikely that the operation of the proposed development would generate significant emissions to air or significant operational traffic and that these matters can be scoped out of the assessment. The ES must however provide information on the nature of vehicle movements during the operational phase including the type and scale of maintenance activities, frequency, estimated number of vehicle movements (alone and cumulatively) and confirm that these projections fall below the relevant thresholds set out in guidance. The ES project description should also confirm that there would be no emissions from operational plant that require further assessment.
345	Table 5-10	Emissions from BESS fire event - Operation	This matter is proposed to be scoped out of the proposed development on the basis that emissions associated with a BESS fire will be dealt with in the oBSMP and that overall, there is a low likelihood of occurrence. Providing the oBSMP accounts for potential air quality impacts from a fire at the BESS and assesses any significant effects on the environment from a BESS fire, the Inspectorate agrees that this matter can be scoped out from further assessment.

ID	Ref	Description	Inspectorate's comments
346	N/A	Guidance	The Applicant's attention is drawn to the Defra advice 'PM2.5 Targets: Interim Planning Guidance'. The ES should explain how key sources of air pollution within the proposed development have been identified and how action has been taken to minimise emissions of PM2.5 or its precursors
347	N/A	Study area	The Scoping Report volume 2 figure 5.5.2 displays the air quality study area, however this is not explained or justified within volume 1. The ES should provide justification with

ID	Ref	Description	Inspectorate's comments
			reference to the relevant guidance for the study area for ecological and human receptors and agree this where possible with relevant consultation bodies.

3.5 Climate Vulnerability

(Scoping Report Section 5.6)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
35.1	Table 5-11 and Paragraphs 5.6.17 to 5.6.19	<p>Construction equipment, workers, site access (Construction phase):</p> <ul style="list-style-type: none"> • Extreme weather cause construction equipment to overheat and/or delay construction activities • Extreme weather creates unsafe working conditions that delay the construction programme • Supply chain disruption • Fire risk poses a direct risk to worker health and safety • Construction dust - implications on air 	<p>The Scoping Report proposes to scope out climate vulnerability impacts during the construction phase on the basis that climate change is unlikely to be significant during the two-year construction period, and that the risk of climate hazards will be managed through an oCEMP as well as through application of general health and safety practices.</p> <p>Matters such as supply chain disruption are proposed to be scoped out on the basis that they would be outside of the control of the Scheme.</p> <p>Paragraph 5.6.18 states that a severe weather plan will be included within the oCEMP that sets out how weather forecasts would be monitored and what actions would be taken in response to adverse weather. Other mitigation measures include an ERP (fire risk) and best practice measures (construction dust) stated to be included in the CEMP. On the basis that an oCEMP is submitted with the DCO application that includes such measures and taking into account the short-term duration and nature of construction work, the Inspectorate agrees that effects are not likely to be significant and can be scoped out of further assessment.</p> <p>The Inspectorate notes that the potential effect of flooding is assessed within the Water Environment chapter (section 5.7) and will be assessed within the Flood Risk Assessment (FRA) to be submitted with the application and are not included within the Climate Vulnerability chapter. The Inspectorate is content with this approach.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		<p>quality and workforce health</p> <ul style="list-style-type: none"> Hot weather and extended periods of increased heat - reduced productivity, risks to human health and wellbeing Flood risk 	
352	Table 5-12 and Paragraphs 5.6.20 to 5.6.21	<p>Performance (asset efficiency) and physical damage to assets - Operational phase:</p> <ul style="list-style-type: none"> Higher temperature leading to reduced cell efficiency/energy Climate change increasing agricultural value of land hence reducing Scheme's commercial viability 	<p>The Scoping Report proposes to scope out matters in relation to the Scheme's vulnerability to climate change during the operational phase. This is on the basis that there is beneficial impact, limited or negligible potential for Likely Significant Effects (LSE) and the use of embedded mitigation measures (identified in Paragraph 5.6.21) such as planting designs across the Scheme, design adjustments to withstand different climates, maintenance cycles, oBSMP, SuDS, and provision of an ERP to be secured by the detailed oBSMP would prevent any potential impacts from climate change. The Inspectorate considers that this approach and the information provided aligns with the solar scoping advice page and on the basis that the relevant mitigation measures are submitted with the DCO application and takes into account the duration and nature of construction work, the Inspectorate agrees that effects are not likely to be significant and can be scoped out of further assessment.</p> <p>The Inspectorate notes that the potential effect of flooding is assessed within the Water Environment chapter (section 5.7) and will be assessed within the Flood Risk Assessment (FRA) to be submitted with the application and are not included within the Climate Vulnerability chapter. The Inspectorate is content with this approach.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		<ul style="list-style-type: none"> • More soiling • Increased heat could reduce the capacity of transmission lines • Increased losses within substation and transformers • Reduced water availability for cleaning solar PV panels • Increased degradation of solar PVs due to increased temperatures • Hotter summers could damage assets • Flooding • Drier summers could cause soil instability which could adversely 	

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		<p>affect structures and foundations</p> <ul style="list-style-type: none"> • Damage to assets during more regular and potentially more intense windstorms • Increase in the magnitude and frequency of wildfire occurrences may result in thermal runaway associated with the BESS • Dried out soils due to hotter temperatures, which could make them easily eroded by wind/rain and cause sedimentation within Scheme's drainage capacity 	

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		<ul style="list-style-type: none"> • Damaged landscaping • Extreme weather impacts on electrical equipment • Milder winters could reduce freeze thaw erosion which can damage underground assets 	
353	Table 5-13	<p>Potential operational impacts on environmental receptors:</p> <ul style="list-style-type: none"> • More intense summer rainfall and wetter winters could increase soil erosion • Precipitation changes could increase flood risk from rivers and ponds 	<p>Impacts from intense rainfall and winter are proposed to be scoped out on the basis that there will be replanting of all soil surfaces during operation which would mitigate effects of increased precipitation on bare ground. On this basis, the Inspectorate agrees that this matter may be scoped out of further assessment.</p> <p>Precipitation changes could increase flood risk from rivers and ponds and is proposed to be addressed in Chapter 5, Section 5.7 relating to Water Environment. However, matters in regard to impacts from precipitation is not outlined in detail in chapter 5, section 5.7. Providing precipitation changes and its effects are assessed within the FRA, the Inspectorate agrees that this matter can be scoped out from further assessment.</p>

ID	Ref	Description	Inspectorate's comments
354	N/A	Cumulative effects	The ES should consider how other developments cumulatively may affect the vulnerability of the proposed development to climate change eg any changes in flood flows, and cumulative GHG emissions/ savings. The Applicant should seek to agree the approach to the climate change cumulative effects assessment with relevant consultation bodies.

3.6 Water Environment

(Scoping Report Section 5.7)

ID	Ref	Applicant's proposed aspect to scope out	Inspectorate's comments
36.1	Paragraphs 5.7.13 to 5.7.14; 5.7.33; 5.7.49 to 5.7.51; 5.7.52 to 5.7.55; 5.7.57 to 5.7.58	Surface Water and Groundwater – All phases	<p>The Scoping Report states that the anticipated impacts arising from the proposed development can be mitigated through best practice measures and adherence to appropriate guidance. An oCEMP is proposed to be submitted as part of the DCO application to secure any necessary mitigation of significant adverse effects upon surface water receptors. The Inspectorate considers that insufficient information has been provided on the proposed mitigation and the sensitivity of receptors to rule out any significant effects. Considering a Water Framework Directive (WFD) waterbody also runs through one of the solar array areas, the Inspectorate is unable to scope this matter out. The ES should provide an assessment of any surface and groundwater bodies potentially affected by the proposed development. This should also include any impacts arising upon surface water abstractions and discharges and groundwater receptors within the study area and as a result of dewatering and foul water.</p> <p>The applicant's attention is drawn to the consultation response from the Environment Agency (EA) (appendix 2 of this Opinion) for further information on this matter.</p>
362	Paragraphs 5.7.69 to 5.7.74	Flood Risk – All phases	<p>A separate Flood Risk Assessment is proposed as part of the DCO application.</p> <p>Providing the FRA contains the information specified within the solar scoping table set out within the Planning Inspectorates 'Nationally Significant Infrastructure Projects: Technical Advice Page for Scoping Solar Development', the Inspectorate agrees that this matter may be scoped out from the ES.</p>

ID	Ref	Description	Inspectorate's comments
363	Paragraph 5.7	Water Demand	<p>The Scoping Report does not adequately evaluate the potential water demand arising as a result of the proposed development. Consumptive water uses that may be required by the proposed application may include: potable/domestic supply to water stations; dust suppression; wheel washing; and drilling fluids associated with horizontal directional drilling. As such, the Inspectorate considers that the ES should assess the potential impacts to water demand as a result of the proposed development.</p> <p>The applicant's attention is drawn to the consultation response from the EA (appendix 2 of this Opinion) for further information on this matter.</p>
364	Paragraphs 5.7.3 to 5.7.4	Study Area	<p>The Scoping Report states that the study area is an area of 1km around the site and that this is based on professional judgement. It is stated that 1km of watercourse connectivity is an appropriate distance to sufficiently reduce potential impacts through dilution. It is also stated that off-site impacts 'further upstream and downstream' will be assessed if required.</p> <p>The ES should make it clear how the study area has been selected and how the hydrological connectivity of relevant water features has been assessed. If dilution is proposed to address potential impacts, this should be clearly explained. The ES should assess the potential for adverse effects on water quality unless it can demonstrate that there would be no pathways of effect for water quality.</p>
365	Paragraph 5.7.16	Surface Water Features	<p>The Scoping Report states that 'a number' of ponds are located throughout the study area.</p> <p>The ES should clearly identify the number and locations of relevant surface water features in the study area and assess their connectivity in relation to potential impacts from the proposed application.</p>
366	Paragraph 5.7.17	Designated Sites (European Sites)	<p>The Scoping Report states that no Special Areas of Conservation, Special Protection Areas, or Ramsar sites are located within the study area.</p>

ID	Ref	Description	Inspectorate's comments
			<p>The ES should clarify whether any part(s) of the site or study area falls within the zones of influence for any designated sites. If it is assessed that no impacts are likely to arise upon a particular site as a result of the proposed application, this should be clearly stated.</p>
36.7	Paragraph 5.7.18	Designated Sites (Broom Railway Cutting)	<p>The Scoping Report states that the Broom Railway Cutting Site of Special Scientific Interest, located within the study area, is in favourable condition and has no water pressures or dependencies and is not considered further.</p> <p>The ES should make it clear how potential impacts upon designated sites are assessed. If it is assessed that no impacts are likely to arise upon a particular site as a result of the proposed application, this should be clearly stated.</p>
36.8	Paragraph 5.7.38	Flood Defence Impact	<p>The Scoping Report does not propose an assessment of the potential impact of the proposed development upon existing flood defences. The ES should assess any potential impacts upon flood defences, including with regards to impacts associated with future climate change scenarios.</p> <p>The applicant's attention is drawn to the consultation response from the EA (appendix 2 of this Opinion) for further information on this matter.</p>
36.9	Paragraphs 5.7.45 and 5.7.46	Groundwater Flooding	<p>The Scoping Report states that groundwater flood risk is generally low, with areas of higher risk found along the Rivers Arrow and Avon, with subsites 2(b) and 2(e) being the most likely to be impacted. No further details or proposed mitigation measures are given.</p> <p>Where an elevated flood risk upon relevant receptors is identified, the ES should make it clear how this is proposed to be addressed.</p>
36.10	Paragraph 5.7.50	Pollution Prevention Guidelines	<p>The Scoping Report states that surface water impacts during construction/decommissioning can be mitigated through best practice measures and adherence to the Pollution Prevention Guidelines. However, it is noted that these guidelines have been archived, and no link is provided to access them.</p>

ID	Ref	Description	Inspectorate's comments
			Where the ES refers to industrial guidance as part of its mitigation strategy, this guidance should be up-to-date and clearly referenced.
36.11	Paragraphs 5.7.56, 4.6.3	Decommissioning of Cabling	<p>The Scoping Report variously states that, at decommissioning, buried cables will be removed and recycled or left in-situ. The ES should clarify the proposed cabling works at decommissioning and consider the likely significant effects of the options chosen.</p> <p>The applicant's attention is drawn to the consultation response from the EA (appendix 2 of this Opinion) for further information on this matter.</p>
36.12	Paragraph 5.7.70	Solar Photovoltaic Panel Clearance Level	<p>It is unclear whether the Scoping Report proposes a 0.4m or 0.6m freeboard clearance allowance. The ES should clarify the proposed freeboard clearance allowance, and a credible maximum scenario should be used to assess the sensitivity of the design choice taken with regards to potential water environment impacts.</p> <p>The applicant's attention is drawn to the consultation response from the EA (appendix 2 of this Opinion) for further information on this matter.</p>

3.7 Electro-magnetic Fields

(Scoping Report Section 5.8)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
37.1	Paragraph 5.8.21	Electromagnetic fields (EMF) – Construction and Decommissioning	This matter is proposed to be scoped out on the basis that electricity will not be generated during these phases and so there will be no potential effects from EMF. On this basis, the Inspectorate agrees that EMF effects during construction and decommissioning of the proposed development can be scoped out of the ES.
37.2	Paragraph 5.8.23	EMF - Operation	<p>The Scoping Report proposes to scope this matter out on the basis that, although 400kV cables will be in use during operation, good design practice and embedded measures would be sufficient to reduce potentially significant effects. The Inspectorate also notes that EMF will be discussed within an 'Other Matters' chapter within the ES which will be supported by a technical impact assessment as an appendix to the ES. The Inspectorate is content with this approach. The EMF assessment should include the location, routing and voltages of any cables over 132kV and include consideration and a risk assessment for any human and ecological sensitive receptors within the Zone of Influence (Zoi).</p> <p>The Inspectorate considers that impacts to ecological receptors as a result of EMFs should be considered within the ecology chapter of the ES, however. See comment ID 3.8.14 below.</p>

ID	Ref	Description	Inspectorate's comments
37.3	N/A	N/A	N/A

3.8 Ecology and Biodiversity

(Scoping Report Section 6)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
38.1	Table 6-2	Statutory Designated Sites greater than 2 km from the Sites and CRC – All Phases	The applicant proposes to scope out this matter on the basis that there are no international designated sites within 10km (or sites designated for bats or birds within 30km) of the proposed development. On this basis, the Inspectorate agrees that the proposed development is unlikely to result in significant effects on statutory designated nature conservation sites and is content for this matter to be scoped out of further assessment.
38.2	Table 6-2	Non-statutory Designated sites greater than 1km from the sites and CRC – All phases	This matter is proposed to be scoped out on the basis that effects to non-statutory designated sites beyond 1km from the proposed development boundary are deemed unlikely. On this basis, the Inspectorate agrees that significant effects are not likely to occur on non-statutorily designated sites beyond 1km. This matter can be scoped out from further assessment.
38.3	Table 6-2	Ancient Woodland and veteran trees greater than 500m from the Sites and CRC – All phases	This matter is proposed to be scoped out on the basis that effects to areas of ancient woodland beyond 500m from the site are deemed unlikely. Considering the nature of the proposed development, the Inspectorate agrees that significant effects on ancient woodland sites beyond 500m from the proposed development boundary are not likely to occur. This matter can be scoped out from further assessment.
38.4	Table 6-2	Terrestrial habitat (including priority habitats, and priority/protected plant species) within and up to 50m of the Sites and CRC - Operation	The Inspectorate agrees that operational activities are not likely to result in significant effects upon terrestrial habitats on site and adjacent to it. This matter can be scoped out from further assessment.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
385	Table 6-2	<p>Effects on the following species during operation:</p> <ul style="list-style-type: none"> • Amphibians (including Great Crested Newt (GCN)) • Bats (roosting and commuting/ foraging) • Breeding birds • Barn Owls • Non-breeding birds • Otters • Water Voles • Terrestrial invertebrates 	<p>These species are proposed to be scoped out on the basis that no direct effects are anticipated, and indirect effects would be managed using embedded design measures and the outline oOEMP. Whilst it is agreed that general operation and maintenance of the proposed development would be unlikely to lead to significant effects, the Inspectorate notes that the proposed development will include major component replacement during the operational lifespan of the proposed development. Limited information has been provided on potential vehicle movements, the timing of the component replacement and the estimated quantum of componentry that may need replacing. As such, the Inspectorate is not in a position to scope these matters out at this stage. The ES should assess the potential impacts on these species from major component replacement during operation of the proposed development, or otherwise provide the information required to rule out significant effects. This should include agreement with the relevant consultation bodies.</p>
386	Table 6-2	<p>Bats (commuting and foraging) within the CRC – All phases</p>	<p>Impacts to commuting and foraging bats within the CRC are proposed to be scoped out of the ES on the basis that they would be temporary, there would be no significant loss of suitable habitats and precautionary avoidance measures would be included within the CEMP, OEMP and DEMP. On this basis, the Inspectorate agrees that significant effects are not likely to occur on commuting and foraging bats within the CRC. This matter can be scoped out from further assessment.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
38.7	Table 6-2	Badgers within and up to 30 m of the Sites and CRC – All phases	This matter is proposed to be scoped out of the ES on the basis that badgers are protected for welfare and not nature conservation concerns and measures would be included within the ES and outline control documents to ensure legal compliance. It is noted that the site contains suitable habitat for foraging and commuting badgers, and that one active badger sett was recorded on site. The Inspectorate agrees that significant effects are not likely to occur during operation, and so this matter can be scoped out during the operation phase. However, no detail has been provided regarding the proposed precautionary mitigation measures. Furthermore, no site layout options have been presented and as such it is not confirmed that habitats will be retained. Insufficient information has been provided at this stage to enable the Inspectorate to scope this matter out during construction and decommissioning. The ES should assess the potential impact to badgers during the construction and decommissioning phases of the proposed development.
38.8	Table 6-2	Breeding birds within the CRC – All phases	This matter is proposed to be scoped out on the basis that impacts during construction are considered to be non-significant and below ground infrastructure is to be left in-situ during decommissioning. The Inspectorate agrees that significant impacts are unlikely to occur during operation and as such impacts during this phase can be scoped out of the ES. However, the Inspectorate notes the potential presence of red list species such as skylark within the CRC, which utilise open cropland for breeding habitats. As such, the Inspectorate considers that there is the potential for significant impacts to breeding birds within the CRC during the construction phase. The Inspectorate is therefore not able to scope this matter out. The ES should contain an assessment of the construction impacts on breeding birds within the CRC.
38.9	Table 6-2	Non-breeding birds within the CRC – All phases	This matter is proposed to be scoped out on the basis that impacts would be temporary and would not result in significant losses of suitable habitat. The Inspectorate notes that non-breeding bird surveys were carried out but did not cover the entirety of the non-breeding bird season. The ES should provide further

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			explanation as to why these surveys are considered sufficient to establish a suitably robust baseline or otherwise provide an assessment of any likely significant effects.
38.10	Table 6-2	Hazel dormice within the Sites and CRC – All phases	This matter is proposed to be scoped out on the basis that it is unlikely that hazel dormice are present within the site. On the basis of the information provided, the Inspectorate agrees that Hazel Dormice are not likely to be present on site. This matter can be scoped out of the ES.
38.11	Table 6-2	Beavers within the Sites and CRC – All phases	Impacts to beavers are proposed to be scoped out on the basis that the presence of beaver is considered unlikely with there being no known releases within the wider area. The Scoping Report also states that should the otter survey identify the presence of beaver on site, then they will be scoped back into the assessment. The Inspectorate agrees with this approach. Impacts to beavers can be scoped out of the ES.
38.12	Table 6-2	Impacts to: <ul style="list-style-type: none"> • Other priority mammals • Widespread reptile species 	The Scoping Report proposes to scope out a detailed assessment of impacts on these species, stating that whilst they are assumed to be present, the majority of the highest value habitat to these species would be retained and any potential impacts would be localised and temporary. The Inspectorate notes that the Applicant has not yet undertaken ecological surveys of the study area (with the exception of a walkover survey and bird surveys). Furthermore there are records of brown hares, hedgehogs and polecats in proximity to and within the site. Without certainty on the extent and presence of these species, the Inspectorate does not agree that a detailed assessment of impacts on these species can be scoped out. The ES should address potential impacts on these species, supported by robust baseline survey data, unless otherwise agreed with relevant consultation bodies.
38.13	Table 6-2	White-clawed crayfish within the Sites and CRC – All phases	The Scoping Report states that this species is potentially present within the site but proposes to scope out an assessment on the basis that embedded mitigation measures would reduce impacts to watercourses as far as practicable. The Inspectorate considers that insufficient information has been provided on the extent

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			and presence of this species on site. In the absence of such information including evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope this matter from the assessment. Accordingly, the ES should include an assessment of this matter or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.
38.14	Table 6-2	Impacts to: <ul style="list-style-type: none"> • Watercourse Habitats • Pond habitats • Fish • Aquatic Macroinvertebrates • Aquatic Macrophytes - All phases 	<p>These matters are proposed to be scoped out on the basis that although notable communities may potentially be present within watercourses and standing waterbodies on site, the mitigation for watercourse impacts outlined in section 5.7 would be sufficient to avoid LSE. The Inspectorate considers that insufficient information has been provided on the sensitivity of these receptors to rule out significant effects. The Inspectorate is therefore not in a position to scope this matter out. The ES should provide an assessment of these matters across all phases of the proposed development.</p> <p>The ES should also consider the potential impacts from EMF on fish species where high voltage cables are passing beneath main watercourses.</p> <p>The applicant's attention is also drawn to the consultation response from the EA (Appendix 2 of this Opinion) regarding this matter.</p>
38.15	Table 6-2	Lake Habitats – All phases	This matter is proposed to be scoped out on the basis that there are no lakes on site or adjacent to the proposed development. On this basis the Inspectorate is content to scope this matter out.

ID	Ref	Description	Inspectorate's comments
38.16	Section 6.3	Habitat connectivity	The baseline description of habitats within the Scoping Report is primarily on a site-by-site level across the various site parcels and CRCs and does not include landscape

ID	Ref	Description	Inspectorate's comments
			scale consideration of the wider ecological context. The ES should have regard to the role of the proposed development sites within wider habitat networks and ecological corridors. This should include assessment of the potential impacts to habitat connectivity and fragmentation. The applicant's attention is drawn to the consultation response from Worcestershire County Council (appendix 2 of this Opinion) in this regard.
38.17	Table 6-1	Great Crested Newt (GCN)	The applicant has identified waterbodies within and in proximity to the site with the potential to support GCN populations. The Applicant should note that if they intend to offset the effects of the proposed development on GCN by obtaining a licence through the NE District Level Licensing (DLL) scheme, the Inspectorate understands that the DLL approach includes strategic area assessment and the identification of risk zones and strategic opportunity area maps. The ES should include information to demonstrate whether the proposed development is located within a risk zone for GCN. If the Applicant enters into the DLL scheme, NE will undertake an impact assessment and inform the Applicant whether their scheme is within one of the amber risk zones and therefore whether the proposed development is likely to have a significant effect on GCN. The outcome of this assessment will be documented on an Impact Assessment and Conservation Payment Certificate (IACPC). The IACPC can be used to provide additional detail to inform the findings in the ES, including information on the proposed development's impact on GCN and the appropriate compensation required.
38.18	Table 6-1	Hedgerows	The Inspectorate notes the applicant's intention to assess hedgerows against the wildlife and landscape criteria specified in Schedule 1 of the Hedgerows Regulations (1997). The ES should also include an explanation of how the hedgerow boundaries of the site will be retained and enhanced to deliver a range of benefits to protected species.
38.19	Table 6-1	Surveys	The Scoping Report states that a number of species surveys will not be carried out despite local records of such species and suitable habitat on site. The ES should ensure the ecological baseline is robust and provide further justification for any survey excluded. The Inspectorate considers that the applicant should seek agreement from the relevant

ID	Ref	Description	Inspectorate's comments
			consultation bodies on any excluded surveys and the scope, scale and extent of any surveys undertaken, evidence of which should be provided within the DCO application.
3820	Table 6-1	Severn Estuary Special Area of Conservation (SAC) and Ramsar – Functionally Linked Habitats	The Inspectorate notes that the River Avon intersects the study area and CRC. It is considered that the River Avon provides functionally linked habitat for species underpinning the Severn Estuary Special Area of Conservation (SAC) and Ramsar designated sites. These species include lamprey, brown/sea trout and European Eel. As such, the Inspectorate considers that the ES should assess the potential impacts to these species, and by extension the sensitive sites, from all phases of development. The applicant's attention is drawn to the consultation response from the EA (appendix 2 of this Opinion) for further information on this matter.
3821	Table 6-1	Dewatering impacts	The ES should consider the potential risks from contamination or dewatering on Feckenham Wylde Moor Site of Special Scientific Interest (SSSI) as a result of trenching works within the CRC. The applicant's attention is drawn to the consultation response from Redditch Borough Council (Appendix 2 of this Opinion) for further information.
3822	Paragraph 6.6.2	Horizontal Directional Drilling (HDD)	It is noted that HDD may be employed to enable cable crossings of watercourses on site. Where this is the case, the ES should consider the effects of drilling in watercourses on invertebrates and fish species found in these drilling locations.
3823	Table 6-2	Invasive Non-Native Species (INNS)	Table 6.2 of the Scoping Report omits potential impacts from the introduction or spread of INNS. The ES should assess impacts to habitats, species and designated sites from the potential introduction/spread of INNS.
3824	N/A	Sensitive environmental information	<p>Under Regulation 12(5)(g) of the Environmental Information Regulations 2004 (EIR), public bodies have a responsibility to avoid releasing sensitive environmental information that could bring about harm to sensitive or vulnerable ecological features.</p> <p>Sections of the ES containing specific survey and assessment data relating to the location of sensitive species (e.g., badgers, rare birds, and plants) or other vulnerable environmental features should be provided in separate annexes by the applicant. This</p>

ID	Ref	Description	Inspectorate's comments
			<p>approach reduces the sensitive ecological feature's risk of disturbance, damage, persecution, or commercial exploitation arising from publication.</p> <p>The applicant's approach should be proportionate and only use these separate annexes for species where there is a genuine risk of harm.</p> <p>All other assessment information should be included in an ES chapter, as normal, with a placeholder providing a justification as to why annexes have been withheld and that a full version of the ES has been submitted to the Inspectorate.</p>

3.9 Ground conditions and Contamination

(Scoping Report Section 7)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
39.1	Table 7-5	New sources of contamination arising from construction activities and from damage to solar panels during operation	This matter is proposed to be scoped out on the basis that there are measures to be set out through best practice construction methods, operation procedures, and monitoring to be detailed in the CEMP and OEMP. On this basis, the Inspectorate agrees that significant effects as a result of new sources of contamination are not likely to occur. This matter can be scoped out from further assessment.
39.2	Table 7-5	Ground Gas	<p>This matter is proposed to be scoped out on the basis that there are no proposed enclosed structures as part of the proposed development within which ground gas may accumulate. The Report further states in paragraphs 7.3.31 – 7.3.32, that there is potential for ground gas to be located within Site 1, Site 2, CRC2 and also within 500 metres of Site 1, Site 2, Site 3, CRC1, CRC2, CRC3, and CRC4. The Inspectorate disagrees with the statement that there would be no structures as part of the proposed development within which ground gas may occur. It considers that any enclosed structure has the potential to accumulate ground gas. As such, the Inspectorate is not in a position to scope this matter out. The ES should assess the potential for LSE to occur from potential sources of ground gas that may arise from the proposed development.</p> <p>The applicant's attention is drawn to the comments from Redditch Borough Council at Appendix 2 of this Scoping Opinion relating to potential ground gas risk where confined spaces or buildings are proposed.</p>
39.3	Table 7-5	Statutory or non-statutory geological or	This matter is proposed to be scoped out on the basis statutory and non-statutory geological or environmental designations have not been identified on the site. On this basis, the Inspectorate agrees that the proposed development is unlikely to result in

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		environmental designations	LSE on any statutory or non-statutory geological designations. This matter can be scoped out of the ES.
394	Table 7-5	UXO	This matter is proposed to be scoped out on the basis that the potential risk related to UXO has been identified to be low. Paragraph 7.3.37 identifies that 'Zetica' is used to identify and provide a preliminary indication of the potential risk of encountering UXO, and further states that it does not consider other forms of ordnance and is not site-specific assessment. It is unclear in the Scoping Report whether UXO surveys have been undertaken to determine the potential for undetected UXO to be present on-site. On the basis of the information provided, the Inspectorate does not agree to scope this matter out at this stage. The ES should assess the potential for LSE to occur from UXO or demonstrate the absence of LSE eg through the provision of surveys or agreement with relevant consultation bodies.

ID	Ref	Description	Inspectorate's comments
395	Paragraphs 7.3.1 to 7.3.3	Study Area	The Scoping Report identifies that the Study Area includes the site plus land within a buffer of up to 500m from the site when considering the effects associated with land contamination, however this is not explained or justified within these paragraphs. The ES should make it clear how the study area has been selected with reference to the relevant guidance for the relevant receptors and agree this where possible with relevant consultation bodies.
396	N/A	Contaminated land	The ES should ensure it is clear and consistent with its approach to identifying contaminated land within and near the site. The applicant's attention is drawn to the comments from Redditch Borough Council at Appendix 2 of this Scoping Opinion relating to the feature 'Bidford Gliding Club' highlighted as a potential contaminated land near the site.

3.10 Soils and Agriculture

(Scoping Report Section 8)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.10.1	Table 8-5	Soil Resources – All phases	This matter is proposed to be scoped out during all phases on the basis that the impacts on the low-medium sensitivity soils (affected by the construction of the proposed development) are expected to be temporary (two years) and reversible, as soils would be reinstated following construction and decommissioning. In addition, during the operational phase, there would be no further development of built infrastructure and hence no further impacts on soils resources. Paragraph 8.7.2 of the Scoping Report outlines that the baseline for the soils and agriculture chapter was established through the provisional ALC mapping rather than survey data and a majority of the ALC grading was determined through the provisional mapping. On the basis of the information provided, the Inspectorate does not agree to scope this matter out. The ES should assess potential for LSE to occur from the proposed development on soil resources that may arise from all phases of the Scheme.
3.10.2	Table 8-5	Soil functions and ecosystem services – Construction, Operation, Decommissioning	This matter is proposed to be scoped out during all phases on the basis that agricultural soils underlying the proposed development do not support protected features within a UK designated site and hence impacts on soil functions and ecosystems are considered unlikely to be significant. The Inspectorate notes the commitment to best practice measures and the implementation of a soil management plan. On this basis, the Inspectorate agrees that significant effects are not likely to occur on soil functions and ecosystem services and this matter can be scoped out from further assessment.
3.10.3	Table 8-5	Soil Carbon – Construction, Operation, Decommissioning	This matter is proposed to be scoped out during all phases on the basis that soils are mineral and not expected to contain high levels of carbon or organic matter. Therefore, impacts on soil carbon are considered unlikely to be significant. On the

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			basis that the soil associations within the site do not contain high levels of carbon or organic matter, the Inspectorate agrees to scope out this matter.
3.104	Table 8-5	Agricultural land – All phases	<p>This matter is proposed to be scoped out during all phases on the basis that impacts on the BMV land are expected to be temporary and that the land would be restored to its previous ALC grade following construction on the CRC and decommissioning for the sites. Whilst the impacts may be reversible on decommissioning, the Inspectorate considers that the anticipated 60-year lifespan of the proposed development represents a long-term impact which should be reflected in the assessment conclusions accordingly. The Inspectorate agrees that assessment of this matter can be scoped out of the ES. However, the applicant should still, either within the ES or as a part of the wider application, consider the implications of the long-term loss of agricultural land.</p> <p>The applicant's attention is drawn to the comments from Alcester Town Council at Appendix 2 of this Scoping Opinion relating to the agricultural land quality within the proposal area and the impact of the proposed development on the long-term loss of agricultural land and quality of the soil for agricultural purposes during the decommissioning phase.</p>
3.105	Table 8-5	Agricultural land holdings – Operation, Decommissioning	<p>This matter is proposed to be scoped out during the operation and decommissioning phases on the basis that there is no expected further development of built infrastructure and that during decommissioning of the solar infrastructure, agricultural land holdings are expected to return to their farming activities and no LSE are expected. Furthermore, the farming activities would be followed up with aftercare program which would be implemented within the oDEMP. On this basis, the Inspectorate agrees that significant effects to agricultural land holdings during operation and decommissioning are not likely to occur. This matter can be scoped out from further assessment.</p>

ID	Ref	Description	Inspectorate's comments
3.106	Paragraphs 8.3.1 to 8.3.2	Study area	The Scoping Report states that the study area for the soils and agricultural land assessment covers the proposed development site only, and there is no buffer as it describes the impacts from the development as only occurring on-site. The ES should consider any adjoining agricultural land if that might be affected and should provide a clear justification for the extent of the study area chosen and how this relates to the extent of the likely impacts. The study area should be clearly depicted on figures to aid understanding.
3.107	Paragraph 8.7.2	Survey data	Paragraph 8.7.2 of the Scoping Report outlines that the baseline for the soils and agriculture chapter was established through the provisional ALC mapping rather than survey data. DEFRA has updated and replaced the Provisional ALC mapping with a Predictive Agricultural Land Classification map. The new map reveals that 20% of land has improved by one grade since the publication of the Provisional ALC map, though a further 20% has decreased in grade. The ES should consider the updated data and map when considering effects on agricultural land and different ALC grades.

3.11 Climate Change

(Scoping Report Section 9)

ID	Ref	Applicant’s proposed matters to scope out	Inspectorate’s comments
3.11.1	Table 9-3	GHG emissions - Decommissioning	This matter is proposed to be scoped out during the decommissioning phase on the basis that it is unlikely to affect the Government’s ability to meet its carbon reduction targets and would result in a non-significant effect on climate. Providing the appropriate good practice measures are included within the decommissioning plan, the Inspectorate agrees that this matter can be scoped out from further assessment.

ID	Ref	Description	Inspectorate’s comments
3.11.2	Table 17-1	Climate change – Proposed Elements to be Scoped In/Out	It is noted in table 17-1 that the assessment of GHG emissions during construction phase would be scoped out, when table 9-3 states that this phase is scoped in. The Inspectorate assumes this is a textual error and that this statement intended to include only the ‘decommissioning phase’. Care should be taken to ensure that cross-referencing in the ES is accurate and consistent.

3.12 Transport and access

(Scoping Report Section 10)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.121	Paragraph 10.6.16	Decommissioning Phase	<p>The Scoping Report states that the effects of the decommissioning phase are likely to be broadly similar to those of the construction phase and a separate decommissioning assessment is not required. An outline Decommissioning Environment Management Plan (oDEMP) is proposed for submission as part of the DCO application.</p> <p>On this basis, the Inspectorate agrees that this matter may be scoped out, provided that the ES includes information on the likely trip generation arising during decommissioning and details on the mitigation measures proposed to avoid any likely significant effects.</p>
3.122	Paragraphs 10.6.17 to 10.6.19	Operational Phase – General Maintenance Trip Generation	<p>The Scoping Report states that trip generation resulting from general (routine) maintenance in the operational phase is expected to be negligible or neutral.</p> <p>The Inspectorate agrees that this matter can be scoped out, provided that the frequency and type of trips and vehicles during the operational phase would not trigger thresholds for likely significant effects within guidance from the Institute of Sustainability of Environmental Professionals (ISEP). The applicant should also refer to the total change threshold to support the assertion that changes would not be significant.</p>
3.123	Paragraphs 10.6.20 to 10.6.28	Operational Phase – Element Replacement Trip Generation	<p>The Scoping Report states that solar PV panels may require replacement up to once and batteries up to four times over the operational lifespan, and this is likely to generate trips exceeding that expected from routine maintenance activity but still insufficient to result in significant effects.</p> <p>The Inspectorate considers that insufficient information has been provided regarding the trip generation associated with the replacement of solar PV panels and batteries, including the frequency and types of trips. It is noted that this activity necessitates the</p>

			<p>use of HGVs and that the frequency of part replacement has been based on the operational lifespans of those parts, but it is not clear whether large numbers of parts may therefore require replacement at the same or similar times due to the concurrence of the operational lifespans of these parts and, if so, whether this has the potential to lead to likely significant effects.</p> <p>In the absence of such information, or evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope this matter from the assessment. Accordingly, the ES should include an assessment of this matter or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of an LSE.</p>
3.124	Table 10-3	Operational Phase – Non-Routine Maintenance Trip Generation	<p>The Scoping Report proposes to scope this matter out on the basis that non-routine maintenance will be infrequent and will be managed through a management plan. However, no further detail is provided regarding this matter throughout the chapter, and it is not clear what would comprise non-routine maintenance, nor how frequently this would be undertaken and what associated traffic may be generated as a result.</p> <p>The Inspectorate agrees that this matter can be scoped out, provided that the frequency and type of trips and vehicles generated during the operational phase by non-routine maintenance traffic would not trigger thresholds for likely significant effects within guidance from ISEP. The applicant should also refer to the total change threshold to support the assertion that changes would not be significant</p>

ID	Ref	Description	Inspectorate’s comments
3.125	Section 10.3	Baseline Conditions	<p>The Scoping Report provides an overview of the local highway network, including key strategic and local routes expected to be employed as part of the proposed application.</p> <p>The ES should provide timely data on baseline traffic volumes in the relevant area to ensure an accurate assessment of the change arising as a result of the proposed application.</p>

3.126	Paragraphs 10.4.5 to 10.4.8 and 10.7.2	Study Area	<p>The Scoping Report states that the study area has been defined by identifying any link or location where significant impacts and effects could occur as a result of the proposed application.</p> <p>The ES should confirm the final study area and key roads included in the assessment and explain how they have been identified. In addition to agreement with the local highway authority, consideration should also be given to industry guidance and the extent of the potential impacts and likely sensitive receptors. A plan illustrating the extent of the study area, expected construction traffic routes, and the anticipated numbers and types of vehicle movements should be included in the ES, showing vehicle type, peak hours, and daily movements.</p>
3.127	Paragraphs 10.4.15 to 10.4.31 and Table 10-2	Professional Judgement	<p>The Scoping Report states that the magnitude of change upon various aspects of transport and access will be assessed using professional judgement.</p> <p>The ES should clearly explain the reasoning and factors used to assess the magnitude of change arising as a result of the proposed application.</p>
3.128	Paragraphs 10.4.33 to 10.4.35	Cumulative Effects	<p>The Scoping Report states that potential cumulative effects during the construction phase are to be assessed, including other developments predicted to generate traffic within the study area during construction and other developments anticipated to be under construction over the same period.</p> <p>The ES should assess potential cumulative effects across all phases of the proposed development. If other phases are proposed to be scoped out of the cumulative effects assessment, a justification should be provided for this.</p>

3.13 Noise and Vibration

(Scoping Report Section 11)

ID	Ref	Applicant’s proposed matters to scope out	Inspectorate’s comments
3.131	Table 11-7	Traffic Vibration – All Phases	<p>The Scoping Report proposes to scope this matter out of further assessment on the basis that road surfaces will be ‘free of irregularities under general maintenance’ and resulting vibration will therefore not have the potential to lead to significant adverse effects.</p> <p>The Inspectorate considers that insufficient information has been provided to verify the potential significance of traffic vibration impacts. The final construction and maintenance access routes are not yet confirmed, and it is not clear which receptors have been considered for potential vibration impacts. The number and types of vehicle trips generated at each stage has not been confirmed. The ES should also clarify what constitutes an acceptable state of road maintenance for the purpose of managing vibration emissions and how this will be ensured where necessary.</p>
3.132	11.6.5; Table 11-7	Traffic Noise – Operational Phase	<p>The Scoping Report proposes to scope this matter out of further assessment on the basis that operational traffic would be limited to occasional maintenance visits and replacement of panels, which would occur at a low volume unlikely to give rise to significant effects.</p> <p>However, it is noted that replacement of battery elements would also be required. The Inspectorate considers that insufficient information has been provided regarding the number and types of trips generated by the replacement of operational elements, and the levels of traffic noise likely to be generated, and the impact thereof upon sensitive receptors, are unclear. In the absence of further information relating to these matters, the Inspectorate cannot agree to scope this matter out.</p>
3.133	11.6.4; Table 11-7	Operational Equipment Vibration	<p>The Scoping Report proposes to scope this matter out of further assessment on the basis that the levels of vibration generated by operational equipment associated with</p>

			the proposed development would be negligible. On this basis, the Inspectorate is in agreement that this matter can be scoped out of further assessment.
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ID	Ref	Description	Inspectorate's comments
3.134	Paragraphs 11.4.4 to 11.4.7	Study Areas	<p>The Scoping Report proposes a 300m study area radius for the assessment of construction and decommissioning noise and a 500m radius for the assessment of operational noise. This has the potential to exclude noise sensitive receptors that are identified in the operational noise study area from the assessment of construction and decommissioning noise impacts. Furthermore, a construction vibration study area of 100m is proposed as 'effects typically diminish' within this distance. The ES should explain how the study areas and sensitive receptors have been selected with reference to the extent of the likely impacts.</p>
3.135	Paragraphs 11.4.20 to 11.4.22	Significance of Effects	<p>The Scoping Report states that major/moderate impacts arising from construction noise and vibration and construction traffic noise will be considered to constitute a significant effect only where the duration exceeds 10 or more days or nights in any 15 consecutive days or nights or more than 40 days in any 6 consecutive months.</p> <p>The ES should explain the basis on which these thresholds have been selected, why these thresholds are considered appropriate with respect to the sensitivity of the relevant receptors, and why effects not meeting these thresholds would not be considered significant. Furthermore, if significance is to be based on the duration of an effect, the ES should clarify how the durations of relevant effects are to be forecast and what, if any, monitoring arrangements are proposed.</p>

3.14 Landscape and Visual

(Scoping Report Section 12)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.14.1	Table 12.2	National Landscapes – Malvern Hills	This matter is proposed to be scoped out on the basis that the National Landscape is located over 26km away from the proposed development site. On this basis, the Inspectorate agrees that this matter can be scoped out from further assessment.
3.14.2	Table 12.2	Visual Receptor – Dark Skies	This is proposed to be scoped out as the proposed development consists minimal lighting and hence would not likely have a significant impact on dark skies. The Inspectorate considers that insufficient information has been provided on the proposed lighting strategy to rule out significant effects. As such, the Inspectorate is not in a position to scope this matter out. The ES should provide further information on the construction and operational lighting strategy, in particular how the lighting design has been developed to minimise light spill and assess the effects of intermittent lightning on dark skies and human and ecological receptors.

ID	Ref	Description	Inspectorate's comments
3.14.3	Paragraph 12.1.8	Study area	<p>The Scoping Report states that a preliminary study area of 3km (500m for the CRC) from the site boundary has been chosen for the LVIA assessment. It is not clear how this study area has been established. The ES should provide further justification for this study area, with reference to a Zone of Theoretical Visibility (ZTV) and the furthest extent of likely significant effects.</p> <p>The applicant's attention is drawn to the consultation response from Stratford-on-Avon District Council (appendix 2 of this Opinion) for further information on this matter.</p>
3.14.4	Paragraph 12.3.74	Photomontages	The Scoping Report states that three to six photomontages will be produced for sites one to four, excluding the CRCs on the basis that development will be below ground.

			<p>The Applicant should justify the location of photomontages, ensuring these are representative of the maximum visual envelope of the proposed development. The Applicant should seek agreement from relevant consultation bodies regarding the appropriateness of selected photomontages and evidence of this agreement should be provided within the DCO application. The photomontages should show all components of the proposed development, including the pole mounted CCTV, security fencing, BESS, substations, switch room(s) etc., and demonstrate the proposed development before and after mitigation in order to enable a worst-case scenario to be fully understood.</p>
3.145	Tables 12-1, 12-3 and Paragraph 12.4.6	Methodology	<p>It is noted that the Scoping Report methodology refers to the “magnitude of impact” rather than the “magnitude of effect”. The Landscape Institutes ‘Guidelines for Landscape and Visual Impact Assessment 3’ (GLVIA3) highlights a clear distinction between the terms ‘impact’ and ‘effect’, with the former referring to an “action being taken” within the guidance. The ES should ensure that the correct terminology is used when defining significance. Furthermore, Paragraph 12.4.6 refers to tables 2-1 and 2-3 for determining significance criteria, stating that they will be modified to align with GLVIA3. The guidance explicitly cautions against the use of generic matrices to derive the significance of LVIA effects. The applicant should seek to agree the approach to the LVIA chapter of the ES with the relevant consultation bodies. The applicant’s attention is also drawn to the consultation response from Stratford-on-Avon District Council (appendix 2 of this Opinion) for further information on this matter.</p>

3.15 Historic Environment

(Scoping Report Section 13)

ID	Ref	Applicant’s proposed matters to scope out	Inspectorate’s comments
3.15.1	Table 13.2 and Paragraph 13.6.7	Indirect impacts to designated assets (solar array sites) – decommissioning phase	<p>The Scoping Report proposes to scope these aspects out on the basis that, the decommissioning phase is expected to be of a similar or lesser magnitude than the construction phase. It is noted that mitigation is also proposed to be secured through the oDEMP.</p> <p>The Inspectorate agrees that indirect significant impacts on designated assets are unlikely to occur during decommissioning, these matters can be scoped out of the ES.</p>
3.15.2	Table 13.2 and Paragraph 13.6.7	Direct and Indirect impacts to non-designated assets and direct impacts to archaeological remains (solar array sites) – decommissioning phase	<p>The Scoping Report proposes to scope these matters out on the basis that, the decommissioning phase is expected to be of a similar or lesser magnitude to that of the construction phase. It is noted that mitigation is also proposed to be secured through the oDEMP. On this basis, the Inspectorate agrees that significant effects are not likely to occur. This matter can be scoped out from further assessment.</p>
3.15.3	Table 13.2 and Paragraph 13.6.6	Indirect impacts to designated assets, direct impacts to non-designated assets, direct impacts to archaeological remains (CRCs) – operational phase	<p>The Scoping Report proposes to scope these matters out on the basis that, there are unlikely to be any impacts during operation.</p> <p>The Inspectorate agrees that indirect impacts to designated assets, direct impacts to non-designated assets, and direct impacts to archaeological remains within the CRC during the operational phase are unlikely to occur. These matters can be scoped out of the ES.</p>

3.154	Table 13.2 and Paragraph 13.6.6	Indirect impacts to designated assets (CRCs) – decommissioning phase	<p>The Scoping Report proposes to scope these matters out on the basis that the decommissioning phase would either retain the setting created during construction or restore it, therefore resulting in no additional adverse impacts.</p> <p>The Inspectorate agrees that indirect impacts to designated assets relating to the CRCs during the decommissioning phase are unlikely to occur. These matters can be scoped out of the ES.</p>
3.155	Table 13.2 and Paragraph 13.6.6	Direct impacts to non-designated assets and archaeological remains (CRCs) – decommissioning phase	<p>The Scoping Report proposes to scope these matters out on the basis that, the decommissioning phase is expected to be of a similar or lesser magnitude to that of the construction phase. On this basis, the Inspectorate agrees that significant effects are not likely to occur. This matter can be scoped out from further assessment.</p>
3.156	Table 13.1 and 13.2.	Historic Landscape (CRCs) – Operational and decommissioning phase	<p>Impacts to Historic Landscapes within the CRCs are proposed to be scoped out on the basis that, cables connecting to the Feckenham sub-station are to be left in-situ during the decommissioning phase. On this basis, the Inspectorate agrees that significant impacts on historic landscape are unlikely to occur. These matters can be scoped out of the ES.</p>

ID	Ref	Description	Inspectorate's comments
3.157	Paragraph 13.4.5	Cable route baseline	<p>The Scoping Report does not propose geophysical surveys for the cable route. Whilst the Inspectorate acknowledges that the cable route search areas are not finalised, geophysical surveys should be used to inform the design evolution of route corridors, where possible.</p>

3.16 Population and Human Health

(Scoping Report Section 14)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.16.1	Paragraph 14.3.4	Hunt End & Feckenham/Redditch MSOA	<p>Per figure 16.1, a small part of the proposed application falls under the Hunt End & Feckenham Middle layer Super Output Area (MSOA), which falls under Redditch Borough Council. The Scoping Report proposes to scope out an assessment of this MSOA as the overlap is 'minimal, temporary, and limited to construction,' with ground above the cabling works to be reinstated to its previous condition following installation. Therefore, a negligible impact upon community health in the MSOA is predicted.</p> <p>On this basis, the Inspectorate agrees that this matter may be scoped out of further assessment.</p>
3.16.2	Paragraph 14.3.7	Protected Characteristics	<p>The Scoping Report proposes to scope out impacts on certain groups with protected characteristics including ethnicity, sex, and religion, on the basis that differential effects on such groups are unlikely to arise as a result of the proposed application. The DCO application is also to be accompanied by an Equality Impact Assessment.</p> <p>On this basis, the Inspectorate agrees that this matter may be scoped out of further assessment, however the ES should provide an exhaustive list of the groups with protected characteristics proposed to be scoped out.</p>
3.16.3	Paragraphs 14.5.3 and 14.5.4	Decommissioning Phase	<p>The Scoping Report states that the likely impacts of the decommissioning phase are largely similar to those associated with the construction phase, and the necessary mitigation measures are proposed to be secured via a Decommissioning Environmental Management Plan to be submitted alongside the DCO application.</p> <p>On this basis, the Inspectorate agrees that this matter may be scoped out of further assessment.</p>

3.164	Table 14-4; Table A14-5	Construction Traffic Impacts Upon Wider Population (Access to Green/Open Space and Healthcare Facilities)	<p>The Scoping Report states that the wider population has access to a broad range of green/open spaces and routes to healthcare facilities and is therefore less sensitive to access impacts arising as a result of construction traffic.</p> <p>On this basis, the Inspectorate agrees that this matter may be scoped out of further assessment.</p>
3.165	Table 14-4; Table A14-5	In-Combination Amenity Impacts (Air Quality, Noise Pollution and Vibration, and Landscape Amenity) Upon Wider Population and Materially Disadvantaged	<p>The Scoping Report states that control measures implemented through the proposed oCEMP will reduce in-combination air quality and noise/vibration impacts upon the wider population and the materially disadvantaged, and landscape changes are likely to be experienced on a 'transient basis' by these groups.</p> <p>On this basis, the Inspectorate agrees that this matter may be scoped out of further assessment.</p>
3.166	Table 14-4; Table A14-5	In-Combination Amenity Impacts (Employment and Income) Upon Protected Age Groups, Mentally/Physically Disadvantaged, Materially Disadvantaged, and Residential Sub-Populations	<p>The Scoping Report states that no differential effects upon the listed sub-populations are anticipated in terms of employment and income.</p> <p>On this basis, the Inspectorate agrees that this matter may be scoped out of further assessment.</p>
3.167	Table 14-4; Table A14-5	Employment and Income Uncertainty Upon Protected Age Groups, Mentally/Physically Disadvantaged, Materially	<p>The Scoping Report states that no differential effects upon the listed sub-populations are anticipated in terms of employment and income.</p> <p>On this basis, the Inspectorate agrees that this matter may be scoped out of further assessment.</p>

		Disadvantaged, and Residential Sub-Populations	
3.168	Table 14-4; Table A14-5	Landscape Amenity Uncertainty Upon Wider Population and Materially Disadvantaged	<p>The Scoping Report states that landscape changes are likely to be experienced on a ‘transient basis’ by the wider population and materially disadvantaged sub-populations.</p> <p>On this basis, the Inspectorate agrees that this matter may be scoped out of further assessment.</p>
3.169	Table 14-4; Table A14-5	Land Take Impacts Upon Wider Population, Protected Age Groups, Mentally/Physically Disadvantaged, and Materially Disadvantaged	<p>The Scoping Report states that indirect impacts in this aspect are addressed through other scoped-in pathways. It is noted that residential sub-populations that are in proximity to the proposed development are scoped-in to the assessment.</p> <p>On this basis, the Inspectorate agrees that this matter may be scoped out of further assessment.</p>
3.16.10	Table 14-4; Table A14-5	Changes in Economic Conditions Upon Protected Age Groups, Mentally/Physically Disadvantaged, Materially Disadvantaged, and Residential Sub-Populations	<p>The Scoping Report states that no differential effects upon the listed sub-populations are anticipated in terms of employment and income.</p> <p>On this basis, the Inspectorate agrees that this matter may be scoped out of further assessment.</p>
3.16.11	Table 14-4; Table A14-5	Changes in WCH Access to Community Facilities, Green/Open Spaces, and Transport User Safety Upon Wider	<p>The Scoping Report states that walking, cycling, and horse-riding (WCH) access impacts arising as a result of the proposed application are not likely to impact upon longer distance trails, and therefore impacts to the wider population and sensitive sub-populations within it are proposed to be scoped out. It is noted that residential sub-</p>

		Population, Protected Age Groups, Mentally/Physically Disadvantaged, and Materially Disadvantaged	<p>populations that are in proximity to the proposed development are scoped-in to the assessment.</p> <p>On this basis, the Inspectorate agrees that this matter may be scoped out of further assessment.</p>
3.16.12	Table 14-5; Table A14-5	Evolving In-Combination Changes in Amenity (Air Quality, Noise Pollution and Vibration) Upon Wider Population, Protected Age Groups, Mentally/Physically Disadvantaged, Materially Disadvantaged	<p>The Scoping Report states that, with the implementation of the appropriate control measures, differential effects upon the listed sub-populations are likely to be limited in extent. It is noted that residential sub-populations that are in proximity to the proposed development are scoped-in to the assessment.</p> <p>On this basis, the Inspectorate agrees that this matter may be scoped out of further assessment.</p>
3.16.13	Table 14-5; Table A14-5	Evolving In-Combination Changes in Amenity (Landscape Amenity) Upon Wider Population and Materially Disadvantaged	<p>The Scoping Report states that landscape changes are likely to be experienced on a ‘transient basis’ by the wider population and materially disadvantaged sub-populations.</p> <p>On this basis, the Inspectorate agrees that this matter may be scoped out of further assessment.</p>
3.16.14	Table 14-5; Table A14-5	Evolving Changes in Economic Conditions Upon Protected Age Groups, Mentally/Physically Disadvantaged, Materially Disadvantaged, and	<p>The Scoping Report states that no notable differential effects upon the listed receptors are anticipated.</p> <p>On this basis, the Inspectorate agrees that this matter may be scoped out of further assessment.</p>

		Residential Sub-Populations	
3.16.15	Table 14-5; Table A14-5	Permanent Changes to the WCH Network Affecting Access to Community Facilities, Green/Open Spaces, and Transport User Safety Upon Wider Population, Protected Age Groups, Mentally/Physically Disadvantaged, and Materially Disadvantaged	<p>The Scoping Report states that walking, cycling, and horse-riding (WCH) access impacts arising as a result of the proposed application are not likely to impact upon longer distance trails, and therefore impacts to the wider population and sensitive sub-populations within it are proposed to be scoped out. It is noted that residential sub-populations that are in proximity to the proposed development are scoped-in to the assessment.</p> <p>On this basis, the Inspectorate agrees that this matter may be scoped out of further assessment.</p>

ID	Ref	Description	Inspectorate's comments
3.16.16	Paragraphs 14.3.9 to 14.3.11	Residential sub-populations	<p>The Scoping Report states that the closest residential receptors to the proposed development are considered as a distinct sub-population for further consideration within the assessment, as they may be vulnerable to more acute impacts. The ES should clearly state how these receptors were identified. Effort should also be made to agree the receptors included within this sub-population with the relevant consultees. The Inspectorate notes a reference to figure 18.2, which is supposed to display the location of these residential clusters, however this appears to have been omitted from the Scoping Report. For the avoidance of doubt, the Inspectorate expects that a figure displaying the location of the identified residential sub-population receptors is included within the ES.</p>

3.17 Glint and Glare

(Scoping Report Section 15)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.17.1	Paragraph 15.8.2	Glint and glare effects on road safety, residential amenity, PRow and other observers – All phases	These matters are proposed to be scoped out of the ES on the basis that the applicant commits to mitigating any significant effects identified as part of the assessment. The Inspectorate considers that insufficient information has been provided on the proposed mitigation, the layout of the scheme and the receptors in proximity to rule out any significant effects. As such, the Inspectorate is not in a position to scope this matter out of the ES. The ES should assess any potentially significant effects occurring to the stated receptors.

ID	Ref	Description	Inspectorate's comments
3.17.2	Paragraph 15.4.2	Study area	The Scoping Report states that a 1km study area for potential ground-based receptors, 5km for unlicensed aviation receptors and 10km for licenced aerodromes would be appropriate for the glint and glare assessment, based on professional judgement. The ES should provide further justification for this study area with reference to a Zone of Theoretical Visibility (ZTV) and based on the maximum extent of likely significant effects. Where possible, the study area should be agreed with the relevant consultation bodies.

3.18 Cumulative Effects

(Scoping Report Section 16)

ID	Ref	Applicant’s proposed matters to scope out	Inspectorate’s comments
3.18.1	N/A	N/A	No matters are proposed to be scoped out of the assessment.

ID	Ref	Description	Inspectorate’s comments
3.182	N/A	Consultation	The Applicant should seek to agree the long list of projects for the CEA with relevant consultation bodies. Any omissions or inclusions should be clearly justified and explained with reference to PINS Advice Note 17: Cumulative effects assessment.

APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

TABLE A1: PRESCRIBED CONSULTATION BODIES

Bodies prescribed in schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended) (the 'APFP Regulations (as amended)')

SCHEDULE 1 DESCRIPTION	ORGANISATION
The relevant parish council or, where the application relates to land in Wales or Scotland, the relevant community council	Willersey Parish Council
	Weston Subedge Parish Council (DET)
	Mickleton Parish Council
	Pebworth Parish Council
	South Lenches Parish Council
	Hanbury Parish Council
	Inkberrow Parish Council
	Offenham Parish Council
	Badsey and Aldington Parish Council
	Bretforton Parish Council
	South Littleton Parish Council
	North and Middle Littleton Parish Council
	Honeybourne Parish Council
	Harvington Parish Council
	Rous Lench Parish Council
	Abbots Morton Parish Council
Kington and Dormston Parish Council	
Stock and Bradley Parish Council	

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Cookhill Parish Council
	Cleeve Prior Parish Council
	Bentley Pauncefoot Parish Council
	Tutnall and Cobley Parish Council
	Alvechurch Parish Council
	Beoley Parish Council
	Feckenham Parish Council
	Salford Priors Parish Council
	Quinton Parish Council
	Sambourne Parish Council
	Bidford-on-Avon Parish Council
	Marston Sicca (Long Marston) Parish Council
	Dorsington Parish Council
	Welford-on-Avon Parish Council
	Temple Grafton Parish Council
	Alcester Town Council
	Studley Parish Council
	Arrow with Weethley Parish Council
	Wixford Parish Council
	Exhall Parish Council
	Mappleborough Green Parish Council
The Environment Agency	The Environment Agency
Natural England	Natural England
The Forestry Commission	North West & West Midlands Forestry Commission

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Historic Buildings and Monuments Commission for England (known as Historic England)	Historic England
The Canal and River Trust	The Canal and River Trust
The relevant Highways Authority	Warwickshire County Council Highways Department
	Worcestershire County Council Highways Department
	National Highways
The Civil Aviation Authority	Civil Aviation Authority
The Health and Safety Executive	Health and Safety Executive
United Kingdom Health Security Agency, an executive agency of the Department of Health and Social Care	United Kingdom Health Security Agency
NHS England	NHS England
Relevant statutory undertakers	See Table 2 below
The Crown Estate Commissioners	The Crown Estate
The relevant police authority	Police and Crime Commissioner for West Mercia
	Police and Crime Commissioner for Warwickshire
The relevant ambulance service	West Midlands Ambulance Service NHS Foundation Trust
The relevant fire and rescue authority	Hereford & Worcester Fire and Rescue Service
	Warwickshire Fire and Rescue Service

TABLE A2: RELEVANT STATUTORY UNDERTAKERS

‘Statutory undertaker’ is defined in The APFP Regulations (as amended) as having the same meaning as in section 127 of the Planning Act 2008 (PA2008)

STATUTORY UNDERTAKER	ORGANISATION
The relevant Integrated Care Board	NHS Coventry and Warwickshire Integrated Care Board
	NHS Herefordshire and Worcestershire Integrated Care Board
NHS England	NHS England
The relevant NHS Foundation Trust	West Midlands Ambulance Service NHS Foundation Trust
Railways	Network Rail Infrastructure Ltd
	National Highways Historical Railways Estate
Canal Or Inland Navigation Authorities	The Canal and River Trust
	Avon Navigation Trust
Civil Aviation Authority	Civil Aviation Authority
Licence Holder (Chapter 1 Of Part 1 Of Transport Act 2000)	NATS En-Route Safeguarding
Universal Service Provider	Royal Mail Group
Homes and Communities Agency	Homes England
The relevant Environment Agency	The Environment Agency
The relevant water and sewage undertaker	Severn Trent
The relevant public gas transporter	Cadent Gas Limited
	Northern Gas Networks Limited
	Scotland Gas Networks Plc
	Southern Gas Networks Plc
	Wales and West Utilities Ltd
	CNG Services Ltd
	Energy Assets Pipelines Limited

STATUTORY UNDERTAKER	ORGANISATION
	ES Pipelines Ltd
	Fulcrum Pipelines Limited
	GTC Pipelines Limited
	Harlaxton Gas Networks Limited
	Independent Pipelines Limited
	Indigo Pipelines Limited
	Inovyn Enterprises Ltd
	Last Mile Gas Ltd
	Leep Gas Networks Limited
	Mua Gas Limited
	Quadrant Pipelines Limited
	Stark Infra-Gas Limited
	National Gas
The relevant electricity generator with CPO Powers	Drayton Manor Farms
	The Rushes (England)
	Feckenham Energy Storage System
	Willows Farm (England)
	Salford Lodge Solar Farm (England)
	Littleton Solar Farm
The relevant electricity distributor with CPO Powers	National Grid Electricity Distribution (West Midlands) Limited
	Advanced Electricity Networks Ltd
	AGR Networks Ltd
	Aidien Ltd

STATUTORY UNDERTAKER	ORGANISATION
	Aurora Utilities Ltd
	Eclipse Power Distribution Limited
	Eclipse Power Network Limited
	Energy Assets Networks Limited
	ESP Electricity Limited
	Fulcrum Electricity Assets Limited
	Green Generation Energy Networks Cymru Ltd
	Harlaxton Energy Networks Limited
	Independent Distribution Connection Specialists Ltd
	Independent Power Networks Limited
	Indigo Power Limited
	Last Mile Electricity Ltd
	Leep Electricity Networks Limited
	Mua Electricity Limited
	Optimal Power Networks Limited
	Stark Infra-Electricity Ltd
	The Electricity Network Company Limited
	UK Power Distribution Limited
	Utility Assets Limited
	Vattenfall Networks Limited
	Edge Utility Networks
	Grid Line Power Networks
	Sphere Energy Connect Ltd
	National Grid Electricity Transmission Plc

STATUTORY UNDERTAKER	ORGANISATION
The relevant electricity transmitter with CPO Powers	National Energy System Operator (NESO)

TABLE A3: LOCAL AUTHORITIES AS DEFINED IN SECTION 43(3) OF THE PA2008

LOCAL AUTHORITY
Wychavon District Council
Redditch Borough Council
Stratford-on-Avon District Council
West Oxfordshire District Council
Malvern Hills District Council
Worcester City Council
Rugby Borough Council
Warwick District Council
Wyre Forest District Council
Bromsgrove District Council
Cotswold District Council
Cherwell District Council
Tewkesbury Borough Council
Solihull Metropolitan Borough Council
West Northamptonshire Council
Coventry City Council
Dudley Metropolitan Borough Council
Birmingham City Council
Herefordshire Council

LOCAL AUTHORITY
Shropshire Council
Oxfordshire County Council
Staffordshire County Council
Warwickshire County Council
Worcestershire County Council
Gloucestershire County Council
Leicestershire County Council

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE:
Abbots Morton Parish Council
Alcester Town Council
Anesco-Drayton Manor Farms
Arrow with Weethly Parish Council
Bidford on Avon Parish Council
Cherwell District Council
Cotswolds District Council
Dudley Metropolitan Council
The Environment Agency
Feckenham Parish council
Forestry Commission
Gloucestershire County Council
Hereford & Worcestershire Fire and Rescue Service
Historic England
Honeybourne Parish Council
Mickleton Parish Council
National Grid Electricity Transmission (NGET)
National Highways
NATS Safeguarding
Natural England
Network Rail
Redditch Borough Council

Rugby Borough Council
Salford Priors Parish Council
South Littleton Parish Council
Stratford-on-Avon District Council
United Kingdom Health Security Agency (UKHSA)
Warwickshire County Council
Warwickshire Police & Crime Commissioner
Worcestershire County Council
Wyre Forest District Council



Response to Arrow Valley Solar EIA Scoping Report (ENO110033)

1. Introduction

1.1 Solar Panels on rooftops, industrial locations, car parks and brownfield sites are fully supported by Abbots Morton Parish Council. However, this application proposes to use Best and Most Versatile soil and will further diminish the Government target for Food Security. The application shows signs of having been rushed to meet government deadlines; it appears to have been prepared without an adequate understanding of the very particular rural character of the area, its largely agricultural economy, and the irreversible long-term damage that would be caused by a semi-industrial, utility-grade power complex on such a massive scale. Much of the Scoping Report is derived from desk-based exercises and 'professional judgements', and as such it demonstrates little or no appreciation of site-specific factors relevant to Abbots Morton, such as the existence of multiple local businesses reliant on the land, recent fire and flood incidents in the parish and on the attractiveness of the area to visitors.

1.2 The Parish Council has felt seriously disadvantaged by the sheer volume and complexity of the information we have been expected to digest (a 400 page report, much of it written in dense technical language (7 pages just consisting of Acronyms!), with five supplementary volumes of maps, diagrams and appendices amounting to a further 400+ pages!), and the very short timescale of 28 days (which included the Easter bank holidays) in which to do so. However, while the developer has had the significant advantages of having submitted previous applications and time to prepare their report as well as access to professionals to do the work for them, we have the unique advantage of local, on-the-ground knowledge of the area, which gives us the authority to challenge the largely desk-based research and professional opinion that underpins much of the developer's report.

1.3 A further point we would like to draw to the attention of the Planning Inspectorate is that we and other Parish Councils have been asked to respond to the Scoping Report on a parish-by-parish basis, but the Report itself addresses the whole project, which spans two counties, three district councils and at least eleven civil parishes (depending on CRC routes). It could be argued that the proposal is in fact four separate solar schemes, connected by very long stretches of cabling (totaling over 20km of 40 metre wide track through the countryside and across the river Avon) and that there should have been four separate reports, one for each site. The task of responding to such a large and complex report within a very limited timescale has been made even harder by having to filter out the material that is not relevant to our particular area. For example, the gazetteer of heritage assets in Appendix A13.2 (Volume III) covers the whole Scheme and the referencing system gives no indication of the site within which each asset falls. In particular, heritage assets are represented as discrete points, without any indication of their wider setting. This is inconsistent with established guidance, which emphasises that the significance of heritage assets often derives from their relationship with the surrounding landscape.

1.4 The report contains a high proportion of specialist material, such as government policies, technical information, design guidelines and process statements which are not readily comprehensible to the volunteer laypersons who typically make up Parish Councils. The deadline for the response has made it virtually impossible for us to engage professional advice to help us interpret the report. This, and the point made above, have significantly disadvantaged us and all other Parish Councils, and made it very challenging for us to put together an adequate response in the time available.

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2. Topics to be Scoped Out (Chapters 5 and 15)

This section contains the Parish Council's response to major topics which are to be scoped out, as described in Chapter 5 of the Scoping Report, Topics to be Scoped Out, and also in Chapter 15, Glint and Glare.

2.1 Glint and Glare (Ref: Scoping Report Chapter 15)

2.1.1 Objection to Ignoring Residential and Road Impacts

The Parish Council strongly objects to the developer's plan in Table 15.8 to "Scope Out" the "Effects upon road safety and residential amenity" from the Environmental Impact Assessment. In other words they intend to ignore a full assessment of glint and glare for local homes and road users. The developer suggests that this assessment is not needed because they will include "mitigation screening" (15.1.2) in the site design to reduce any effects to "not significant" i.e. they will plant hedges to hide the glare. We find this unacceptable for the following reasons:

- Hedges take years to grow; even if the developer plants new hedges, it will take 5 to 10 years before they are tall enough to block the light from solar panels, which we are told will be a maximum of either 3.5m or 4.5m high (Table 4-1). Residents should not have to suffer 'blinding' reflections for a decade while waiting for a hedge to grow; indeed, many may fail or die in that time
- The 'Bird's Eye' View: our landscape is not flat. Many homes and roads sit on higher ground looking down into the valley. A standard hedge at the edge of a field will do nothing to stop glare for a resident looking down onto the panels from a home that is positioned on higher ground or from an upstairs window.

2.1.2 Demand for a Proper Reflection Study

We explicitly demand that "Effects upon road safety and residential amenity" be Scoped In to the full Environmental Impact Assessment. The current scoping report identifies "receptors" (better known to us as people, homes, local roads and bridleways) within a 1km area but then attempts to dismiss the impacts on residents and drivers without a detailed, site-specific study. **We request that the developer conducts a Full Reflection Study for all homes within 1km of the site which must include the solar PV panels, frames and supports.** This should not just be a 'general guess' but a house-by-house check, not a modelled research paper from Pager Power. It needs to be done at multiple times of the year to account for loss of vegetation in the winter and the difference in the position of the sun during the seasons. If the panels are the type that 'track' or move with the sun, the study must show how the reflection changes throughout the day. Moving reflections are more distracting and annoying, and more difficult to avoid, than still ones.

2.1.3 Road and Driver Safety

The project sits alongside busy local roads like the C2010 Alcester Road in Abbots Morton, connecting to the B4088. Again, we are concerned that hedges will not provide adequate screening. At certain times of the day, especially when the sun is low in the morning or evening, the 'flash' from many thousands of panels could temporarily blind and distract drivers. The C2010 road is used as a short cut by commuters and HGVs travelling to and from the Worcester area and M5. The route is popular with drivers trying to avoid congestion on other main roads and is a very busy route at certain times of the day. Vehicles often travel very fast, taking risks on this, in places, very narrow road. The Parish Council already has a request with the Worcestershire County Council that they reduce the speed limit on this dangerous road down from the current 60mph. It is also well used by horse riders, cyclists and crossing deer. Full length school coaches use the route on a daily basis during term time, and buses, tractors and HGVs sit higher than traditional hedge lines so will be subject to the full effect of glint and glare. We insist that the developer provides a professional safety report showing how road users will be protected from being dazzled.

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2.1.4 Impact on Horses and Walkers

The area is very popular with horse riders and walkers making good use (at all times of the year) of the plethora of PRowS. A sudden, bright flash of light can easily spook a horse, which is a serious safety concern for both the rider and other users of public spaces. The developer must assess how glint and glare will affect the Public Rights of Way (footpaths and bridleways) that cross or border the site, especially those where a narrow PRow is bordered on both sides by solar panels, so that there is no escape route for a spooked horse.

2.1.5 Omission of Local Airfields and Aviation Risks

The Parish Council is deeply concerned that the Scoping Report appears to have omitted the following airfields near to us and is glossing over aviation related safety concerns:

- * Wellesbourne Mountford Airfield: a busy hub for flight training and private pilots;
- * Stratford-upon-Avon Gliding Club (Snitterfield): gliders are particularly sensitive to sudden light flashes during low-speed approaches;
- * Bidford Gliding Club (mentioned several times in the Scoping Report but not in the 'Glint and Glare' chapter);
- * Arrow Mill Heliport, which is directly adjacent to the project area.

We insist that these as well as other airstrips which operate in the immediate vicinity of the project are included in a full aviation glare study.

The report also fails to address the unique requirements of low-level flight operations in this rural corridor. The Parish Council requires the developer to formally consult the following bodies:

* **Midlands Air Ambulance Charity (MAAC):** The Air Ambulance frequently lands in fields and on rural road verges in this area to attend to emergencies. Thousands of solar panels could create 'blind zones' for pilots attempting emergency landings in or near the project site. We have evidence of incidents in the recent past where the Air Ambulance has had to land in a field to come to the aid of injured horse riders (e.g. 16 June 2022, Air Ambulance from Strensham). As well as glint and glare causing a potential problem for these pilots, the huge areas covered by panels will mean there is little or no open space available as landing places. Where is an air ambulance supposed to land to come to the aid of an injured walker or horse rider on one of the many well-used bridleways and footpaths near Site 1?

* **The Ministry of Defence (MOD):** Worcestershire is part of UK Low Flying System (UKLFS). Military aircraft regularly fly at low altitudes through Worcestershire as part of general training across the country. The MOD must be consulted to ensure that solar reflections do not interfere with military flight training or night-vision equipment;

* **The National Grid** regularly carries out low level flights to inspect the pylons.

2.1.6 Glint and Glare During Construction

The Parish Council further objects to the proposal to scope out glint and glare impacts during the construction and decommissioning phases (Ref: Table 17-1) which would impact all the above. The developer assumes these impacts are negligible, yet the construction period will span several years. During this time, reflective materials will be stored on-site, and panels will be installed and potentially 'uncovered' before any screening vegetation has even been planted, let alone reached maturity. We request that the Full Reflection Study includes a specific assessment of the construction phase, particularly regarding the risk to road users and residents during the phased rollout of the panels.

2.1.7 Conclusion

By using Modelling provided by such companies as Pager Power to assess the impact of glint and glare, the developers have concluded that neither will have a significant impact, for instance on the people who live here, so that a full assessment is not needed. This approach completely trivialises the effect on residents who, in some cases, will have solar panels close to their homes on up to three sides. As one resident says "Holey Moley, we're going to be living in a sea of solar panels, solar visible from every one of our windows". The glint and glare from this "sea" which could likely move during different times of the day must be properly considered. Asserting that hedges will fix everything is just not good enough..

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2.2 Major Accidents & Disasters (5.3): Battery Safety & Fire Management (Chapter 17), Human Health (Chapter 14)

2.2.1 Large-scale lithium-ion Battery Energy Storage Systems (BESS) are well known to carry a risk of 'thermal runaway', leading to uncontrollable fires and toxic gas release. In the thermal runaway process, just one single battery cell failure can lead to other cell failures and an uncontrollable rise in temperature, which in turn leads to fires, which are almost impossible to extinguish, along with the potential for explosions and the release of highly toxic emissions over wide areas. Current UK firefighting strategy is to let such fires burn out, whilst dampening the surrounding area with millions of litres of water. This is why the National Fire Chiefs' Council has issued national guidelines regarding BESS arrays, which are referred to in the report (e.g. in 5.3.11); these NFCC Guidelines must be adhered to in the detailed site design.

2.2.2 In Chapter 17: Major Accidents and Disasters, the developer argues that solar farms are 'low risk'. They do not provide a dedicated assessment of the risk of lithium-ion battery fires (from the BESS) or wildfires spreading across the arrays. This would be particularly dangerous at Site 1, as the arrays would all but surround the residences at Morton Wood Farm. **This is a major technical omission in the developer's report.**

2.2.3 The Parish Council strongly disagrees with the proposal to scope out 'Major Accidents and Disasters.' Specifically, the report fails to acknowledge a significant site-specific hazard, as exemplified by the 2022 wildfire which occurred within the proposed Site 1 boundary (Warwickshire Fire and Rescue Service incident number: 12282). This fire required five fire appliances and a water carrier, as well as local farmers all working to extinguish the blaze, to prevent it from reaching the six houses at Morton Wood Farm. The fire started near Wood Bevington, the exact location where the developer proposes to install their BESS battery 'village'.

2.2.4 The current agricultural use of the land allows for the creation of emergency fire breaks, as utilized in the 2022 incident. The proposed industrialization of the site with 3.5m high solar arrays, BESS units, and security fencing will:

- Remove the ability to create fire breaks;
- Increase the 'fuel load' through proposed wildflower/grass planting;
- Obstruct emergency fire vehicle access;
- Present a 'Thermal Runaway' risk via the BESS, which threatens nearby residential properties.

2.2.5 **We request that PINS mandates a Site-Specific Fire and Emergency Response Plan (in consultation with local Fire and Rescue Services), a Battery Fire Safety Management Plan and a Wildfire Risk Assessment** as part of the Environmental Impact Assessment. This should include water requirements for firefighting and toxic plume modeling. BESS thermal runaway events can generate contaminated firewater and airborne contaminants with off site impacts. The Response Plan should also include consideration of accessibility to the Sites for fire appliances, taking into account the narrowness of many local lanes. Local fire services in rural areas may not be equipped to handle a lithium-ion fire of this scale. The impact of any fire on local air quality and the 'Stay Indoors' risk for local residents must also be assessed. The ES must include worst case BESS fire scenario modelling, firewater generation and contaminant fate and transport assessment, and an emergency containment and monitoring plan. The ES must demonstrate that risks to human health, groundwater and surface water are not significant or set out robust mitigation.

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2.3 Socio-Economics (5.4): Impact on Local Farmers and Other Businesses

2.3.1 The developers state that they predict no adverse economic effect on the area, on the grounds that the landowners taking part in the scheme will receive lease fees that will raise the average income for the area. However, other farms and businesses that adjoin the scheme but are not part of it, including some who have been renting the land now proposed for solar to grow crops, will lose income, and local employees will suffer. There are also cottages available for holiday lets in the area and these businesses will suffer with such a significant loss of countryside. There are two main issues here: (i) the direct impact of the Scheme on farming and other land-based activities, particularly in the CRCs, and (ii) the indirect impact of the loss of visitors to the area.

2.3.2 The area currently attracts many tourists, day trippers and cycle groups, from local towns and cities and also further afield. Once the Scheme is in operation, the industrialised landscape will no longer be attractive to visitors. Examples of businesses which rely on visitors and will be significantly impacted if visitor numbers drop:

- Local stables business which is located on an affected bridleway. Customers are unlikely to want to ride around miles of solar panels. There is also a show jumping school;
- There is a large, high value farm shop, garden centre, restaurant, gift shop and display garden business located between sites 1 and 2, which attracts shoppers and visitors from many miles away. All approaches to this location will be affected due to the scale of the project;
- There are nineteen AirBnBs within walking distance of Abbots Morton, currently used by walkers and other visitors. With footpaths closed or made less attractive, these walking visitors will go elsewhere and local income from these AirBnBs will be lost;
- There is a Shoot business which uses Ragley land, much of which will become inaccessible under the proposed scheme;
- Pubs, hotels and cafes within this area and the Alcester area will also be affected, as visitor numbers decline;

Cycle groups frequently use the lanes in the area for races, other events and informal rides, and use the local restaurants, pubs and cafes for rest stops and refreshments. Cycle riding will be extremely dangerous, almost impossible during the construction phase and unattractive thereafter.

2.3.3 There are multiple factors that will affect landowners adjacent to the sites, in particular those whose land is crossed by CRCs, whose income is derived from direct use of the land, through farming, riding and other land-based activities. These factors include (but are not limited to):

- Increased flooding risk (see section 2.5 below);
- Damage to un-mapped constraints such as private drainage systems and underground pipes during exploration and construction phases;
- Impact of wildlife displacement (see section 3.2 below);
- Loss of farmland to be leased to the scheme which is currently farmed by other non-participating farmers;
- Trenching for cabling which will disrupt crops and farm access.

2.3.4 The impact of the conversion of large areas of farmland on local jobs must also be taken into account, for example in relation to the farm business which farms approximately 1,500 acres of Ragley Estate land. It takes approximately three full-time staff to farm this amount of land, and we must assume therefore that three full-time salaries will be lost for the proposed 60 years. This does not count the other 3,000 acres that the proposal seeks to cover with panels - generations of farmers are being sacrificed by the proposal.

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2.3.5 In Table 5-8, the developer states: “The Scheme offers landowners an opportunity to diversify their income streams beyond traditional agricultural uses, supporting greater financial resilience” and suggests that this “opportunity” will balance any losses resulting from “potentially reduced agricultural productivity”. By focussing only on the landowners who choose to take part in the Scheme, the Scoping Report completely ignores the very significant impact on other landowners adjoining the Scheme whose income will continue to be derived largely or wholly from land use, through farming and other activities, and on the many farm workers employed on the land. This highly flawed argument is used as the justification for scoping out Socio-economic Effects from the EIA. In the light of the examples we have quoted in section 2.3.2 above, it is also unrealistic to claim that “No Adverse effect on local tourism or shops is anticipated from the Scheme”.

2.3.6 The Parish Council does not accept the developer’s justification for scoping out Socio-Economics from the EIA, based as it is on balancing the gains for the few landowners participating in the Scheme against the very significant losses which will be experienced by many other landowners, farm workers and businesses nearby; any analysis must be based not just on overall gains and losses but also take into account the number of individuals and businesses affected. **The Parish Council requests that Socio-Economic factors be scoped back in, and a properly detailed and fully costed analysis carried out.**

2.4 Climate Vulnerability (5.6)

2.4.1 Climate Vulnerability cannot be scoped out, because of the direct impact of climate change on Fire Risk (see section 2.2 above), due to drier hotter summers, and on Flood Risk (see section 2.5 below), due to extreme rainfall events. The heat generated by the panels will have a local impact on weather conditions in the area, and this needs to be evaluated along with the increased rainfall predicted in section 5.6.16 which will exacerbate local flooding issues which are detailed below.

2.5 Water Environment (5.7): Flood Risk

2.5.1 Section 5.7 states that the flood risk to each sub-Site has been assessed through a desktop review of currently available information, of which the Environment Agency provides a significant proportion. While the Environment Agency flood risk map (available at <https://check-long-term-flood-risk.service.gov.uk/map>) shows the flood risks to the fields of Site 1 and the CRC areas to the east of the village, it does not adequately show the roads that are regularly flooded: at least once every winter, the main Alcester Road is flooded where Piddle Brook crosses under it to the east of Lower Barn Farm, to a depth where it is not possible to drive a car through it. The road into the east end of Abbots Morton village from Morton Spiert Farm also floods several times a year to a similar or greater depth. We have photographs of both stretches of road under water during recent winters (available on request). These flooding events have coincided with flooding in Radford, effectively trapping Abbots Morton residents in the village because roads are blocked in both directions. No mention is made of these flooding events in the Scoping Report.

2.5.2 Section 5.7 also states that “during construction, the Scheme could result in a temporary increase in flood risk on-site and elsewhere... due to soil compaction and the introduction of new impermeable areas”, and that there is a “Potential increase in flood risk to third party land due to increased surface water runoff from new hard standing”. Research has shown that solar panels can increase peak run-off by up to eleven times compared to a natural hillslope if the ground cover is bare soil (Baiamonte et al., 2023); although this effect can be significantly mitigated if healthy grass or vegetation is maintained beneath the panels, there is also the effect of the new impermeable areas to take into account.

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2.5.3 In the light of these acknowledged risks, and the impact of local flooding on landowners' farmed land and dwellings as well as access for residents, the Parish Council is extremely concerned that the Flood Risk has been understated. The existing solar farm at Morton Wood Farm has become so hard by the panels blocking out vegetative growth that during heavy rain the water instantly runs off the ground and causes flooding on farmland **We believe that a standard 'desktop-study' is unacceptable given the local topography, and we request a full Site-Specific Flood Risk Assessment based on physical site testing.**

2.5.4 Currently, flood risk control on farmland around Abbots Morton relies on local farmers checking and regularly clearing out the network of drainage ditches that serve the fields, to prevent floodwater from backing up due to downstream blockages. If any of these ditches become inaccessible due to being enclosed within fencing, local farmers would require access to check and clear the ditches on a regular basis. We request that the EIA includes a statement on how this risk will be managed and the necessary access granted.

2.5.5 Adjacent farms and private abstractions are credible receptors of increased runoff, erosion and waterlogging and must be included in the receptor list and compensation/mitigation plan. These are likely to suffer the worst effects of the flooding caused by the panels. **These must be scoped in.**

2.5.6 Cumulative catchment effects: 1 km desk buffer ignores basin-scale interactions; multiple arrays in a catchment can compound peak flows and must be modelled in full scale detail.

2.5.7 Adjacent landowners as receptors: Adjacent farms and private abstractions are credible receptors of increased runoff, erosion and waterlogging and must be included in the receptor list and compensation/mitigation plan. These are likely to suffer the worst effects of the flooding caused by the panels. The dwellings in Morton Wood Lane will have panels on three sides and face a huge risk of flood from extra runoff. The precarious position of all properties in Morton Wood Lane must be reviewed in great detail as this is untenable. **This needs to be scoped in** (Please see photos below at 2.5.10)

2.5.8 The effects of panel cleaning have been scoped out on the basis that cleaning will be "infrequent" and therefore the effects will "negligible" (Table 5-12). However, no mention is made of the volume of water that will be required to clean the panels; on Site 1 alone, we estimate that there will be over 250,000 panels. As adjacent land will still be farmed, the following should be scoped in to the EIA:

- Volume of water that will be required;
 - Where the water will be sourced from;
- Volumes to be added to the runoff into Piddle Brook and a risk assessment of the additional flooding that this could cause, on Alcester Road where it floods regularly, in Abbots Morton Village and further down the water course at Radford Mill.

2.5.9 The Parish Council asks that the Planning Inspectorate secures enforceable long-term maintenance, monitoring and inspection obligations secured in the DCO with compensation mechanisms for affected landowners.

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2.5.10 Photographs of recent flooding on Morton Wood Lane:



Photograph showing the slope of the land on Morton Wood Lane showing that any extra runoff from panels would flow directly towards the properties.



2.6 Waste and Materials (5.1)

The applicant is dismissive of waste and is repeatedly stating that it should be scoped out. **There is a total failure to consider the full life cycle of the development. This is a significant omission.**

The project will involve the installation of a very large number of photovoltaic panels, together with associated electrical infrastructure and potentially battery storage components. These assets have finite lifespans.

At the end of their operational life, they will generate substantial waste streams, including:

- photovoltaic panels containing complex materials;
- electrical equipment;
- (where applicable) lithium-ion battery components.

The Scoping submission does not meaningfully address:

- the scale of this waste;
- the availability of recycling or disposal infrastructure;
- the environmental risks associated with decommissioning.

In particular, the handling of battery waste — especially where fire-damaged — presents well-documented challenges. The absence of any serious engagement with these issues is inconsistent with the requirement to assess long-term and cumulative environmental effects.

Local Authorities use Section 106 agreements to make the landowner responsible for decommissioning and making good in case the developer fails. **This needs to be included in the scope**

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2.6 Summary of Section 2: Topics to be Scoped Out

Topic/ AVS Ref.	Comments	Justification
Glint and Glare (Chapter 15)	<p>We request that the developer conducts a Full Reflection Study for all homes within 1km of the site, and provides a professional safety report showing how road users will be protected from being dazzled. Both the above should cover the construction as well as the operational phase.</p> <p>The Scoping Report omits a number of local airfields and low-level flight operators; these must be included in the aviation section of the Glint and Glare report in the EIA.</p>	<p>Mitigation measures such as hedge-planting are not sufficient to prevent Glint and Glare effects for local residents and road users with such large panels: hedges take time to grow, and the landscape is undulating rather than flat.</p> <p>All local airfields and low-level flight operators could potentially be affected by the presence of large arrays of solar panels in the vicinity of their flight paths.</p>
Major Accidents & Disasters (5.3): Battery Safety & Fire Management (Chapter 17), Human Health (Chapter 14)	<p>The omission of the potential risks posed by lithium-ion fires (from the BESS arrays) and wildfires is a serious technical shortcoming of the Scoping Report. We request that PINS mandates a Site-Specific Fire & Emergency Response Plan and a Wildfire Risk Assessment as part of the EIA.</p> <p>Worst case BESS thermal runaway and firewater generation modelling (firewater volumes, runoff pathways, containment failure scenarios) should be included.</p> <p>Contaminant fate and transport modelling for battery constituents and firewater to surface water and groundwater receptors.</p> <p>Emergency response, firewater containment and monitoring plans with trigger levels and responsibilities.</p> <p>All these should be Scoped in</p>	<p>A major wildfire on the location of Site 1 in 2022 illustrated the risks that a fire in this area would pose to life and property, risks that will only be exacerbated by factors such as the presence of large BESS arrays, the lack of fire breaks, and the obstruction of fire engine access by fencing. Worst case BESS thermal runaway and firewater generation modelling (firewater volumes, runoff pathways, containment failure scenarios).</p> <p>The scoping document acknowledges BESS fire risk and potential contaminant release but relies on OEMP measures rather than quantified assessment. BESS thermal runaway events can generate contaminated firewater and airborne contaminants with off site impacts. The irreversible leaching of microplastics from panels once in operation needs to be studied in detail to assess the long-term implications on potential contamination hazardous to soil/human health.</p>
Socio-Economics (5.4): Impact on Local Farmers and Other Businesses	<p>The Parish Council requests that Socio-Economic factors be scoped back in, and a properly detailed and fully costed analysis carried out which takes account of the number of businesses and individuals that would be affected, and does not simply average out income across the area.</p>	<p>Socio-Economics cannot be scoped out of the EIA by using the flawed argument that the gains for the few landowners participating in the Scheme compensate for the very significant losses which will be experienced by many other landowners, farm workers and businesses nearby.</p>

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Topic/ AVS Ref.	Comments	Justification
Climate Vulnerability (5.6)	Climate Vulnerability cannot be scoped out.	Climate change will have a direct impact on Fire Risk (see above) due to drier hotter summers, and on Flood Risk (see below) due to extreme rainfall events.
Water Environment (5.7): Flood Risk	The Parish Council believes that a standard 'desktop-study' Flood Risk Assessment, based on data already available, is unacceptable given the local topography, and we request a full Site-Specific Flood Risk Assessment based on physical site testing.	Regular flood events which occur in the Site 1 area and CRC are not mentioned in the Scoping Report, yet they have a significant impact on the local community and farmers, and can only be exacerbated by soil compaction and the creation of new impermeable areas resulting from the Scheme, and the drainage of rainwater from the solar arrays.
Waste and Materials (5.1)	Detailed submission of waste streams at the end of operational life, particularly photovoltaic panels, electrical equipment and lithium-ion batteries. Include Section 106 agreements to make the landowner responsible for decommissioning and clean up	The long-term and cumulative environmental effects have been omitted from the EIA and will have a significant effect. Protection should developers fail during the lifetime of the project

3. Ground Conditions, Contamination, Soils and Agriculture (Chapters 7 and 8)

3.1 Intrusive Ground Investigation and Contaminant Testing

3.1.1 The applicant acknowledges that “No ground investigation works have been undertaken for the Scheme. Therefore, the presence of contamination associated with the potential contamination sources summarised in the baseline is currently unknown / unproven.” (Section 7.7.1). Given this admission, the ES cannot reasonably conclude no significant effects without site specific data. For each scoped out topic below we set out why it must be scoped in, the studies and evidence required, and suggested scoping wording to be included in the Scoping Opinion.

3.1.2 The scoping report records multiple historical landfills, infilled quarries and other potential sources of Made Ground across the Site and within 500 m. Desk sources alone cannot rule out contamination or leachate risks. The Applicant’s own statement that “No ground investigation works have been undertaken” demonstrates material uncertainty.

3.1.3 Historical landfills and infilled pits are recorded on and near the Site which are potential recognised sources of landfill gas. The Applicant’s assumption that ventilation or temporary works will prevent gas risk is unsupported without monitoring. Ground gas can present acute safety risks and long term migration pathways to off site receptors.

3.1.4 The Applicant proposes soil handling and reinstatement but provides no baseline soil structure, topsoil/subsoil depths, or handling trial data. Clay rich soils and heavy construction plant can cause irreversible soil structural damage and long term productivity loss. We request that the ES must include a full soil resource survey, soil handling trials, land drainage/services impact and a compaction risk assessment. The ES must set measurable reinstatement targets and secure the SMP and monitoring by DCO requirement.”

3.2 Longterm Soil Contamination

3.2.1 Solar panels are recognized as a potential source of microplastic pollution, primarily through the degradation of components during their 25-30 year lifespan and at the end-of-life disposal stage. Materials such as polyvinyl chloride (PVC), polyethylene (PE), and polypropylene (PP) used in cable insulation and panel components can break down over time as a result of weathering, releasing microplastics into the environment, and in particular into the soil under the panels and through which the cables pass. There is as yet little published research into the impact of microplastics on farming, but a doctoral thesis completed recently by a student at Staffordshire University (*Harrison, 2022*) provides strong evidence that microplastics in high concentrations can change the germination, development, and reproduction of crop species i.e. will impact crop yields.

3.2.2 The 60 year length of the Scheme is excessive, and because solar panels are still a relatively new technology, there is insufficient evidence available to measure the impact the presence of solar panels, BESS units and other infrastructure will have on the soil over such a long period. We understand that conventional solar panels have a polymer backsheet, a PET plastic film, which under UV radiation and chemical attack from the encapsulant, degrades throughout the operational lifetime of the panels, releasing microplastic fragments into the agricultural soil beneath. Research suggests that the prevalence of microplastics in the soil on a solar energy site using conventional panels will increase exponentially over the first thirty years, and it seems reasonable to assume that the process will continue to accelerate. Once this has occurred, there is no field-scale technology that can remediate microplastic-contaminated agricultural soil; the contamination is permanent.

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3.2.3 The Scoping Report contains no mention of microplastics, but we are told that the developer intends to install bifacial monocrystalline solar panels (Table 4-1); the materials to be used for the connection cables are not stated. The Parish Council requests that further work be done as part of the Environmental Impact Assessment to examine the expected contamination effects (with particular reference to microplastics) of the chosen type of solar panels, connection cables and associated infrastructure on the soil, and that the developer provides a clear statement, backed up by scientific research, of the expected risks of degradation of agricultural soil quality over the lifetime of the scheme.

3.2.4 Unless the quality of the agricultural land can be guaranteed not to degrade through the leaching of microplastics and/or other contaminants into the soil, the developer's claim that the land can be returned to agriculture after sixty years must be regarded as completely unrealistic, and the Environmental Impact Assessment must therefore be based on the assumption that the 4,350 acres of land used for the Scheme will be permanently lost to agriculture. Under these conditions, the loss or alteration of agricultural activities associated with the Scheme cannot be described as "temporary", nor can it be claimed that "the land will be reinstated, enabling the resumption of previous agricultural uses", after decommissioning of the Site.

3.3 Soil Organic Carbon Baseline and Carbon Stock Change

3.3.1 The Applicant's assumption of low carbon soils is based on mapping only, with an increase in regenerative agriculture in U.K. farmland in the last 10 years (which sequesters carbon in the soil) means that the mapping is incorrect and outdated. Soil organic carbon loss from land use change can be material to the project's carbon balance and to national carbon accounting. The ES must include soil organic carbon baseline sampling and a carbon stock change assessment by an independent party. Where losses are material, the ES must set out mitigation or offset measures and monitoring.

3.4 Agricultural Land Classification (Post-1988 ALC) and Best and Most Versatile (BMV) Land Assessment

3.4.1 The scoping report uses provisional ALC mapping and states that detailed surveys are required to subdivide Grade 3 into 3a/3b. Loss of BMV (Grade 1–3a) is a material planning consideration and Natural England consultation may be required where >20 ha is affected. It is known that certain supply chains for arable crops heavily rely on parcels of land that are put forward for the solar panels. This will have significant effects on food supply if the land is taken out of production therefore individual assessment of production capability of land needs to be extensively investigated rather than just relying on ALC. Loss of production from land assigned for solar panels needs to be studied as to what effect it will have for the economics of each county. The ES must include post 1988 ALC field surveys and an appraisal to include the study of crop yields over the last 10 years on affected parcels. If BMV loss exceeds relevant thresholds, the ES must include Natural England consultation evidence and justification."

3.5 Soil Functions and Ecosystem Services Assessment

3.5.1 The Applicant has not assessed soil functions (water regulation, biodiversity support, pollination services) on the basis that soils do not support statutory features. Ecosystem services are broader than statutory designations and can be materially affected. The ES must include a soil functions and ecosystem services assessment with measurable indicators and mitigation where services are degraded

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3.6 Unexploded Ordnance (UXO) Desk Study and Targeted Geophysical Survey

3.6.1 There were 22 WW2 airfields (16 in Warwickshire and 6 in Worcestershire). Coventry and Birmingham were high priority targets at the time. The Applicant's desk assessment using high level maps is insufficient to rule out UXO risk. UXO discovery can cause major safety, environmental and programme impacts. Given the proximity to airfields used during World War 2 – UXO cannot be deemed as low without extensive investigation. The ES must include a professional UXO desk study and any indicated geophysical survey and UXO mitigation plan; UXO risk must be treated as a potential significant effect until addressed.

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3.7 Summary of Section 3: Ground Conditions, Contamination, Soils and Agriculture (Chapters 7 and 8)

Topic	Comments	Justification
Intrusive Ground Investigation and Contaminant Testing	<p>Required studies: An intrusive ground investigation across all solar panel sites (trial pits and boreholes) targeted at historical landfill/quarry locations and representative areas of Made Ground Laboratory chemical testing of soils and groundwater for heavy metals, hydrocarbons, asbestos, PFAS, leachate indicators (ammoniacal nitrogen, chloride), and other relevant contaminants Multi season ground gas monitoring (minimum three visits across different seasons) at representative boreholes across all solar panel sites. Ground gas risk assessment (to CIRIA/BS guidance) assessing risk to construction workers, future maintenance staff, buried assets, BESS enclosures and nearby properties. Gas migration modelling where appropriate and specification of mitigation (vented foundations, gas membranes, gas management plan).</p>	<p>The ES must include the results of a targeted intrusive ground investigation and contaminant testing across all solar panel sites together with a CSM and risk assessment. Until such data are provided, the ES must treat contamination and leachate as potential significant effects and present mitigation options and costed remediation strategies The ES must include multi season ground gas monitoring and a full gas risk assessment. Ground gas shall be treated as a potential significant effect until monitoring demonstrates otherwise; mitigation options must be presented and costed in the ES</p>
Longterm Soil Contamination	<p>The Parish Council requests that further work be done as part of the EIA to examine the expected contamination effects (with particular reference to microplastics) of the chosen type of solar panels, connection cables and associated infrastructure on the soil over the proposed sixty-year lifetime of the Scheme.</p>	<p>Solar panels are recognized as a source of potential microplastic pollution, and no statement has been included in the Scoping Report on microplastics. Unless the quality of the agricultural land can be guaranteed not to degrade through the leaching of microplastics and/or other contaminants into the soil, it is unrealistic to claim that it can be returned to use as farmland after decommissioning.</p>
Soil Organic Carbon Baseline and Carbon Stock Change	<p>Soil organic carbon sampling across representative fields and habitats to be done. Carbon stock change assessment for construction, operation and decommissioning scenarios. Identification of mitigation/offset measures where losses are material.</p>	<p>The ES must include soil organic carbon baseline sampling and a carbon stock change assessment by an independent party. Where losses are material, the ES must set out mitigation or offset measures and monitoring</p>

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Topic	Comments	Justification
Agricultural Land Classification (Post 1988 ALC) and Best and Most Versatile (BMV) Land Assessment	<p>Required studies: Full post 1988 ALC field surveys across all affected land parcels and CRC working widths. ALC based alternatives appraisal demonstrating avoidance of 3a where practicable Evidence of Natural England consultation if BMV loss thresholds are met Inclusion of ALC survey results and alternatives appraisal in the ES. Request data from all landowners on crop yields over the last 10 years from affected land parcels and end markets for their produce to gain a wider impact this will have</p>	<p>The ES must include post 1988 ALC field surveys and an appraisal to include the study of crop yields over the last 10 years on effected parcels. If BMV loss exceeds relevant thresholds, the ES must include Natural England consultation evidence and justification</p>
Soil Functions and Ecosystem Services Assessment	<p>Soil functions assessment (infiltration, habitat support, biodiversity indicators) and an ecosystem services appraisal for representative fields. Assessment of agrivoltaics or grazing proposals against soil function retention and their actual practical implementation. Often once operational they are never implemented. Need to allow for fines for not delivering intended outcomes</p>	<p>The ES must include a soil functions and ecosystem services assessment with measurable indicators and mitigation where services are degraded</p>
Unexploded Ordnance (UXO) Desk Study and Targeted Geophysical Survey	<p>Required studies: Professional UXO desk study by a qualified UXO consultant. Where indicated, targeted geophysical survey and, if necessary, a UXO mitigation and safe works plan</p>	<p>The ES must include a professional UXO desk study and any indicated geophysical survey and UXO mitigation plan; UXO risk must be treated as a potential significant effect until addressed</p>

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4. Historic Environment (Chapter 13)

4.1.1 Arrow Valley Solar have identified (13.3.4) 8 scheduled monuments, 222 listed buildings, 2 registered parks and gardens, and 9 conservation areas. The area is rich in history and we are shocked and disappointed that the developers reaction to this huge amount of heritage is purely to assess a value and apply a mitigation. The conservation areas are great examples of history and many coaches of school children as well as historians visit the areas. Mitigation cannot be unlimited! The historical significance must be maintained and addressed, not mitigated and dismissed. Independent professional advice, approved by all interested parties, must be sought to ensure that the construction as well as the placement of panels and batteries does not destroy any heritage. Accordingly we believe that there must be a minimum of 1km distance between the heritage assets and the solar panels or batteries which should be included in the Environmental Assessment.

4.1.2 The applicant states (5.7.18) "There is one Site of Special Specific Interest (SSSI) in the study area, Broom Railway Cutting, which is located 500 m south of Broom. This is in favourable condition and has no water pressures or dependencies and is not considered further in this assessment." We ask that as it is, indeed, a site of Special Specific Interest it must not be dismissed so casually from the assessment. It needs to be Scoped in to the assessment and have protection to make sure that the favourable condition is maintained.

4.1.3 The enclosures north of Salford Priors (NHLE 1005721) mentioned in 13.3.6 are given high significance by the applicant and we wish to make sure that Independent professional advice, approved by all interested parties, must be sought to ensure that it has the protections demanded such a significant site. We request that such protections are included in the EIA.

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4.4 Summary of Section 4: Historic Environment (Chapter 13)

Topic	Comments	Justification
Historic Environment	Such fine examples of heritage assets must be assessed and protected by Independent Professional advice to ensure they are retained for future generations rather than having to apologise for their demise. We request the EIA includes a minimum of 1km distance between the heritage assets and the solar panels or batteries.	Heritage Assets are defined and protected by the Planning (Listed Buildings and Conservation Areas) Act 1990. The Heritage Assets affected by this proposed development include scheduled monuments, listed buildings, registered parks and gardens, and Conservation Areas. It is imperative that these have the full protection they demand for future generations.

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5. Other Major Areas of Concern

This section lists other major areas of concern which the Parish Council believes have not been adequately addressed in the Scoping Report.

5.1 Wildlife Displacement: Effects on Livestock and Road Accidents

5.1.1 The Scoping Report fails to assess, or even mention, the indirect biosecurity impacts of large-scale wildlife displacement. We have a large population of free roaming wild deer (fallow, roe and muntjac) in this area, which typically shelter in woodland during the day but come into the fields to graze at dusk. The installation of perimeter fencing across 1,500+ hectares will create a 'barrier effect,' forcing wild deer populations onto adjacent agricultural holdings, where they will compete with livestock for grazing. For holdings maintaining high-value pedigree Hereford cattle, this displacement also significantly elevates the risk of Bovine TB transmission as well as the loss of grazing. We request that the Environmental Impact Assessment includes a specific Agricultural Biosecurity Impact Assessment to model deer displacement patterns and the associated risks to neighbouring livestock businesses.

5.1.2 There is also the potential for wild deer to become trapped in areas of woodland surrounded by fenced off areas of solar panels, so that their only means of escape is by road, thereby increasing the incidence of road traffic accidents involving deer, particularly if there are loudspeaker warnings should they approach the perimeter fencing.

5.2 Hedgerow Loss and Biodiversity

5.2.1 There are several references to "some minor loss of hedgerow and grassland field margins" (e.g. in paragraph 6.6.2), and to gaps being required in hedgerows for access and cables. We request that the EIA include a very detailed statement of the impact of the design of the site on existing hedgerows and field margins, bearing in mind that (a) hedgerows are a Priority Habitat for wildlife and (b) their effectiveness as vital corridors providing connectivity between habitats in an increasingly fragmented natural landscape will be seriously undermined by the existence of gaps. It seems likely that the relatively small field sizes in this area will prove uneconomic for fencing and solar panel infrastructure, and we would like the EIA to contain a clear statement of what "some minor loss" will actually entail, as part of the detailed site layout design.

5.2.2 Related to this point, the Scoping Report lists a number of mitigation measures which could be implemented to offset potential biodiversity losses, including the planting of additional hedges, meadows and trees; the creation of permissive paths; and the placement of beehives, bird boxes and bat boxes. It also states that "Areas within the Site that will not be developed with infrastructure will be used to provide appropriate mitigation and enhancement measures as required to lessen the environmental impact of the Scheme" (section 4.3.27). We request that the EIA should state what proportion of each Site will be allocated to mitigation and enhancement measures, also as part of the detailed site layout design.

5.3 Preservation of Footpaths, Ancient Paths and Bridleways

The conservation areas of Abbots Morton, Rous Lench, Salford Priors and Church Lench are all interlocked by the Footpaths, Ancient Paths and Bridleways. We are concerned that these should not be lost or become unfit for purpose by having 2m or 3m high fencing so close that people and, more particularly, horses either cannot or will not use them due to the industrial appearance of the fences enclosing the solar panels and any automated security warnings. The connectivity of the Public Rights of Way must continue to be accessible for all to use in safety. They are **Public** rights of way and have to be scoped in. The plan submitted by the applicant has not put in the full route for Bridleway 555(B) and we ask that this is corrected.

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5.4 Heat Retention Around Panels

As the quantity of solar farms increases, both in the UK and globally, more evidence is becoming available that large arrays of panels can affect heat levels in the surrounding area, particularly on hot summer nights. This is due to the panels cooling down and dissipating accumulated heat. The Low (WR7 4LU) is essentially a valley surrounded by hills, trapping hot air. We would like a full analysis of this effect, giving evidence of all views.

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5.5 Summary of Section 3: Other Major Areas of Concern

Topic	Comments	Justification
Wildlife Displacement: Effects on Livestock and Road Accidents	We request that the Environmental Statement includes a specific Agricultural Biosecurity Impact Assessment to model deer displacement patterns and the associated risks to neighbouring livestock businesses, and also to consider the likely increase in road accidents involving deer.	The area has a large population of wild deer, which will be displaced by the barrier effect of large fenced-off areas onto adjacent grazing land and onto local roads.
Hedgerow Loss and Biodiversity	The 'minor loss' of hedgerows must be explicitly quantified in the full EIA, and the issue of gaps addressed.	The retention of existing hedgerows and field margins is repeatedly cited in the Scoping Report as a mitigating factor with regard to loss of habitat for wildlife, but this will not have the desired effect if a significant proportion of hedgerow is lost and/or gaps are introduced.
Preservation of Footpaths, Ancient Paths and Bridleways	The connectivity of the Public Rights of Way must continue to be accessible for all to use in safety	They are Public rights of way and have to be scoped in
Heat Retention Around Panels	The Parish Council requests an analysis of the effects of heat retention in solar panels on the microclimate of the surrounding area.	There is evidence that large arrays of panels can affect heat levels in the surrounding area, particularly on hot summer nights, due to the panels cooling down and dissipating accumulated heat.

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6. Comments on Scope (Table 17-1)

We have based our remaining comments on the summary Table 17-1 'Topics to be scoped in/out of the EIA', with reference to other sections of the EIA Scoping Report as appropriate

Topic	Comments	Justification
6.1 Ecology and Biodiversity	<p>6.1.1 There is only one very brief mention (under 'Pests and Diseases') of invasive non-native species (INNS). We would expect to see a risk analysis as to whether INNS species are likely to be present, and mitigation measures to be adopted if they are.</p> <p>6.1.2 Table 6-2 implies that breeding bird surveys during the operational phase will be scoped out, despite the permanent loss of key habitats. Breeding bird surveys must be scoped in at all phases of the project.</p> <p>6.1.3 The Scoping Report fails to acknowledge the presence of protected raptors which are known to use the area for nesting and foraging. We request that the Environmental Statement includes a specific Raptor Survey to ensure that nesting sites are protected by adequate buffers (exceeding the standard 10m-30m) and that the loss of foraging habitats for all local raptor species is fully mitigated.</p> <p>6.1.4 'Other priority mammals' should not be scoped out, in particular brown hare.</p> <p>6.1.5 Aquatic invertebrates should not be scoped out.</p>	<p>6.1.1 Off road vehicle movements, the use of digging machinery and other activities which disturb the soil raise the risk of accidental transmission and spread of spores, seeds etc. from INNS present on and around the Sites.</p> <p>6.1.2 Large areas of grassland habitat will be permanently lost, leading to the loss of nesting sites for ground-nesting birds such as skylarks (a red-listed species).</p> <p>6.1.3 The following raptor species have all been recorded within Site 1: red kite, buzzard, goshawk, and hobby - as well as kestrel on roadside verges adjoining Site 2. In addition, there is an active red kites' nest in woodland adjoining Site 1 (above Commissioners' Wood).</p> <p>6.1.4 Brown hare (which are frequently seen in this area) are primarily grassland and field margin users, so most of the key habitat for this species will no longer be available to them within the Sites.</p> <p>6.1.5 Many terrestrial invertebrates spend the first part of their lives as aquatic invertebrates e.g. mosquito and midge larvae (mosquitoes and midges are an essential summer food source for bats and many songbirds), and damselfly and dragonfly larvae, so one cannot be included without the other.</p>

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Topic	Comments	Justification
6.2 Ground Conditions and Contamination	<p>New sources of contamination arising from construction activities and from damage to solar panels during operation are scoped out. The developer states: “the operation of the Scheme may introduce new sources of contamination” but assumes that any effects can be adequately mitigated by adopting best practice. New sources of contamination could pose a previously unknown risk, for which existing best practice is inadequate, and should not be scoped out.</p>	<p>The developer has a responsibility to ensure that any materials used are completely safe, in order to safeguard the environment and human health. Scientific research should be completed to ensure that all materials are safe, in order to provide reassurances to the local community that there will be no detrimental interactions between the materials, the environment and human health. If this topic is not scoped in, humans and the environment could be exposed to untested and unsafe technology.</p> <p>Please also see notes above under 3.1 Longterm Soil Contamination.</p>
6.3 Soils and Agriculture	<p>6.3.1 The report (in Table 8-4) acknowledges that a massive portion of the site (over 1,500 hectares) is likely Grade 2 or Grade 3 agricultural land, but (i) admits that this is based on <u>provisional</u> ALC grades, as no survey has been done since 1988, and (ii) the existing data does not make the important distinction between Grade 3a and Grade 3b.</p> <p>We request that the developer completes a full Agricultural Land Classification (ALC) survey, with a density of one auger sample per hectare, across the entire site and includes the complete set of results in the Environmental Impact Assessment.</p> <p>6.3.2 The assessment of the effects of construction on agricultural land holdings is scoped in, but soil resources, agricultural land, soil functions and ecosystems services and soil carbon during construction, and all receptors during operation and decommissioning are scoped out. We disagree with this, and request that soils and agriculture be scoped in at all stages of the project.</p>	<p>6.3.1 Without up-to-date data at the requested level of detail, high-quality Grade 3a (BMV) land can be ‘hidden ’by averaging it out with lower-quality 3b land. The Parish Council needs to know exactly how much ‘Best and Most Versatile’ food-producing land would be lost.</p> <p>6.3.2 The descoping is based on the argument that “impacts are expected to be temporary and reversible, as all soils will be reinstated following construction and decommissioning” (Table 8-5), but we do not accept that the effects will be either temporary or reversible. Please see notes above under 3.1 Longterm Soil Contamination.</p>

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Topic	Comments	Justification
6.4 Climate Change	<p>The assessment of greenhouse gases is scoped in during the operation stage, but not during construction and decommission. The assessment of GHG should be scoped in at all stages of the project.</p>	<p>GHG will be produced on a vast scale during construction, decommissioning and during the replacement of panels. The list of activities which will generate GHG includes but is not limited to the following:</p> <ul style="list-style-type: none"> • Thousands of diesel HGV journeys; • The powering of construction equipment; • The production and use of concrete; • The extraction and production of roadstone; • The construction of BESS and substations; • The construction of other infrastructure; • The manufacture of thousands of solar panels imported from China; • The GHG cost of transporting the solar panels from China; • The GHG cost of cabling manufacture; • The use of machinery and HGVs at the decommissioning stage. <p>This analysis should be scoped in to give transparency when considering any claim that solar on this scale is a green technology. Analysts have reported that the Great North Road Scheme in Nottinghamshire will produce between 1.8 and 2.6 million tonnes more carbon dioxide than it will save over its lifetime. The developer, Elements Green Trent, has revised its carbon calculations three times.</p>
6.5 Transport and Access	<p>Construction traffic generation, construction vehicle routing, the effects on the LRN, impacts on NMUs and impacts on public rights-of-way during the construction phase are scoped in. Routine operational traffic and access effects and non-routine operational maintenance during the operational phase are not scoped in. All elements during the decommissioning phase are not scoped in. Transport and access at all phases of the life of the solar plant should be scoped in.</p>	<p>On decommissioning, there will be as much disruption to the LRN and access routes as when constructed, as a result of the removal of equipment. Residents would be affected in the same way. Maintenance can involve many vehicle passes. Replacement of solar panels and/or battery storage on such a large site would be a major transport and access project, mirroring the construction phase. It should therefore be scoped in.</p>

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Topic	Comments	Justification
6.6 Noise and Vibration	<p>6.6.1 Scoped out:</p> <ul style="list-style-type: none"> • Traffic vibration during the construction phase; • Traffic noise and vibration and operational equipment; • Vibration during the operational phase; • Noise and vibration during the decommissioning phase. <p>Noise and Vibration should be scoped in at all phases of the project.</p> <p>6.6.2 The report suggests focussing noise assessments on receptors within 100m of the site (Chapter 11). We request that the noise and vibration assessment area be extended to all residential properties within 500m of the site boundary and construction access routes.</p> <p>6.6.3 When the developer carries out baseline noise assessments on Site 1, we require input into the choice of monitoring stations.</p> <p>6.6.4 other sensitive receptors are required, including:</p> <ul style="list-style-type: none"> • areas valued for tranquillity; • recreational users; • ecological receptors sensitive to noise disturbance 	<p>6.6.1 We do not accept the logic of scoping out traffic vibration and noise.</p> <ul style="list-style-type: none"> • Some access tracks are not designed to take the weight of HGVs; • Old properties along possible access tracks do not have full foundations and damage may occur; • Some properties are very close to access tracks; • There are many Grade 2 listed properties are nearby; • Decommissioning noise and vibration could cause damage to buildings and access tracks and would be intrusive for residents over a sustained period; • During panel replacement, the noise and vibration with possible property damage would again occur over a sustained period. This should be scoped in. <p>6.6.2 ‘Piling’ (driving the steel legs for panels into the ground) is only one example of an activity which creates high-impact noise that carries significantly further than 100m in quiet, rural environments.</p> <p>6.6.3 The proposed assessment point at WR7 4LU is by the sewage plant, which can be heard by properties when there is a northerly wind. The prevailing wind is from the south. Morton Wood Farmhouse is the most likely property to be affected by noise associated with the solar plant, and so monitoring should take place on its southerly edge, where noise from the site will be carried by the prevailing wind.</p> <p>6.6.4 The identification of receptors appears to focus primarily on residential properties. This excludes other sensitive receptors</p>

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Topic	Comments	Justification
6.7 Landscape and Visual	<p>The developer has identified a suite of potential representative viewpoints (Table 12-1, Figure 12.4) during the initial Site walkover and informed by Ordnance Survey and Google mapping, as well as recent informal discussions with Host Authorities. This largely desk-based exercise has not so far included any consultation with the local community. The Parish Council requests the right to nominate at least five specific local viewpoints within the Abbots Morton parish which adequately represent the community's daily experience.</p>	<p>The developer's selection of viewpoints may not include viewpoints that represent the community's daily experience. By choosing our own viewpoints, we can ensure that the 'worst-case' visual impact is captured and taken into account. key receptors, particularly private residential views or elevated vantage points, have been underrepresented. In addition, there is no clear indication that cumulative visual effects will be assessed. Given the proliferation of solar and BESS schemes in the region, this is a significant omission. The combined effect of multiple developments can be qualitatively different from the effect of any one scheme in isolation</p>
6.8 Historic Environment	<p>Indirect impacts to designated assets, direct and indirect impacts to non-designated assets, direct impacts to archaeological remains and historic landscape associated with solar panel sites, BESS, and sub-stations are scoped in during the construction and operational phases, but scoped out during decommissioning.</p> <p>Indirect impacts to designated assets, direct impacts to non-designated assets, direct impacts to archaeological remains and historic landscape associated with CRCs are scoped in during construction phase work, but scoped out during decommissioning and operation - including during maintenance and panel replacement.</p> <p>All three phases should be scoped in, both for the solar sites and for the CRCs.</p>	<p>We do not accept the logic of scoping out. Any damage to the historic environment incurred during the construction phase will not be temporary but will persist throughout the operational phase, and more damage could be done during routine replacement of solar panels/battery storage, and/or when removing equipment during decommissioning. Land that is used for CRCs should be scoped in throughout all phases to protect historic assets. All project plans should respect the historical heritage of the area at all phases.</p>

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Topic	Comments	Justification
6.9 Population and Human Health	Access to green space and open space, access to healthcare facilities for wider population, and landscape amenity for wider population and materially disadvantaged have all been scoped out. This decision does not take account of the value of the area as a recreational resource for people from local towns and cities, and we request that Population and Human Health be scoped in.	This area is attractive to people from local towns and cities who come for recreational reasons. The size and spread of the project limits green spaces for WCH. Disadvantaged children visit the local stables for horse-riding on the bridleways. Walkers, riders and cyclists come here for the landscape amenity, using the many PRoWs across site 1 and they should be scoped in. Please see section 2.3: Socio-Economic Impact above for more detail.
6.10 Glint and Glare	<i>See Section 2.1 above</i>	<i>See Section 2.1 above</i>
6.11 Cumulative Effects	We request a ‘Cumulative Effects’ assessment that specifically includes all other solar farms (planned or operational) within 15km, as well as the impact of other major infrastructure projects (road, rail etc.) and local housing allocations.	While one moderate-sized solar site in an area might be acceptable, the ‘ringing’ of villages with multiple industrial energy and construction sites creates a shrinking effect on those communities, and a cumulative loss of open countryside, for human recreation and the benefit of wildlife, that is far more damaging.

7. STRATEGIC CONTEXT OMITTED FROM THE SCOPING SUBMISSION

A major omission from the Developer's documentation is the absence of any meaningful engagement with the **wider energy system context** in which the project sits. This omission is not peripheral; it goes directly to the question of whether the project's environmental impacts can be justified.

7.1 Oversupply of Solar and Battery Storage Infrastructure

The UK energy sector has, in recent years, experienced a very substantial expansion in the pipeline of both solar generation and Battery Energy Storage Systems (BESS). Data from the Renewable Energy Planning Database (REPD) and National Energy System Operator (NESO) demonstrates that:

- the volume of consented, under-construction, and proposed solar capacity is already extremely large;
- similarly, the BESS pipeline significantly exceeds near-term system requirements.

This is particularly relevant in the Midlands, where there has been a marked clustering of large-scale solar and storage schemes. The cumulative effect of this clustering is not simply additive; it is transformative, leading to:

- progressive industrialisation of rural landscapes;
- erosion of agricultural character;
- increasing pressure on grid infrastructure.

Despite this, the Scoping Report proceeds on the implicit assumption that additional solar capacity is inherently beneficial and required. There is no assessment of whether the project contributes meaningfully to national or regional need, nor any acknowledgement that additional schemes may represent duplication rather than necessity.

This omission undermines the ability of the EIA to properly assess cumulative effects, because it fails to recognise that the project is part of a system already approaching saturation.

7.2 Grid Connection Reform and Deliverability

The omission of system context is most critical in relation to grid connection.

In December 2025, the UK implemented significant reforms to the electricity grid connection queue, fundamentally altering the basis on which projects are able to connect. These reforms prioritise:

- projects that are demonstrably deliverable;
- projects with realistic construction timelines;
- the removal or deprioritisation of speculative schemes.

The Developer's Scoping submission contains no reference to these reforms. It proceeds as though connection to the grid is a given.

However, this assumption is no longer tenable.

Local evidence strongly suggests that the Feckenham Substation, which is designated for this project, is subject to significant capacity constraints. Indicative timelines suggest that connection may not be achievable until the mid-2030s at the earliest.

This has profound implications:

- The environmental impacts of the scheme (land use change, landscape effects, ecological disturbance) would occur immediately upon construction.
- The purported benefits (renewable electricity generation) may be delayed for a decade or more, or may not materialise at all if the project is deprioritised within the reformed queue.

In these circumstances, the scheme must be regarded, at least in part, as speculative in its deliverability. Yet the EIA scoping does not address this issue.

An EIA must consider not only environmental effects, but also the realistic context in which those effects are justified. Without an assessment of grid deliverability, the balancing exercise inherent in the NSIP process is fundamentally incomplete.

**Abbots Morton Parish Council:
Response to Arrow Valley Solar EIA Scoping Report (EN0110033)**

7.3 Failure to Consider Alternatives

Schedule 4 of the EIA Regulations requires a description of reasonable alternatives studied by the developer.

The Scoping submission does not demonstrate that:

- alternative sites have been considered;
- alternative grid connection strategies have been evaluated;
- lower-impact locations have been assessed.

This omission is particularly concerning in light of the oversupply and grid constraints outlined above. If capacity is already abundant and connection uncertain, then the question of whether this scheme should be located elsewhere is obvious.

7.4 Volume III Appendices: Methodology and Scope

The appendices set out the proposed methodologies for assessment and identify topics that the Developer considers can be scoped out or treated in a limited way.

A recurring theme is the reliance on “standard mitigation” to justify the exclusion or downgrading of impacts. This approach is not consistent with best practice. Impacts should be assessed before mitigation is applied, not assumed to be capable of mitigation at the outset.

There is also a tendency to limit the scope of assessment for:

- human health;
- glint and glare;
- construction effects.

These topics are either treated superficially or deferred, rather than being robustly defined at the scoping stage.

Final Statement

This report is submitted by Abbots Morton Parish Council and is of **fundamental importance** to the Planning Inspectorate’s consideration of the Scoping Opinion for Project EN0110033.

It is respectfully submitted that:

Unless the scope of the Environmental Impact Assessment is significantly expanded and strengthened at this stage, the resulting Environmental Statement will be inherently deficient, and the integrity of the entire NSIP examination process will be compromised.

The Inspector is therefore requested to give this report **careful and detailed consideration**, and to ensure that the Scoping Opinion requires a **comprehensive, precautionary and fully detailed assessment** of all likely significant effects.

We would also like to state that, as said at the beginning of this report, we have only been given 28 days to respond to 818 pages submitted by the applicant and we reserve the right to submit further observations at a later date.



Office of the Town Clerk

ALCESTER TOWN COUNCIL

Globe House
Priory Road
Alcester
Warwickshire
B49 5DZ
Tel: 01789 766084
Email: clerk@alcester-tc.gov.uk

23 April 2026

Joseph Jones
Environmental Advisor
Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough
SL1 4PN

By email to: ArrowValleySolar@planninginspectorate.gov.uk

Dear Mr Jones

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 – Regulation 10 and 11 Scoping Consultation Application Reference: EN0110033 – Arrow Valley Solar Limited – Arrow Valley Solar Response of Alcester Town Council

Thank you for your letter dated 30 March 2026 consulting Alcester Town Council in respect of the above application and the preparation of an Environmental Statement (ES) for the proposed Arrow Valley Solar development.

Alcester Town Council notes that the proposed development does not fall within the parish boundary of Alcester. However, the Council considers itself a relevant consultation body given the proximity of the proposed development to the town and the significant potential impacts on the wider landscape, heritage setting, and character of this part of Warwickshire. The Council is pleased to submit the following observations for the Planning Inspectorate's consideration when adopting the Scoping Opinion.

1. Landscape and Visual Impact

The Council considers that the ES must include a thorough Landscape and Visual Impact Assessment (LVIA) in order to protect, enhance and manage the quality and character of the local landscape and townscape. The proposed development lies in an area of recognised landscape sensitivity, and the Council notes that part of the application site falls within a designated Special Landscape Area (SLA). The Council strongly requests that the ES addresses the following:

- The specific impacts of the development upon the Special Landscape Area, including the cumulative effect on its character and the qualities for which it was designated.

- Visual impacts on the wider countryside setting as viewed from Alcester and surrounding settlements, including long-distance views and public rights of way (the Heart of England Forest, the Heart of England Way and Monarch's Way cover significant areas within the Alcester area).
- The impact on the proposed cycle way from Evesham to Alcester and Broom to Stratford being developed by the charity Two Shires Greenway <https://twoshiresgreenway.org.uk/> and how any impact might be mitigated.
- The effectiveness and adequacy of any proposed mitigation, including landscaping and screening, in relation to receptors within and adjacent to Alcester parish.

2. Green Belt

The Council notes that Green Belt land lies immediately to the north of the application site.

Alcester is a designated 'key inset area' within the (1975) West Midlands Green Belt – a statutory green belt environmental and planning policy that regulates the rural space within the West Midlands region.

The ES should carefully assess the relationship between the proposed development and the Green Belt boundary, including any direct or indirect impacts on the openness of the Green Belt and the purposes it serves. The Council requests that the ES demonstrate that there will be no encroachment, visual coalescence, or other adverse effect upon the Green Belt, either during construction, during the operational lifetime of the development, or during decommissioning

3. Heritage Assets and Cultural Heritage

The Council draws particular attention to the presence of Ragley Hall, a Grade II* Listed Building, in proximity to the proposed development. Ragley Hall is a heritage asset of considerable significance, and the ES must include a thorough assessment of the impact of the proposed development on its setting. The Council requests that the ES specifically address:

- The impact on the setting of Ragley Hall and its associated designed landscape, in accordance with Historic England's guidance on the Setting of Heritage Assets (GPA3).
- Views to and from Ragley Hall, including any intervisibility between the proposed development and the Hall or its parkland.
- Any other designated or undesignated heritage assets, including listed buildings, conservation areas, archaeological sites, and their settings. For example, Alcester is a scheduled Roman town, with a significant number of listed buildings. There is a large Conservation Area, the nearby hamlet of Oversley Green, the estate village of Arrow next to Ragley, Alcester Abbey, and Beauchamp Court (which is a scheduled monument). All of these need to be considered within the study area.

4. Traffic and Construction Impacts

The Council requests that the ES includes a full Transport Assessment addressing the likely construction traffic routing. Given the proximity of Alcester to the site, the Council is concerned about the potential use of roads through or adjacent to the town by heavy goods vehicles during the construction phase. The ES should identify proposed

construction traffic routes, assess their impact on highway safety and local amenity, and set out any mitigation measures proposed.

5. Ecology, Biodiversity and Geodiversity

The ES should include a comprehensive Ecological Impact Assessment covering habitats and species within and adjacent to the site. This should include an assessment of cumulative impacts on wildlife corridors linking the application site to Alcester parish and the surrounding countryside. The Council requests particular attention be given to Alcester's ancient woodland, veteran trees, hedgerows, watercourses, local wildlife sites, local nature reserves and any protected species known to use the area.

Alcester is located within a minerals safeguarding area. The Council requests that the ES includes an assessment of the potential impact on this minerals safeguarding area – identified as unconsolidated sand and gravel resources and areas of building stone.

6. Agricultural Land

The Council requests that the ES includes an assessment of the agricultural land quality within the application site and the impact of the proposed development on both the long-term loss of productive agricultural land, and quality of the soil for agricultural purposes once the development has been decommissioned (including the impact of the underground infrastructure remaining in situ). Any cumulative effects arising from the combination of this and other solar or renewable energy proposals in the wider area should also be addressed.

7. Flood Risk

A significant area of land affected by the proposed development would be at flood risk or adversely impacted. Alcester and the surrounding area has suffered significant flooding historically and a number of areas of the town lie in flood zones 2 & 3. The Council requests that the ES includes a strategic flood assessment to consider the cumulative impacts in local areas susceptible to being affected by flooding.

8. Socioeconomic and Community Impacts

The ES should assess any socioeconomic effects of the proposed development on the local community, including impacts on tourism, recreation, and the rural economy. Alcester is a market town that derives benefit from its rural and historic setting, and the Council requests that any impacts on the town's character and attractiveness as a visitor destination be adequately assessed.

9. Cumulative impact

The ES should assess the cumulative effect of this scheme together with other solar farm projects within the area both developed out and planned.

The Council reserves the right to make further representations as the application progresses and looks forward to being consulted at all future statutory stages of the process, including the applicant's own pre-application consultation.

Please do not hesitate to contact me if you require any further information.

Yours sincerely



Town Clerk

Rishabh Rai

From: Reception <Reception@anesco.co.uk>
Sent: 01 April 2026 07:58
To: Arrow Valley Solar
Subject: RE: EN0110033 Arrow Valley Solar EIA Notification

You don't often get email from reception@anesco.co.uk. [Learn why this is important](#)

Good Morning

There is no need for us to respond as it isn't one of our roof tops

Kind Regards

From: Arrow Valley Solar <ArrowValleySolar@planninginspectorate.gov.uk>
Sent: 30 March 2026 14:31
Subject: EN0110033 Arrow Valley Solar EIA Notification

You don't often get email from arrowvalleysolar@planninginspectorate.gov.uk. [Learn why this is important](#)

Dear Sir/Madam

Please see attached correspondence on the proposed Arrow Valley Solar Farm.

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **27 April 2026**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards,



Planning
Inspectorate

Rishabh Rai (He/Him)
Associate EIA Advisor
Planning Inspectorate

@PINSgov [Planning Inspectorate](#) [planninginspectorate.gov.uk](#)

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DPC:76616c646f72





Arrow Valley Solar Limited Development

Ref: ENO1 110033

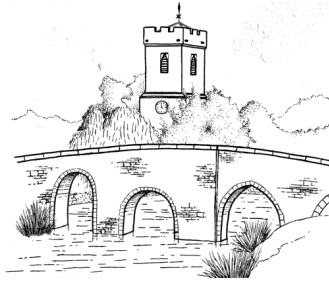
- The Government has stated that essential development will take place initially on public owned land. This is PRIVATE LAND.
- Public land is available on central reservations and sides of motorways. More expensive for the developer but should be considered before private, green belt and agricultural land.
- South Warwickshire and East Worcestershire are already under pressure for housing land and we are still awaiting on the decision of the SWLP so that we can assess the loss of farming land against the housing and energy demands on land.
- The Energy Minister, Farming Minister and Housing Minister need to come to an agreement on the pressure for food versus pressure for housing versus pressure for energy.
- If more houses mean the need for more energy both of which mean a depletion in availability of farmland so the availability for food becomes the most important of the three pressures.

Bill Baldwin

Chair

BIDFORD ON AVON PARISH COUNCIL

In the County of Warwickshire



Bidford-on-Avon Parish Council –

**Formal Response to PINS on the Arrow Valley Solar EIA Scoping Report
(EN0110033)**

Submitted to: The Planning Inspectorate (PINS)

From: Bidford on Avon Parish Council (BoAPC)

**Subject: Response to the Environmental Impact Assessment Scoping Report
(March 2026)**

Scheme: Arrow Valley Solar

1. Executive Summary

Bidford-on-Avon Parish Council (BoAPC) has reviewed the Arrow Valley Solar EIA Scoping Report (Volume 1) and submits this response to PINS under Regulation 10 of the EIA Regulations.

BoAPC concludes that the Scoping Report omits several critical environmental, social, landscape, agricultural, heritage, and community-impact considerations, and in multiple areas proposes to scope out topics that must legally and reasonably be scoped in.

The Scoping Report fails to:

- Adequately assess landscape and visual harm to Salford Priors, Dunnington, Wood Bevington, Broom, Wixford and the wider area.
- Address cumulative impacts with other solar schemes and grid infrastructure.

- Properly evaluate loss of Best and Most Versatile (BMV) agricultural land, contrary to NPPF and SDC Core Strategy.
- Assess public rights of way including the proposed leisure trails route between Salford Priors and Wixford, tranquillity, dark skies, and rural character.
- Consider community wellbeing, mental health, and residential amenity.
- Address heritage setting impacts, including non-designated assets.
- Provide adequate detail on glint and glare, traffic, construction disturbance, hydrology, flood risk, and ecological fragmentation.
- Reflect the policies of the Salford Seven Neighbourhood Development Plan, which is a statutory part of the Development Plan.

BoAPC therefore requests that PINS instruct the Applicant to significantly expand the scope of the Environmental Statement (ES) to include the matters set out in this submission.

2. Relevant Planning Policy Framework

2.1 National Planning Policy Framework (NPPF)

The following NPPF sections are directly engaged and must be fully assessed in the ES:

- Para 15–16: Plan-led system; NDPs form part of the Development Plan.
- Para 92: Healthy, safe, inclusive communities.
- Para 130: High-quality design, local character, sense of place.
- Para 152–158: Renewable energy must be balanced against environmental harm.
- Para 174–181: Protecting landscapes, soils, biodiversity, and habitats.
- Para 185: Noise, tranquillity, and amenity.
- Para 199–208: Heritage assets and their settings.
- Para 100: Public rights of way must be protected and enhanced.

The Scoping Report does not demonstrate compliance with these requirements.

2.2 Stratford-on-Avon District Council Core Strategy (SDC CS)

Relevant policies include:

- CS.5 – Landscape: Protect rural character, avoid industrialisation of countryside.
- CS.6 – Natural Environment: Protect habitats, species, ecological networks.
- CS.7 – Green Infrastructure: Avoid fragmentation.
- CS.8 – Historic Environment: Protect heritage settings.
- CS.15 – Distribution of Development: Protect rural settlements.
- CS.16 – Housing Development: Protect residential amenity.

- CS.26 – Transport and Movement: Protect rural roads and PRow.
- CS.27 – BMV Agricultural Land: Avoid loss of Grades 1–3a.

The Scoping Report fails to address CS.5, CS.7, CS.26, and CS.27 in particular.

2.3 Neighbourhood Development Plan (NDP)

The NDP is a statutory part of the Development Plan and must be given full weight.

Relevant policies include:

- ENV 1 – Renewable and Low Carbon energy
- ENV2 – Green infrastructure
- ENV3 – Blue infrastructure
- ENV4 – Reducing Flood risk
- ENV5 - Drainage
- ENV6 – Protection of the best and most valuable agricultural land
- ENV7 – Valued landscapes, skylines and views
- ENV8 – Designated Heritage Assets
- ENV9 – Promoting High Quality Design
- ENV10 – Nature conservation
- AM1 – Protecting and enhancing health opportunities
- AM3 – Community facilities
- AM4 – Local Green Spaces
- AM6 – Promoting walking & cycling
- ECON 5 Promoting riverside activities

The Scoping Report does not reference the NDP at all, which is a significant omission.

3. General Observations on the Scoping Report

BoaPC identifies the following overarching issues:

3.1 Excessive reliance on “embedded mitigation”

The Applicant repeatedly uses embedded mitigation as justification for scoping out topics. This is contrary to EIA principles, which require assessment of unmitigated effects first.

3.2 Underestimation of landscape and visual harm

The scheme covers 1,762 ha, making it one of the largest solar NSIPs in the UK. The Scoping Report does not reflect the true scale of industrialisation.

3.3 Insufficient baseline data

Many topics rely on desk-based assumptions rather than field surveys.

3.4 Failure to consider community impacts

The Scoping Report treats socio-economic and human health impacts as negligible, which is not evidence-based.

3.5 Inadequate cumulative assessment

The report does not include:

- Other solar schemes in Warwickshire/Worcestershire
- Grid reinforcement projects
- BESS-related risk assessments
- Transport cumulative impacts

4. Detailed Topic-by-Topic Response

Below is a structured analysis of what must be included and what is missing.

4.1 Landscape and Visual Impact (LVIA)

Must be scoped in more extensively.

Missing / inadequate:

- Assessment of views from Salford Priors, Dunnington, Abbots Salford, Iron Cross, Rushford, and Broom.
- Assessment of cumulative landscape industrialisation.
- Assessment of night-time lighting, contrary to NPPF para 185.
- Assessment of tranquillity and dark skies (Cotswolds National Landscape is intervisible).
- Full Zone of Theoretical Visibility (ZTV) modelling.
- Photomontages from all PRoW and key village viewpoints.

BoAPC is concerned that the baseline mapping used in the detailed plan may be out of date and may not show all existing and consented residential receptors. The Applicant should ensure that the EIA is based on accurate, up-to-date mapping and topographical information, and that all relevant receptors are included within the LVIA and amenity assessments, to ensure effects are properly identified and tested. Broom is a rural settlement with an open relationship to the River Arrow and surrounding farmland, and parts of the village are designated as a Conservation Area. The EIA should include a robust Landscape and Visual Impact Assessment (LVIA) to assess effects on landscape character, key views and the setting of the

Conservation Area. Given the relatively dark baseline night-time environment at the village edge, the EIA should also assess lighting impacts and set out a sensitive lighting strategy that avoids harm to amenity and ecological receptors.

Security measures (including fencing, CCTV and any security lighting) have potential to introduce engineered/industrial elements into an otherwise rural landscape and to affect both residential amenity and biodiversity (particularly bats and other nocturnal species). SPPC requests that the EIA assesses these effects and that the scheme includes a design-led approach to security (minimising fencing height and visual prominence where possible, using appropriate materials/colour, and limiting lighting through a dark-sky and ecology-sensitive strategy), consistent with the NPPF and relevant Stratford-on-Avon DC Core Strategy policies on landscape character, amenity and the natural environment.

Required by policy:

- NPPF 174, 185
- SDC CS.5
- NDP ENV7 and ENV8

4.2 Agricultural Land and Soils (BMV Land)

The Scoping Report acknowledges BMV land but underplays the significance.

Missing / inadequate:

- Quantification of total hectares of Grades 1, 2, and 3a to be lost.
- Assessment of long-term soil degradation under solar arrays.
- Assessment of food security impacts, contrary to NPPF 174(b).
- Assessment of agricultural displacement and rural economy impacts.

Soils and agricultural land classification

The proposals encompass land identified as Agricultural Land Classification (ALC) Grades 2 and 3. BoAPC requests that the Applicant provides an up-to-date, site-specific ALC assessment (where not already robustly evidenced) and demonstrates how the scheme has minimised the use of best and most versatile agricultural land, in line with the NPPF and relevant Stratford-on-Avon DC Core Strategy policies. The EIA should also address soil handling and restoration (including for cable trenches and compounds) through an outline Soil Management Plan.

Required by policy:

- NPPF 174(b)
- SDC CS.27
- NDP ENV6

4.3 Public Rights of Way (PRoW)

The Scoping Report fails to recognise the density and importance of PRoW around Dunnington, Salford Priors, Broom and Bidford-on-Avon

Missing / inadequate:

- Full PRoW amenity assessment.
- Visual enclosure impacts.
- Loss of rural character and tranquillity.
- Construction-phase diversions and severance.
- Compliance with NPPF para 100.

Required by policy:

- NPPF 100
- SDC CS.26
- NDP AM6

4.4 Ecology and Biodiversity

Although ecology is scoped in, the approach is insufficient.

Missing / inadequate:

- Assessment of raptors (buzzards, red kites, kestrels, owls).
- Assessment of habitat fragmentation across 1,762 ha.
- Assessment of hedgerow loss and severance.
- Assessment of invertebrate decline due to shading.
- Assessment of BESS fire risk to ecology.
- Assessment of BESS fire risk to ecology.

Additional ecology matters that must be scoped in:

SSSI (Broom SSSI)

The Scoping Report appears to understate the sensitivity of the Broom SSSI. The proposed cable corridor would run adjacent to the designated site, and construction activity (excavation, plant, construction traffic, dust deposition and temporary access) has potential to result in indirect effects on the SSSI and its qualifying features. SPPC requests that the EIA scope explicitly considers the potential for likely significant effects on the SSSI (direct and indirect) and that Warwickshire County Council Ecology and/or Natural England are consulted on the appropriate survey requirements, avoidance measures, construction environmental management controls (CEMP), and any necessary mitigation/monitoring, in accordance with the NPPF's approach to conserving and enhancing biodiversity and Stratford-on-Avon DC Core Strategy policies on the natural environment.

Otter presence (River Arrow)

The River Arrow is known to support otter (*a European Protected Species*). BoAPC considers that a single survey visit is unlikely to provide a robust baseline for a linear river corridor subject to seasonal variation. The EIA should include proportionate, repeat survey effort (including for holts, couches, commuting and foraging evidence) across all sections of the river corridor potentially affected by works (including cable installation and any crossings), and should identify avoidance buffers, timing constraints and mitigation, consistent with the NPPF and Stratford-on-Avon DC Core Strategy policies on biodiversity.

River crossings and river-adjacent panel layout

Where cable routes and associated works are proposed to cross the Rivers Arrow and Avon, BoAPC expects the EIA to be informed by appropriate baseline ecological surveys for the full corridor of works and all relevant receptors, rather than relying on an assumption of absence. The assessment should identify constraints, apply the mitigation hierarchy (*avoid, mitigate, compensate*), and demonstrate policy compliance with national and local objectives to conserve and enhance biodiversity. This should include, but not be limited to, amphibians including great crested newt where relevant. Given the presence of ponds within and close to the proposed order limits, the EIA scope should confirm the need for Habitat Suitability Index assessment and, if indicated, further presence/absence and population surveys, together with a robust impact assessment and any licensing/mitigation pathway.

The River Arrow corridor supports a range of species (including waterfowl, fish and invertebrates) indicative of a functioning riparian ecosystem. BoAPC considers that the baseline described in the Scoping Report may not adequately reflect current ecological value and sensitivity. The EIA should therefore provide an up-to-date, evidence-based baseline (including aquatic and riparian habitats) and assess potential effects from panel layout adjacent to the river, construction activity, and changes to runoff pathways (including during flood events), with appropriate mitigation and monitoring.

Any proposed river crossings (including stilted structures) have potential to disturb bankside vegetation and riparian habitat, with consequent effects on otter and other species. The EIA should therefore include a clear assessment of construction methodology for crossings, temporary works and access, bank reinstatement proposals, and any necessary buffers and habitat protection measures.

Bats

Local records indicate notable bat activity in the area, particularly along the River Arrow corridor and associated hedgerows/treelines which function as commuting and foraging routes. BoAPC requests that the EIA includes proportionate bat survey effort (including activity surveys and assessment of key linear features) and considers emerging evidence on potential effects of solar developments on bats and insect prey availability. The assessment should set out avoidance and mitigation (e.g., retention and strengthening of dark corridors, sensitive lighting design, and habitat enhancements) and demonstrate how biodiversity net gain objectives will be achieved in line with national policy and Stratford-on-Avon DC Core Strategy

requirements.

Habitat loss, fragmentation and ecological networks

While panel areas may be set back from some field boundaries, the overall scale and dispersed nature of the proposals implies a substantial construction footprint associated with cable corridors, trenching, joint bays, access and temporary compounds. The EIA should therefore assess habitat loss, fragmentation and disturbance arising from both the generating sites and the interconnection works, including impacts on hedgerows, treelines, field margins and watercourse buffers. The Scoping Report should confirm that survey coverage extends beyond panel fields to all associated works and that mitigation follows the established hierarchy. Given the importance of hedgerows and treelines as ecological networks (including for bats), BoAPC requests that the Applicant provides accurate mapping and baseline information for all existing linear features, and that landscape/ecology assessments are informed by current topographical and habitat data. This should include clear identification of any features to be removed, gapped-up or strengthened, and how ecological connectivity will be maintained or enhanced.

Ground conditions and piling methodology (relevant to ecology/amenity)

Local ground conditions include sand and marl. Ground-mounted solar typically requires driven piles or other foundations, and the Scoping Report references piling depths of up to 4 metres. BoAPC requests that the EIA scope includes proportionate site-specific geotechnical investigation to inform foundation design and to assess potential construction effects (including noise, vibration and ground-borne disturbance) on nearby receptors and sensitive structures (including bridges). The assessment should also consider how ground conditions may influence construction duration, construction traffic movements, and the adequacy of proposed construction management measures, consistent with national policy on protecting residential amenity and ensuring safe and suitable development.

Required by policy:

- NPPF 174(d), 180(a)
- SDC CS.6, CS.7
- NDP ENV2 & ENV10

4.5 Heritage and Archaeology

The Scoping Report underestimates setting impacts.

Archaeology

The area has a well-established archaeological resource, including evidence from prehistoric, Roman and Anglo-Saxon periods, and historic assets associated with the River Arrow and River Avon corridors.

The statement sets out key omissions within the applicant's scoping report in relation to the historic environment, specifically concerning the areas of Wood

Bevington and Dunnington. These areas are of recognised historical importance, having associations with significant national events, including the Battle of Evesham (1265) and activity during the English Civil War. As such, the scoping report fails to adequately address the potential impacts of the proposed development on heritage assets and their settings.

Given the scale of ground disturbance associated with panel foundations, battery infrastructure and extensive underground cabling, the EIA should include a robust cultural heritage assessment. BoAPC considers that this should not rely solely on desk-based assessment, but should include an appropriate programme of non-intrusive and, where necessary, intrusive evaluation (e.g., geophysics and trial trenching) to inform layout, micro-siting and mitigation, in line with the NPPF's heritage policies and relevant Stratford-on-Avon DC Core Strategy policies.

BoAPC requests early engagement with Warwickshire County Council's Archaeology/Heritage service and other relevant specialists to agree the scope of evaluation and mitigation, and to ensure that the assessment is proportionate, evidence-led and capable of informing the Examination.

Missing / inadequate:

- Assessment of non-designated heritage assets in Bidford-on-Avon parish.
- Assessment of historic landscape character.
- Assessment of views to/from heritage assets.
- Assessment of cumulative harm.

Required by policy:

- NPPF 199–208
- SDC CS.8
- NDP ENV8

4.6 Population, Human Health, and Residential Amenity

The Scoping Report proposes to scope out socio-economics, which is unacceptable.

Missing / inadequate:

- Assessment of mental health impacts from loss of landscape, tranquillity, and rural identity.
- Assessment of construction disturbance (noise, dust, HGVs).
- Assessment of long-term visual oppression for residents.
- Assessment of community cohesion impacts.
- Assessment of loss of recreational amenity.

BoAPC notes that some residential receptors (a dwelling currently under construction at the former Broom Junction site) do not appear to be shown on the detailed plan. The Applicant should ensure that all sensitive receptors are accurately

identified and included within the EIA study area. Given the proximity of panels and associated equipment to the river boundary and nearby dwellings, the EIA should assess construction and operational noise (including inverters/transformers) and vibration effects on residential amenity, and should identify appropriate stand-off distances, screening and controls where necessary, consistent with the NPPF and relevant Core Strategy policies.

Noise assessment should be based on representative baseline monitoring and should take account of local topography and the open character of the village in relation to the site. The EIA should consider both construction and operational phases (including maintenance activity), and assess cumulative effects where relevant, with clear mitigation and compliance criteria.

If driven piling is proposed, there is potential for significant temporary noise and vibration effects. The EIA should therefore set out the likely foundation methodology, programme and working hours; assess impacts against relevant standards; and identify mitigation (including alternative foundation methods where appropriate, buffer distances, and monitoring/complaints procedures) to protect residential amenity.

Required by policy:

- NPPF 92, 130, 185
- SDC CS.16
- NDP AM1, AM3 & AM4

4.7 Transport and Access

The Scoping Report underestimates the scale of HGV movements.

Missing / inadequate:

- Full construction traffic modelling.
- Assessment of rural lane suitability.
- Assessment of cumulative traffic with other NSIPs.
- Assessment of NMU safety.
- Assessment of PRow crossings.

The scale of the proposals implies extensive trenching for cabling and associated construction activity, including the movement and storage/disposal of excavated material and imported backfill. The EIA should include a detailed Construction Traffic Management Plan (CTMP) proportionate to the dispersed nature of the works, addressing HGV numbers, abnormal loads, routing, hours of operation, construction compounds, and measures to protect the local highway network.

There are narrow or no footways and on-road parking, with a number of properties fronting directly onto the highway. BoAPC considers that construction routing through the settlements could give rise to highway safety risks and unacceptable amenity impacts. The CTMP should therefore demonstrate how HGV routing will

avoid unsuitable roads and settlements where practicable, and how residual impacts will be managed.

BoAPC requests clarity on the structural capacity and any weight/width restrictions affecting Broom Bridge, and whether it is suitable for construction traffic associated with this project. Pending robust evidence (including any necessary structural assessment and agreement with the Highway Authority), SPPC considers that Broom Bridge should not be relied upon as a construction traffic route.

Construction traffic should avoid constrained crossings and sensitive historic structures where practicable, including Bidford's narrow historic bridge, unless a robust assessment demonstrates suitability and appropriate controls are secured. The CTMP should set out agreed routes and mitigation to prevent damage to highway infrastructure and heritage assets.

Given the rural road network, watercourses and multiple small bridge crossings in the wider area, BoAPC requests that the transport assessment and the CTMP consider the impacts across a sufficiently wide study area. This should include route appraisal, swept-path analysis where relevant, bridge capacity constraints, and pre and post-construction road/structure condition surveys and reinstatement arrangements.

Required by policy:

- SDC CS.26
- NDP SP14

4.8 Hydrology, Flood Risk, and Water Environment

The Scoping Report proposes to scope out several water-related impacts.

Missing / inadequate:

- Assessment of runoff from panel surfaces.
- Assessment of soil compaction and reduced infiltration.
- Assessment of flood risk to downstream villages.
- Assessment of BESS contamination risk.
- Up to date EA Flood Map of broom that takes into account the FAS built at Millers Bank

Flood risk and water environment – further points to scope in

The Scoping Report indicates that a detailed Flood Risk Assessment (FRA) for the River Arrow may not be required because the area is already identified as being at flood risk. SPPC considers that the EIA should nevertheless assess the scheme's potential to alter floodplain function and surface water pathways (including during construction), and the implications for the water environment. This should include an up-to-date FRA and supporting drainage strategy proportionate to the scale and

linear extent of the proposals, taking account of existing flood defences and any observed changes in flood behaviour locally.

Local evidence suggests that flood behaviour in the vicinity has been influenced by existing flood defences, with potential redistribution of floodwater to adjacent land. The baseline used for the EIA should therefore be updated to reflect current conditions, and the assessment should consider any risk of increasing flood depth, velocity or duration elsewhere (including downstream effects), in line with national policy requirements for managing flood risk.

The EIA should assess potential impacts on water quality arising from construction and operational phases, including mobilised sediments, contaminated runoff, debris and pollution incidents, and the consequent effects on protected and notable species associated with the River Arrow.

BoAPC considers that a clear pollution prevention approach and construction controls should be secured through a CEMP and a Water Framework Directive-informed assessment where relevant.

Required by policy:

- NPPF 159-169
- SDC CS.6

4.9 Glint and Glare

The Scoping Report includes glint and glare but lacks detail.

Missing / inadequate:

- Assessment of impacts on:
 - Residential properties
 - Road users
 - PRow users
 - Aircraft and emergency services
- Assessment of cumulative glare across 1,762 ha.

The reflective characteristics of solar arrays can give rise to glint and glare effects. BoAPC requests that the EIA includes a formal glint and glare assessment covering likely sensitive receptors, including nearby residential properties, road users and aviation interests (including any relevant local airfield operations). The assessment should identify worst-case scenarios, demonstrate compliance with relevant guidance, and set out mitigation (including layout/micrositing, screening and surface specifications) where effects could be significant.

4.10 Major Accidents and Disasters (BESS Fire Risk)

The Scoping Report proposes to scope out major accidents and disasters.

This is not acceptable.

Missing / inadequate:

- Thermal runaway modelling.
- Toxic plume dispersion modelling.
- Fire service access and water supply assessment.
- Assessment of explosion risk.
- Assessment of community evacuation scenarios.

Required by policy:

- NPS EN-1 (safety)
- NPPF 97

5. Cumulative Effects

The Scoping Report's cumulative assessment is inadequate.

Missing / inadequate:

- Other solar farms in Warwickshire/Worcestershire.
- Grid reinforcement projects.
- Battery storage schemes.
- Transport cumulative impacts.
- Landscape cumulative industrialisation.

6. Conclusions and Requests to PINS

Bidford-on-Avon Parish Council respectfully requests that PINS instruct the Applicant to:

1. Expand the scope of the ES to include:

- Full LVIA including all villages and PRow.
- Full agricultural land assessment including BMV quantification.
- Full PRow amenity and tranquillity assessment.
- Full human health and wellbeing assessment.
- Full heritage setting assessment.
- Full hydrology and flood risk modelling.
- Full glint and glare modelling.
- Full BESS fire and explosion risk assessment.
- Full cumulative impact assessment.

2. Require explicit assessment against:

- NPPF
- SDC Core Strategy
- Bidford-on-Avon NDP
- NPS EN-1, EN-3, EN-5

3. Require additional baseline surveys

Including ecology, landscape, heritage, traffic, hydrology, and soil surveys.

4. Require meaningful community engagement

Given the scale of local impact.

7. Final Statement

The Arrow Valley Solar NSIP is of unprecedented scale for this rural area. The Scoping Report, as submitted, does not provide a sufficiently robust foundation for an Environmental Statement that meets statutory requirements or reflects the realities of local impact.

BoAPC therefore urges PINS to require a substantially expanded scope to ensure that the environmental, social, landscape, agricultural, and community impacts are fully and transparently assessed.

Official response made by

Bidford on Avon Parish Council

26th April 2026

Place and Regeneration

David Peckford, Assistant Director – Planning



Cherwell

DISTRICT COUNCIL
NORTH OXFORDSHIRE

Planning Inspectorate
Environmental Services
Infrastructure Decisions and Applications Service
Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough
SL1 4PN

Cherwell District Council
39 Castle Quay
Banbury
OX16 5FD
www.cherwell.gov.uk

Please ask for: [REDACTED]

Direct Dial: [REDACTED]

Email: [REDACTED] herwell-dc.gov.uk

Your Ref: **EN0110033**

2nd April 2026

Dear Sir/ Madam

TOWN AND COUNTRY PLANNING ACT 1990

Application No.: 26/00817/MISC

Applicant's Name: C/O Agent

Proposal: Application by Arrow Valley Solar Limited (the applicant) for an Order granting Development Consent for the Arrow Valley Solar (the proposed development) - Scoping consultation

Location: *Various locations in Warwickshire*
North of Cherwell District

Parish(es):

Having regard to the application site, the form of the development and the distance to the Cherwell District, we would confirm that we wish to make no comments on the information to be included within the Environmental Statement.

Yours faithfully

[REDACTED]

Rishabh Rai

From: [REDACTED]@cotswold.gov.uk>
Sent: 07 April 2026 16:06
To: Arrow Valley Solar
Subject: RE: EN0110033 Arrow Valley Solar EIA Notification

You don't often get email from [REDACTED]@cotswold.gov.uk. [Learn why this is important](#)

Good afternoon,

I write in regard to the above Scoping Opinion consultation. Thank you for sending the consultation.

Cotswold District Council do not have any comments to make in relation to this at the current time.

Kind regards

[REDACTED]

[REDACTED]
Senior Planning Officer



COTSWOLD
District Council

The content of this email and any related emails do not constitute a legally binding agreement and we do not accept service of court proceedings or any other formal notices by email unless specifically agreed by us in writing.

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Our ref:

Service:

Direct Line:

Date:

Arrow Valley Solar Farm Planning Services

24th April 2026

Planning Inspectorate

ArrowValleySolar@planninginspectorate.gov.uk.

BY EMAIL ONLY

Dear Sir/ Madam,

Re: Arrow Valley Solar – Dudley MBC response

Thank you for consulting Dudley Metropolitan Borough Council on the Application by Arrow Valley Solar Limited (Ref: EN0110033). We have received correspondence in respect of an email dated 30th March 2026 titled 'Arrow Valley Solar'.

Having reviewed the submitted information and the location of the proposed development, the Council notes that the site is located a considerable distance from Dudley MBC's boundary. It is not considered that the proposed development would give rise to any likely significant environmental effects within the Borough.

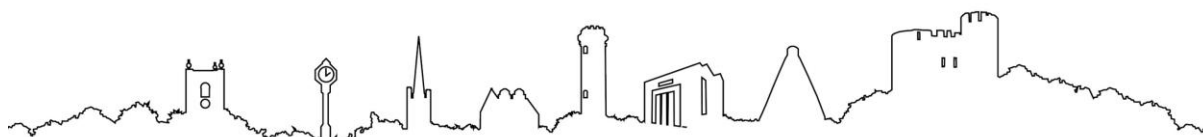
On this basis, the Council has no specific matters it wishes to raise for inclusion within the scope of the Environmental Statement, and no further comments to make at this stage.

Thank you for the opportunity to comment. If you require any clarification or further discussions on our response, please contact [REDACTED] (Planning Policy Manager) via planning.policy@dudley.gov.uk.

Yours sincerely

[REDACTED]

Planning Policy Service Unit
Growth and Infrastructure – Economy and Place
Dudley Council



Planning Inspectorate
[ArrowValleySolar@planninginspectorate.gov.uk]

Reference: OR-0001167/01
Customer reference: EN0110033

24 April 2026

Dear Sir/Madam

EIA SCOPING CONSULTATION FOR THE ARROW VALLEY SOLAR PROJECT

Thank you for your consultation on the Scoping Report, submitted under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, in support of the Application by Arrow Valley Solar Limited (the Applicant) for an Order granting Development Consent (DCO) for the Arrow Valley Solar. This consultation was received on 30 March 2026.

We have reviewed the Main Report and accompanying figures, and can provide the following advice in relation to matters within our remit.

We must take issue with the scope of the Environmental Impact Assessment (EIA) as currently defined and would recommend further issues are scoped in to meet the requirements of the EIA regulations.

Further detailed comments are provided within the following appendices:

- Appendix A – Comments on the scope of the EIA
- Appendix B – General advice on the proposals and EIA content
- Appendix C – Additional advice for the Applicant

Please note this response does not represent our final view in relation to any future DCO, or any environmental permit applications made to us. Our final views will be based on all relevant information including applications and guidance available at the time of submission.

We trust this advice is useful.

Yours faithfully,


Planning Specialist – National Infrastructure Team

Email: Nlteam@environment-agency.gov.uk

Appendix A – Comments on the scope of the EIA

Fish

Document Reference(s): EIA Scoping Report, Volume I Main Report, Table 6-2	
Issue	The significance of the proposals on fish has not been suitably addressed. Fish have been scoped out for all three phases of development, on the basis that necessary mitigation will be secured through the outline Construction Environmental Management Plan (CEMP), outline Operational Environmental Management Plan (OEMP) and outline Decommissioning Environmental Management Plan (DEMP).
Impact	Risk of mitigation being unsuitable and impacts may still persist. We would argue that it is not possible to fully assess impact-pathways to fish receptors in order to design mitigation, without a thorough understanding of the fish baseline on site.
Solution	To inform mitigation and to conclude whether there will be an impact to fish species, we consider that fish presence/absence surveys should be conducted on waterbodies with the site where suitable fish habitat is present.

Document Reference(s): EIA Scoping Report, Volume I Main Report, Section 5.8	
Issue	Impacts to fish from Electromagnetic Fields (EMFs) have been omitted from the EIA.
Impact	Risk of behavioural impacts to fish where high voltage (HV) cables (>132kV) are laid beneath watercourses. There is also evidence that EMFs can impact on fish egg and larval development.
Solution	Include within the EIA an assessment of impacts on fish species from EMFs where HV cables >132kV are passing underneath main watercourses.

Document Reference(s): EIA Scoping Report, Volume I Main Report, Table 6-1	
Issue	Omission of the Severn Estuary Special Area of Conservation (SAC) and Severn Estuary Ramsar site from the scope of the EIA.
Impact	Risk of failing to assess potential impact-pathways that could affect lamprey, brown/sea trout and European eel, and thus the objectives of the Severn Estuary SAC and Ramsar. The Warwickshire Avon provides functionally linked habitat for said species.
Solution	Scope in the Severn Estuary SAC and Severn Estuary Ramsar and the following associated fish species: river lamprey, sea lamprey, brown/sea trout and European eel.
Additional narrative/explanation	
Impact-pathways include (but are not limited to):	
<ul style="list-style-type: none"> • Impacts on fish from EMFs where HV cables pass below watercourses; • Impacts from noise and vibration associated with construction; • Impacts from pollution and increased sedimentation; and, • Impacts from open-cut crossing of watercourses and potential loss or damage to habitat. 	

Document Reference(s): EIA Scoping Report, Volume I Main Report, Section 6.5.4	
Issue	Omission of mitigation for fish as a result of new temporary and permanent watercourse crossings.

Impact	Risk of impacts to fish including habitat fragmentation, loss of habitat, desiccation of habitat and increased suspended sediment from run-off.
Solution	Include fish in the scope of the EIA and baseline in order to inform the design and any necessary mitigation measures.

Water Resources

Document Reference(s): EIA Scoping Report, Volume I Main Report, Section 5.7

Issue	The Water Environment is proposed to be scoped out of the EIA, and as a result potential water supply demands have not been adequately evaluated. Consumptive uses of water that may be required by the Proposed Development could include (but may not be limited to): potable/domestic supply to welfare stations; dust suppression; wheel washing; and drilling fluids associated with horizontal directional drilling (HDD).
Impact	Risk of inadequately assessing the water demands of the Project and the residual impacts.
Solution	Commit to producing a water supply strategy which provides an options appraisal of sources of supply available to meet consumptive uses of water such as those identified above. This could be part of the Water Environment Environmental Statement (ES) chapter, or it could be a standalone document. This strategy should be undertaken based on engagement with the water companies and review of the abstraction licensing strategy for the area.

Additional narrative/explanation

Mains connections may be impractical in remote areas. Tankering water will add to HGV numbers on local roads. Limited groundwater is closed to new abstraction or subject to surface water status for which, a licence would be constrained by low flow restrictions.

The Environment Agency accepts that volumes are likely to be low and that water demands are likely to be short term during construction. However, we seek that confidence that there is a sustainable and practical source of supply available to the Project and that the Applicant has demonstrated an awareness of the potential limitations and restrictions that may cause problems pre-commencement.

We accept that details of exact volumes required for consumptive and non-consumptive water requirements will not be known until detail design and contractor input. These can be estimated however for the purposes of options appraising sources of supply available to the Project.

Document Reference(s): EIA Scoping Report, Volume I Main Report, Sections 5.7.13 and 5.7.14

Issue	Surface water abstractions and discharges within the study area have been identified, but the impacts of the Proposed Development on these have been scoped out of the EIA.
Impact	Risk of not adequately assessing impacts to these receptors, which could lead to their derogation. Risks may include pollution, impoundments and abstraction impacts (e.g. from a dewatering activity).
Solution	Scope in impacts upon lawful water users into the EIA and evaluate the effects accordingly.

Additional narrative/explanation

Licence data can be obtained from the Environment Agency and Local Authorities hold information on private water supplies which fall outside of regulation.

Geomorphology

Document Reference(s): EIA Scoping Report, Volume I Main Report, Section 10.7.1 and Table 5-14

Issue	Effects on watercourses have been scoped out for all stages of the Proposed Development due to provision of a CEMP and other mitigation measures, which are not yet specified, and despite the possibility of requiring new watercourse crossings to be constructed. This is also despite the Piddle Brook, a Water Framework Directive (WFD) waterbody which runs through one of the solar array areas, being a calcareous watercourse.
Impact	Risk of the Proposed Development leading to negative impacts on watercourses and associated habitats and a reduction in status of WFD classified waterbodies as a result of scoping out the Water Environment.
Solution	Scope the Water Environment into the EIA. Undertake a proper assessment of activities including whether new watercourse crossings for access routes are necessary, or whether existing crossing can be utilised and upgraded to benefit the water environment. Consider conducting River Condition Assessments in addition to the proposed modular river physical (MoRPH) surveys assessments to properly characterise the status of river habitats and morphology.

Additional narrative/explanation

We are pleased to see that there is an intention of implementing a 10m buffer to prevent encroachment and encourage the development of a riparian corridor. However, if watercourses are not properly considered at this stage (by being scoped out) then potential opportunities for Biodiversity Net Gain (BNG) uplift and enhancement of WFD status may be missed.

Groundwater & Contaminated Land

Document Reference(s): EIA Scoping Report, Volume I Main Report, Sections 5.7.55 and 5.7.68, Table 5-14

Issue	Effects on groundwater have been scoped out for all phases of the Proposed Development without sufficient consideration of potential impacts. Justifications are not currently sufficient.
Impact	Potential risks to groundwater if risks not adequately assessed.
Solution	Consider scoping in groundwater for all phases of the Proposed Development or provide more robust justification and proposed mitigation for its omission.

Additional narrative/explanation

The justification for scoping out the Water Environment includes insufficient detail regarding:

- Battery Energy Storage System (BESS) operation, drainage, fire risk, and firewater management
- Substation drainage, fire risk and firewater management
- Piled foundations for BESS and substations
- Sensitivity of groundwater receptors at the site
- Risks of using HDD in relation to groundwater
- Anticipated groundwater levels across the sites

Further work is needed. We are not satisfied the Applicant sufficiently understands the geological and hydrogeological setting of the site to justify scoping it out of further assessment, coupled with the fact that the location of the BESS, substations and buried cable route has not been defined.

Some of the proposed further works and mitigation are likely to be sufficient, but they do not cover all aspects of the proposed development. Higher risk elements, such as the BESS, have not been adequately considered.

Table 5-14 states that groundwater has been scoped out and gives a reason for this being that no works will occur within 3 m of an aquifer and an HDD breakout plan will ensure the HDD cable route will not cause significant impacts to groundwater. It is not clear how the Applicant proposes to restrict work within 3m of an aquifer. It is not clear whether this is 3m at surface or at depth (i.e. the water table). Groundwater levels at the site are not known so this will be difficult to manage.

There are numerous references throughout the report which acknowledge impacts on groundwater (and surface water) from firewater runoff in the event of a BESS fire and contaminants leaching out of damaged solar panels and batteries. It is not clear how a battery fire, a reasonable worst case scenario, is considered a passive and non-polluting activity (as mentioned in Section 5.7.68). No details have been provided as to how drainage will be managed at the BESS and substation, which makes it difficult to agree to scoping out groundwater from further assessment at this stage.

Document Reference(s): EIA Scoping Report, Volume I Main Report, Sections 5.7.33, 5.7.54 and 7.7.2, Table 5-14

Issue	The impacts of dewatering for construction purposes have been scoped out of further assessment, despite Section 5.7.54 stating that existing abstractions may be affected by dewatering activities during construction. The potential need for an abstraction licence for dewatering is also not mentioned.
Impact	Risk of impacting existing abstractions if dewatering occurs without ensuring the appropriate licences and mitigation measures are in place.
Solution	Consider groundwater levels and receptors across the entire scheme and ensure any permitting requirements are fully understood prior to commencement of works.

Additional narrative/explanation

It is unclear what is meant in Section 5.7.33 where it is stated that “the dataset presented includes only current licences/permits. Duplicates and revoked licences/permits are excluded on the assumption that they are no longer relevant/active”. We agree that revoked licences can be excluded if they are part of the dataset, a licence may have multiple points of abstraction or multiple purposes however which should not be mistaken for duplicates.

Current licence data can be obtained from the Environment Agency and Local Authorities hold information on private water supplies which fall outside of regulation.

Section 5.7.33 suggests that private water supply information will be collated to form part of the assessment at the ES stage. This is confusing as it sits within the chapter labelled 'topics to be scoped out'. Without a full picture of the receptors that could be affected by the scheme it is not possible to justify scoping out the impacts of dewatering at this stage.

Section 7.7.2 states that the baseline information and assessment presented in this chapter for the cable route corridor (CRC) Search Area is based on freely available information only. Site specific datasets from Groundsure have not been procured for this stage of the assessment whilst the CRC is still at an early stage of refinement.

Whilst it is acknowledged that Section 7.7.2 relates to the Ground Conditions and Contamination chapter, it is assumed that the Groundsure datasets that will be obtained for the CRC will contain information about controlled water receptors that will be relevant to the Water Environment assessment.

Document Reference(s): EIA Scoping Report, Volume I Main Report, Sections 5.7 and 7	
Issue	Section 7 (Ground Conditions and Contamination) is incomplete. Aquifer status and consideration of risks to controlled waters from existing or new contamination are missing from this section, and groundwater and aquifers are missing from the list of receptors.
Impact	Risk of impacts to controlled water receptors being missed.
Solution	Ensure risks to controlled waters and all receptors are adequately assessed in the Ground Conditions and Contamination section/ES chapter.
Additional narrative/explanation	
The Environment Agency's Land Contamination Risk Management (LCRM) Guidance should be followed.	
Only human health impacts have been scoped in for Ground Conditions and Contamination, despite not having obtained any site-specific datasets for the CRC. It is too early in the process to disregard controlled water receptors.	

Water Quality

Document Reference(s): EIA Scoping Report, Volume I Main Report, Sections 5.3.11, 5.7.61, 5.7.62, 5.7.65 and 7.6.5, Tables 5-6, 5-7 and 5-14	
Issue	The water quality risks from a BESS fire are currently not proposed to be scoped in as the Applicant has suggested that they do not need a Water Environment chapter of the ES.
Impact	Risk of the Proposed Development causing a deterioration in water quality if the firewater and other chemicals from the BESS are allowed to pose an unacceptable risk to water environment receptors by not being contained and removed sufficiently.
Solution	Scope the Water Environment into the EIA and specifically scope in the risk from firewater and other chemicals associated with the BESS.
Additional narrative/explanation	
Table 5-6 states that the outline Battery Safety Management Plan (BSMP) "will ensure that safety is considered during the design stage", but there is no recognition of water quality protections. Section 5.7.65 correctly states that there is the potential for impacts on groundwater and surface water from firewater runoff in the event of a BESS fire, but the impact has not been scoped in.	
Section 5.7.61 discusses surface water impacts during the operational phase, but fails to identify a water quality impact from firewater from the BESS, or spills from batteries leaking. Section 7.6.5 identifies firewater and spillage from batteries as a risk to groundwater, but	

fails to mention the risks to surface water. The risk from fire is not mentioned in Table 5-14, so it is an unaccounted for risk.

Table 5-7 discusses the potential impact of "electrical fires and explosions", but it has no recognition of water quality implications.

Section 5.7.62 lists the mitigation measures for operational impacts, but the outline BSMP has been omitted. This implies that the outline BSMP does not have a role to play in managing water quality, which is incorrect.

Any measures detailed in the outline BSMP to mitigate any potential impacts have not yet been seen, there we lack confidence that certain risks of deteriorating the water quality of the water environment will be sufficiently mitigated against.

Whilst we recognise in Section 5.3.11 that the National Fire Chiefs Council (NFCC) has produced a guidance document for grid scale BESS, and that this can help to lower the likelihood of a fire, it does not reduce the impact if a BESS fire should occur.

Document Reference(s): EIA Scoping Report, Volume I Main Report, Sections 5.7.49, 5.7.54 and 5.7.55, Table 5-14

Issue	Drilling fluid breakout is not recognised as a risk to surface water quality in Section 5.7.49 or Table 5-14.
Impact	Risk of surface water quality being reduced as a result of drilling fluid breakout.
Solution	Scope the Water Environment into the EIA and specifically scope in the risk that drilling fluids pose to surface waters, in addition to groundwater.

Additional narrative/explanation

Sections 5.7.54 and 5.7.55 identify drilling fluids as posing a risk to groundwater, but the risk to surface water is not identified.

Any measures detailed in the outline CEMP to mitigate any potential impacts have not yet been seen, therefore we lack confidence that certain risks of deteriorating the water quality of the water environment will be sufficiently mitigated against.

Document Reference(s): EIA Scoping Report, Volume I Main Report, Sections 5.7.49, 7.6.2, 7.6.5 and 5.7.61

Issue	The proposed scope of the EIA does not include risks posed by concrete to the Water Environment during the construction phase.
Impact	Risk of surface water quality being reduced as a result of hazardous substances during construction entering surface runoff. Concrete is a known source of hazardous substances, particularly during the curing phase.
Solution	Scope the Water Environment into the EIA and specifically scope in the risk that construction activities (including the use of concrete) pose to surface waters, in addition to groundwater.

Additional narrative/explanation

Many infrastructure features will be on concrete foundations, therefore the risk from concrete during construction must be scoped in. Concrete risk is not recognised as a risk to water quality in Section 5.7.49.

Section 5.7.61 says that there could be impacts on water quality due to spills during operation, however this risk is not scoped in, and spills could also happen during construction.

Sections 7.6.2 and 7.6.5 recognises a risk from mobilising of contaminants, stockpiling materials and heavy metals from panels for groundwater, however these are a risk to surface waters too and should be scoped in.

Document Reference(s): EIA Scoping Report, Volume I Main Report, Sections 4.4.5 and 5.7.49, Table 5-14

Issue	Table 5-14 which summarises scoping decisions fails to recognise the potential effect of foul water on surface water quality during all phases of the Proposed Development. As the Water Environment has been proposed to be scoped out, as have foul water impacts.
Impact	Risk of increasing the nutrient level of and contaminating the receiving water environment if foul waste is not managed correctly. Any foul waste generated will need to be contained, and then either connected to a sewer, tankered away, or treated and discharged under permit.
Solution	Scope the Water Environment into the EIA and specifically scope in the risk that foul water poses to surface waters. A foul water disposal strategy should be provided.

Additional narrative/explanation

Section 4.4.5 states that portacabins will be used during construction, but the foul water strategy for all phases of the Proposed Development is unclear. Foul water impacts are not recognised as a risk to water quality in Section 5.7.49.

If sewage will be discharged to public sewer, the local water company must be consulted to ensure that adequate sewer capacity is available, and no adverse effects will occur because of the connection. If treatment and discharge at the site is required, there will need to be a consideration of any potential impacts of this discharge and confirmation will need to be provided that a water discharge activity permit will be sought. If road transport to an offsite disposal facility is required, then there should be regard for this within the waste management procedures.

Flood Risk and Modelling

Document Reference(s): EIA Scoping Report, Volume I Main Report, Section 5.7 and Table 5-14

Issue	Flood risk is proposed to be scoped out for all phases of the Proposed Development, despite much of the site being located in areas at risk of flooding and the CRC crossing multiple Main Rivers.
Impact	Risk of the Proposed Development being at risk of flooding, not being safe for the duration of its lifetime, and causing an increase in offsite flood risk.
Solution	Scope the Water Environment into the EIA and specifically scope in all aspects of flood risk for all phases of the Proposed Development. Appropriate flood risk mitigation must be provided, where appropriate. Further details on the proposals and EIA content in relation to flood risk and modelling are provided in Appendix B.

Appendix B – General advice on the proposals and EIA content

Biodiversity

Document Reference(s): EIA Scoping Report, Volume I Main Report, Section 4.4.1	
Issue	Construction is estimated to take place over approximately 24 months, yet there appears to be no mention of ecological surveys being repeated prior to construction. The Chartered Institute of Ecology and Environmental Management (CIEEM) Advice Note 'On the lifespan of ecological reports & surveys' states that species survey data may be out of date around 12-18 months following a survey.
Impact	Risk of there being changes in the baseline of species presence and distribution which the contractors are unaware of. For example, otters are highly transitory species, and an otter could construct a holt prior to or during construction which could result damage or destruction of holts or disturbance during construction. This would be an offence under the Conservation of Habitats and Species Regulations 2017 (as amended).
Solution	Pre-construction checks/surveys should be conducted prior to construction, to determine any changes in presence or distribution of species. Pre-construction checks should especially be undertaken at watercourse crossing points, even if no places of shelter (e.g. otter holts or water vole burrows) have been found.
Additional narrative/explanation	
The development should also consider potential enhancement opportunities within the design. For example, potential enhancement may include habitat improvements or enhancing connectivity of the riverine corridor through the development.	

Document Reference(s): EIA Scoping Report, Volume I Main Report, Sections 4.3.29 and 4.3.34	
Issue	Underground cables will be installed using trenching and possibly HDD.
Impact	Risk of entrapment of mammals such as otters within compounds and trenches associated with cable installation.
Solution	Cover-over open trenches to prevent wildlife from falling in and place a ramp to enable wildlife to escape. Securely fence compounds and trenches during construction.

Document Reference(s): EIA Scoping Report, Volume I Main Report, Section 4.4.3	
Issue	Site preparation activities include the upgrading or construction of watercourse crossing points, which includes culverts.
Impact	Culverts have the potential to fragment habitats and reduce connectivity, making dispersal and commuting for some species difficult. Culverts also put an added pressure on otters during periods of high water-levels, as culverts offer little room for conveyance and put otters at risk of being killed when crossing roads.
Solution	Should any access tracks be required to cross watercourses or ditches, we would expect to see an open-span bridge design. We would encourage improving existing watercourse crossing points, for example, removing a culvert and replacing it with an open-span bridge.
Additional narrative/explanation	
For the purpose of practicality, we may agree to the culverting of ditches that are proven to be of poor ecological quality (e.g. ditches are dry for most of the year).	

Document Reference(s): EIA Scoping Report, Volume I Main Report, Section 4.4.8 and Table 5-7	
Issue	There is no commitment to carrying out Invasive Non-Native Species (INNS) surveys to determine presence, distribution and abundance, nor is there mention of producing INNS or Biosecurity Management Plans.
Impact	Lack of biosecurity planning can lead to the accidental spread of INNS. Without an INNS Management Plan, there is also the risk of not appropriately responding to/managing INNS should they be discovered during construction. Lack of INNS planning can lead to accidental spread, which is an offence under the Wildlife and Countryside Act 1981.
Solution	An INNS or biosecurity management plan should be submitted as part of the ES. A pathway specific risk assessment should be considered identifying any pathways for spread during construction, operation and decommissioning. Dedicated INNS surveys should be planned and delivered prior to construction to inform proposed management and embedded biosecurity measures.
Additional narrative/explanation	
<p>We note that Table 5-7 mentions INNS in the context of Major Accidents and Disasters, and states that INNS would be controlled via the implementation of the Landscape and Ecological Management Plan (LEMP), however no further details are provided regarding what the controls might look like. If INNS management and biosecurity measures are committed to, we have no preference as to whether this takes the form of a dedicated INNS Management Plan, or if it is included as measures within the CEMP and LEMP.</p> <p>Where the presence of INNS has been identified, a specific method statements for the INNS species identified (and the locations within which they are present) could be produced, along with specific measures to be implemented during construction works and/or vegetation and soil removal to ensure that there is no spread of INNS.</p> <p>Known locations of INNS could be marked on the site and vehicle movements restricted in the vicinity of these locations until the INNS have been appropriately removed or treated.</p>	

Document Reference(s): EIA Scoping Report, Volume I Main Report, Section 6.2.1	
Issue	Reference is not made to The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024..
Impact	Risk of not considering environmental definitions in legislation in respect of BNG, such as 'irreplaceable habitat', along with related offences to said habitats.
Solution	Include reference to The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024 within Section 6.2.1, for completeness.

Document Reference(s): EIA Scoping Report, Volume I Main Report, Section 6.5.4	
Issue	Embedded mitigation measures will include the incorporation of a riparian buffer around ditches and watercourses; however, the report does not specify where the buffer measures from.
Impact	Risk of implementing an insufficient buffer between the development and any watercourse or ditch, which could hinder the free movement of riparian mammals up and down the system and prevent the maintenance of the natural river corridor.
Solution	The riparian buffer should measure at least 10m from the bank-top of the watercourse.

Groundwater & Contaminated Land

Document Reference(s): EIA Scoping Report, Volume I Main Report, Table 4-1	
Issue	We note that the Maximum Design Scenario for the BESS and substation include piled foundations to a maximum depth of 12 and 15 m bgl respectively. The number and location of BESS and the location of the substations have not been included in the design yet. HDD has also been proposed.
Impact	Risk of rapid migration of contamination into groundwater through the installation of deep piled foundations creating pathways. HDD may also introduce contaminants into the water environment if not carefully managed.
Solution	The outline CEMP should include reference to mitigation measures for construction activities. This should include a Foundation Works Risk Assessment, Hydrogeological Risk Assessment (HyRA) for HDD and a bentonite breakout plan.
Additional narrative/explanation	
Once the BESS drainage has been designed, the Applicant will need to confirm how they will ensure that the installation of deep piles will not compromise the creation of a fully impermeable drainage systems at these locations.	

Document Reference(s): N/A	
Issue	The report does not mention the thermal impact of buried HV cables.
Impact	Risk of heat pollution in groundwater.
Solution	Consider the thermal impacts of buried HV cables on hydrogeology.
Additional narrative/explanation	
<p>Heat as a groundwater pollutant was introduced in 2023 via the Environmental Permitting (England and Wales) (Amendment) (England) Regulations 2023 SI No.2023/651. As such, discharges that might lead to an input of heat into groundwater are groundwater activities. We aim to be proportionate and pragmatic in our application of the principles of the Environmental Permitting Regulations (EPR) 2016 and requiring a permit would feel disproportionate for many activities at or near the ground surface.</p> <p>At this stage we require the potential thermal implications of buried HV cables, in relation to risks to groundwater, to be considered via desk-based assessment. In those rare instances where we are concerned that there are risks which require ongoing control or management, we may opt to regulate it as a groundwater activity under schedule 22 of the EPR 2016.</p> <p>The Environment Agency currently has no specific guidance relating to the potential thermal implications of buried infrastructure including cables. We suggest that our guidance for ground source heating and cooling systems should be used as a guide. The following link contains relevant information, including thermal plume modelling and an interactive system map and spreadsheet: Environmental impacts of temperature changes from ground source heating and cooling systems - GOV.UK.</p>	

Document Reference(s): EIA Scoping Report, Volume I Main Report, Section 7.2.4	
Issue	The Environment Agency's LCRM Guidance has been omitted from Section 7.2.4, despite being mentioned elsewhere within the Ground Conditions and Contamination Section of the report.

Impact	Lack of consistency creates a lack of confidence that the appropriate guidance has been followed.
Solution	Update Section 7.2.4 to include the LCRM guidance.

Document Reference(s): EIA Scoping Report, Volume I Main Report, Sections 5.7, 7.1.2 and 7.4.3

Issue	Omission of sensitivity classifications for controlled water receptors.
Impact	Risk of sensitive receptors not being adequately considered.
Solution	Sections 5.7 and 7.4 should be updated to include sensitivity classifications for controlled water receptors.

Additional narrative/explanation

As mentioned previously, aquifers have not been mentioned within Section 7 and groundwater has not been considered as a receptor.

Much of the site is underlain by superficial deposits and sandstone bedrock which are classified as Secondary A aquifers. These would fall under the Medium sensitivity rating within the Design Manual for Roads and Bridges (DMRB) LA 109 guidance that is being followed (as stated in Sections 7.1.2 and 7.4.3).

Please note that private water supplies are not included in DMRB LA 109, but they should be assigned at least a high sensitivity rating. Private groundwater abstractions for potable use or food production are afforded a default 50m radius Source Protection Zone (SPZ) 1.

Document Reference(s): EIA Scoping Report, Volume I Main Report, Sections 5.2.27 and 7.7.1

Issue	The possibility of encountering unexpected contamination during and beyond the construction of the scheme is mentioned briefly, and it is stated that relevant mitigation measures will be included within the outline CEMP which will be secured via the DCO. However, the report does not mention that relevant mitigation will also be included in the outline OEMP and outline DEMP.
Impact	Risk of impacts to controlled waters not being adequately assessed if there is no protocol for how to manage unexpected contaminated in accordance with LCRM guidance for all phases of the development.
Solution	There should be a commitment to managing unexpected contamination within the outline CEMP, outline OEMP and outline DEMP.

Additional narrative/explanation

Our suggested process is:

1. In the event that contaminated land, including groundwater, is found at any time when carrying out the authorised development, which was not previously identified in the ES, then no further development (unless otherwise approved in writing by the relevant authorities) shall be carried out within the identifiable perimeters of the area in which the suspected contamination is located. It must be reported as soon as reasonably practicable to the Local Planning Authority (LPA), and where necessary, the Environment Agency, and the undertaker must complete a risk assessment of the contamination in consultation with the LPA, and where necessary, the Environment Agency.
2. Where the undertaker determines that remediation of the contaminated land is necessary, a written scheme and programme for the remedial measures to be taken to render the land fit for its intended purpose must be submitted to and approved in writing by the LPA, following consultation with the Environment Agency.

3. Remediation must be carried out in accordance with the approved scheme under sub paragraph (2).
4. Following the implementation of the remediation strategy approved under sub-paragraph (2), a verification report, based on the data collected as part of the remediation strategy and demonstrating the completion of the remediation measures must be produced and supplied to the relevant planning authority and the Environment Agency.

Document Reference(s): EIA Scoping Report, Volume I Main Report, Section 4.5.4

Issue	Batteries may be replaced up to four times during the lifetime of the project. Potential for contaminant leakage from waste batteries stored on site prior to disposal.
Impact	Risk to land and controlled waters. For example, this could be due to chemical leakage, or fire water runoff in the event of extinguishing a waste battery fire.
Solution	Waste and/or damaged BESS batteries should be stored and managed in a way that means they do not pose a contamination risk. Details on this could be provided in the outline BSMP.

Additional narrative/explanation

Any temporary holding area for batteries awaiting loading for removal should be suitable to avoid presenting a contamination risk. Stored damaged batteries are susceptible to spontaneous combustion. A fire watch may be necessary.

Document Reference(s): EIA Scoping Report, Volume I Main Report, Sections 4.6.3 and 5.7.56

Issue	The report contains inconsistent information regarding the fate of cables at decommissioning.
Impact	The current intention for removal of cables is unclear.
Solution	Future reports should contain consistent information.

Additional narrative/explanation

Section 4.6.3 states “the underground ducting and joint bays within the CRC will be decommissioned in accordance with the latest regulations and good practice at that time but are anticipated to be left in-situ to minimise adverse environmental effects. It may be possible to remove the cable itself by extracting it at the joint bays from within the ducting, so that the cable can be recycled”.

Section 5.7.56 states: “during decommissioning, potential impacts would be similar to the construction phase, although it is anticipated that buried cables may be left in situ beneath watercourses”.

The Environment Agency does not currently have specific guidance or a regulatory position about this in the context of groundwater and land contamination. However, we recommend that cables are removed entirely at the end of the project’s functional lifespan. Further, we would ask the Applicant to consider the potential effects of cables being left in situ, such as deterioration of plastic and metal over extended time periods, and the release of these materials into soil and groundwater.

The Applicant should refer to regulatory guidance and general best practice at the time of decommissioning. We strongly recommend that the applicant considers full cable removal in their designs. Allowance should be made at this stage for cable removal should it later be

deemed necessary, so that the method of installation does not mean this cannot be reasonably achieved.

It is important to consider that use of plastic ducting to facilitate easy removal of cables may have its own impacts. This ducting could degrade over time in a similar manner to plastic cable housing, with some residual risk to sensitive receptors.

Water Quality

Document Reference(s): EIA Scoping Report, Volume I Main Report, Section 2.2.6	
Issue	Section 2.2.6 suggests that physical surveys and monitoring have been undertaken to establish the baseline conditions, but it is unclear if this relates to water quality, or if any further monitoring is proposed.
Impact	If a water quality monitoring plan is not suitably designed it may not be able to capture a suitable baseline or detect relevant trends in water quality deterioration or improvement during the phases of the Proposed Development.
Solution	A water quality monitoring plan should be provided when the ES is produced. This should clarify locations, frequency, quantity and possible methods of monitoring. These locations should include monitoring upstream and downstream of any proposed surface water outfalls and water crossings. The Applicant should confirm how they intend to secure this existing monitoring commitment.
Additional narrative/explanation	
Water quality monitoring should be conducted by the Applicant pre-construction, during construction and for the first few months of operation. The frequency should occur at least monthly and the locations should be upstream and downstream of any water crossings or discharges. Methods of site walkovers for visual assessment, use of hand-held devices in-situ and samples sent to a laboratory should be confirmed. The water quality monitoring plan could be secured via the CEMP and OEMP.	

Document Reference(s): EIA Scoping Report, Volume I Main Report, Section 5.7.5	
Issue	Section 5.7.5 lists data sources used to inform the baseline for the Water Environment, but it does not include the Water Quality Explorer.
Impact	Risk of the water quality baseline being based on incomplete information if not all relevant data is used.
Solution	Map Explorer Water Quality Explorer should be used to provide further information on the water quality baseline.

Document Reference(s): EIA Scoping Report, Volume I Main Report, Sections 2.5.4 and 2.5.5	
Issue	General construction best practice is unclear. Section 2.5.4 states that there will be buffer distances from environmental receptors and Section 2.5.5 states mitigation will be included in the outline CEMP, however details of said mitigation are unknown at this stage.
Impact	Risk of deteriorating water quality if hazardous substances during construction get into surface runoff and is subsequently discharged.
Solution	The outline CEMP should include potential impacts from earthworks, concrete and any spills of hazardous substances.

Additional narrative/explanation

An outline CEMP should include (but not be limited to) the following:

- Buffer distances of at least 10m from watercourses from top of bank.
- Refuelling to only take place on impermeable surfaces, and in bunded areas.
- Chemical, oil and fuel storage to be bunded, with impermeable base, volume sized for 110% and covered to protect from accumulation of rainwater.
- Parking areas and temporary construction compounds should use drip trays and oil interceptors.
- Concrete/cement works should be minimised during heavy precipitation events and carried out during dry months. Pre-cast units could be used where possible.
- Collecting and removing any contaminated water from site (i.e. from wheel wash and concrete washout facilities), and not allowing this to be discharged to surface waters.

The Applicant should be aware of [Pollution prevention for businesses - GOV.UK](#) and [Oil storage regulations for businesses - GOV.UK](#).

Document Reference(s): EIA Scoping Report, Volume I Main Report, Sections 4.3.11, 4.3.13, 4.3.14 and 5.7.61

Issue	Lack of detail regarding what drainage and pollution controls that will be in place at the conversion units and substations.
Impact	Risks to water quality in the event of a fire event or leak from equipment at the substation.
Solution	The transformers, and other equipment containing hazardous substances, must be bunded, and there should be suitable drainage designs such that in the event of a fire or pollution incident at the conversion units or substations, the drainage is isolated and any contaminated water cannot enter surface watercourses.

Additional narrative/explanation

Section 5.7.61 does not identify a water quality impact from firewater at the substation.

Document Reference(s): EIA Scoping Report, Volume I Main Report, Section 5.7.63

Issue	Drainage at the BESS and battery management is unclear. Section 5.7.63 describes water being stored in a gravel sub-base prior to infiltrating into the ground, however this is not a sealed drainage system.
Impact	Risk of the Proposed Development causing a deterioration in water quality and an unacceptable risk to water environment receptors if drainage from BESS and substations are inappropriately designed.
Solution	BESS and substations must have a sealed drainage system with automatically closing penstock valves which isolate any contaminated water. Details of this should be provided in the outline BSMP.

Additional narrative/explanation

Due to the risk of chemicals in contaminated firewater, it would be our preference for the developer to considering tankering firewater it offsite, rather than treating and discharging. However, if discharge at the site is required, consideration will need to be given to the potential impacts of this discharge and confirm will need to be provided that a water discharge activity permit will be sought from the Environment Agency.

Additional guidance in relation to discharging and permits is available here: [Discharges to surface water and groundwater: environmental permits - GOV.UK](#).

Flood Risk and Modelling

Document Reference(s): EIA Scoping Report, Volume I Main Report, Section 5.7.38	
Issue	The report includes no commitment to assessing the potential impact of the Proposed Development on existing flood defences.
Impact	Risk of the Proposed Development causing unmitigated damage and/or reducing the performance of flood defences over the lifetime of the project, especially under future climate scenarios.
Solution	The Flood Risk Assessment (FRA) must include full details of flood defences and associated assets, including condition, crest levels, and standard of protection, and assess potential impacts and mitigation.

Document Reference(s): EIA Scoping Report, Volume I Main Report, Table 5-14	
Issue	Flood risk from rivers/sea during the construction phase has been proposed to be scoped out of the EIA on the basis that impacts will be mitigated through the implementation of embedded mitigation, and the production of a CEMP and FRA.
Impact	Risk of the Proposed Development causing temporary increases in flood risk and impacts to third parties during the construction phase.
Solution	Scope the Water Environment into the EIA and specifically scope in impacts during the construction phase.

Additional narrative/explanation

The Applicant must provide details of the storage of materials, site compounds, temporary roads and/or crossings. An assessment of the impacts this may have on flood risk should be assessed and appropriate mitigation provided.

New watercourse crossings should be minimised. New crossings should be clear span bridges wherever possible.

It is best practice to adhere to the following requirements:

- Soffit height of bridges must be a minimum of 600mm above the 1 in 100yrs plus climate change allowance flood level
- All abutments must be set back a minimum 1m from the top of bank/landward toe of flood defences and as minimal as possible
- Any loss of floodplain due to abutments and ramps will need to be compensated for
- All parapets and railings need to be permeable and as open as possible with a minimum 100mm spacing.

Document Reference(s): EIA Scoping Report, Volume I Main Report, Section 5.7.69	
Issue	The report does not consider the potential flood risk impacts on flood flow routes and storage losses.
Impact	Risk of the Proposed Development causing an increase in flood risk to third parties.
Solution	It is noted that some solar PV panels may fall within areas of Flood Zone 2 and 3. The Applicant will need to assess the impact of solar panel support frames on flood risk elsewhere to ensure that any increases or deflections in flood flow routes are contained within the proposed development area. If there are any impacts outside of the draft Order Limits, appropriate mitigation will need to be implemented.

Additional narrative/explanation

Section 5.7.69 notes that potential flood risk effects during the operational phase include increased surface water runoff and damage to new electrical infrastructure from flooding. Whilst it is noted and welcomed that all sensitive electrical infrastructure such as the BESS and substations will be located outside of Flood Zones 2 and 3, it appears as though the solar PV panels will be in areas of flood risk. There is the potential that solar PV panel support frames could impact on flood storage and flood flow conveyance. Additionally, they could pose a blockage risk. The Applicant should provide supporting evidence that there is no impact of flood risk elsewhere from solar panel support frames and have regard for paragraph 5.8.12 within the overarching National Policy Statement for Energy (EN-1).

It is unclear at this stage exactly where HDD receptor and launch pits will be located. HDD receptor and launch pits should ideally be located outside of flood risk areas and more specifically should avoid Flood Zone 3a and 3b, unless suitable justification and mitigation can be provided.

Document Reference(s): EIA Scoping Report, Volume I Main Report, Section 5.7.70	
Issue	The proposed scope of the EIA does not currently include an assessment of the impacts of climate change on flood risk to and from the Proposed Development.
Impact	Risk of underestimating flood risk over the lifetime of the Proposed Development, leading to insufficient mitigation.
Solution	Scope the Water Environment into the EIA and specifically scope in the impacts of climate change on flood risk to and from the Proposed Development. The Applicant will need to undertake an assessment of the impact climate change may have on the design event for the lifetime of the development. This should use the 2080s higher central allowance for climate change.

Document Reference(s): EIA Scoping Report, Volume I Main Report, Section 5.7.70	
Issue	It is not clear what freeboard allowance is being proposed.
Impact	Risk of designing infrastructure inappropriately.
Solution	0.6m of freeboard should be provided above the design event. As the development would be classed as Essential Infrastructure, the design flood event would be the 1% (1 in 100) annual exceedance probability (AEP) scenario plus higher central climate change.

Additional narrative/explanation

Section 5.7.70 states that “fixed Solar PV Panels will have a minimum clearance of 0.4 m no less than 0.6 m above the 0.1% Annual Exceedance Probability (AEP) flood level”. It is not clear whether a 0.6 metre or 0.4 metre freeboard is being proposed here. We would advise a 0.6 metre freeboard allowance.

A credible maximum scenario should be used as a sensitivity test which in the context of fluvial flooding would be the upper climate change allowance. If the Applicant is proposing to use the 0.1% (1 in 1000) AEP scenario to inform design flood levels, they will need to provide supporting evidence that this is either representative or conservative when compared to the 1% (1 in 100) AEP higher central and upper climate change scenarios.

Further details regarding the application of climate change for Essential Infrastructure can be found at: [Flood risk assessments: climate change allowances - GOV.UK](https://www.gov.uk/government/consultations/flood-risk-assessments-climate-change-allowances).

Document Reference(s): EIA Scoping Report, Volume I Main Report, Section 4.4.3	
Issue	It is not clear whether the perimeter fencing proposed as part of the Proposed Development will have an impact on flood risk.
Impact	Flood risk elsewhere could be increased due to blockage risk and diversion of flood flow routes.
Solution	Consideration should be given to the effects of perimeter fencing on flood risk elsewhere, particularly where this intersects the Flood Zones and particularly the functional floodplain (Flood Zone 3b). Where fencing intersects flood risk areas it should be designed to ensure blockage risk is kept to a minimum and that there are no impacts on flood flow routes.
Additional narrative/explanation The FRA should clearly highlight the flood risk impacts of any proposed fencing on flood flow routes and demonstrate that there will not be an adverse impact elsewhere in line with paragraph 5.8.12 within EN-1.	

Appendix C – Additional advice for the Applicant

Watercourse crossings

The following are general guiding principles to consider when designing watercourse crossings to avoid negatively affecting geomorphology and natural processes:

- Avoid unnecessary interference with natural processes. For instance, encourage use of trenchless techniques such as HDD to minimise the likelihood of cables entering the water environment.
- Ensure watercourse crossing design is informed by assessment of fluvial processes and geomorphology. For example, depth of HDD crossing should consider the likelihood of vertical channel change.
- Avoid designs which present legacy risks to natural processes and geomorphology beyond the project lifespan. For example, infrastructure such as access tunnels which are left in-situ after decommissioning could be exposed by future coastal erosion or river movement, becoming an impediment to natural processes.
- Consider opportunities to deliver WFD mitigation measures/BNG uplift as part of the design.
- Avoid preventing delivery of mitigation measures, e.g. avoid bringing cables to surface level in floodplains earmarked for future river restoration or flood defence works (including construction of bypass channels).

Notes:

- i. WFD applies to all surface waterbodies, not just those designated for monitoring purposes.
- ii. Small watercourses and WFD - watercourses with a catchment less than 10km² connected to a downstream WFD waterbody take the classification of that waterbody.
- iii. BNG guidelines indicate that structures built within 10 m of the bank top of a watercourse qualify as encroachment, which may affect the uplift score calculated using the BNG Watercourse metric.

BNG guidance is mentioned here because the Environment Agency's usual easement for structures, operations, launch pits is to be at least 8m away from the watercourse bank or landward base of fluvial defence structure/embankment (16m if defence structure is for tidal purposes). As stated in the note above, BNG watercourse metric considers anything within 10m of bank top to be encroaching on the watercourse.

- Any potential construction, operational, and decommissioning phase impacts that the proposed scheme may have on the river must be subject to a WFD Assessment to the satisfaction of the Environment Agency.
- Any infrastructural developments on river/floodplain environments should be designed and delivered to have a minimal impact on natural river dynamics (e.g. erosion, deposition, meander migration etc.) and should not place any significant limitations on future river restoration projects.
- Geomorphologically dynamic behaviour is deemed likely to intensify in the next decades in line with Flood Estimation Handbook ([Flood Estimation Handbook \(FEH\) | UK Centre for Ecology & Hydrology \(ceh.ac.uk\)](#)). Therefore, any infrastructure developments should also take some account of the likelihood for increased lateral and vertical river dynamics anticipated to result from continued hydro-climatic intensification (e.g. 'a flood-rich epoch') over the remainder of the 21st century (i.e.,

future proofed designs that are not just based on present-day baseline geomorphological configuration/behaviour).

- If river crossings (bridges, culverts, and buried cables) are required as part of the development, the Environment Agency would expect to see geomorphologically robust designs that will cause minimal impacts on natural fluvial processes operating in the river/floodplain environment over the course of the 21st century.

Further guidance in regard to river crossings can be found in the following document:

- SEPA, 2010. Engineering in the water environment: good practice guide River crossings Second edition. SEPA

Watercourse sensitivity

- Care should be taken by applicants when determining watercourse sensitivity, especially the use of Q95 scores. Rivers with a higher Q95 flow are not more sensitive than rivers with a lower Q95. In the case of water quality, the reverse of this is true, with less dilution meaning a higher sensitivity to change. Some watercourses with low Q95 may also be winterbournes, and therefore cannot accommodate change easily, as they would be dry for most of the year.
- WFD designation is a method of monitoring and classifying the ecological health of the water environment and not an indication of greater or lesser sensitivity to change. Therefore, watercourses with a WFD designation are no more sensitive than those which have not been designated.
- Sensitivity to change cannot be determined from a desk study alone. When determining the sensitivity of a watercourse, the applicant should ensure that professional judgement and the results of any surveys are also incorporated into the assessment.

BESS site design

We refer the Applicant to 'The Environment Agency's approach to groundwater protection' (February 2018, version 1.2), particularly policies, A2 Precautionary principle, A4 Responsibility for assessments, A5 Supply of adequate information and C1 Nationally or regionally significant schemes.

The NFCC has published detailed guidance on recommended fire protection measures for BESS sites. We recommend the applicant refers to this when designing the scheme: [Grid Scale Battery Energy Storage System planning – Guidance for FRS \(nfcc.org.uk\)](https://www.nfcc.org.uk/guidance-for-frs).

Firewater drainage from the BESS units should therefore be contained within a sealed, impermeable drainage solution, unless the developer can demonstrate an alternative method which provides sufficient mitigation. Without this sealed drainage the level of risk present will depend on the receiving receptors and the Planning Inspectorate will decide if this risk is acceptable. We assess the reasonable worst-case consequence of a failure not the likelihood. It is the Applicant's responsibility to demonstrate that risk to the water environment will be safely managed.

The drainage solution should demonstrate that contaminated firewater can be adequately contained within the site to ensure that there is no discharge of polluted water to ground or surface water bodies. The scheme should include an impermeable base or layer beneath the battery unit compound to ensure infiltration beneath the site can be controlled.

Any system for the storage of contaminated firewater should have sufficient capacity/headroom for the volumes expected in the event of a fire, even during periods of intense rainfall. The system for containing firefighting effluent should be automatic with a backup system in place in case of power failure.

Where BESS sites are designed with fire extinguishing systems that do not rely on water, fire crews may still use water for boundary cooling, and this can contain pollutants from the burning units, including any associated chemical leakage, and dust and ash from the air. As such, we expect firewater capture to be included in any design.

The drainage system should incorporate a penstock valve automatically triggered in the event of a BESS fire. The outline OEMP should include details of ongoing maintenance and testing of penstock valve(s) as traditional penstocks, when not operated for a long period of time, have historically been known to seize up and thus be inoperable at times of emergency. The maintenance programme should include clearly defined frequency of checks to guarantee these remain operational at all times to ensure that they perform in the event of a fire. The automatic shutoff valves should also include a manual override in case the automation fails.

Drainage solutions at BESS often include a permeable substrate above an impermeable lining. The impermeable lining will prevent any infiltration and protect groundwater but there is the potential for pollutants to attach to the surface of the permeable stone in the lined areas which could be re-mobilised in surface water runoff and reach the water environment, unless the containment areas are managed after a fire event.

To ensure that the permeable stone does not act as a source of secondary pollution once drainage is reinstated following a fire event, we seek a commitment from the Applicant that, in the event of a fire, the stone surfacing is fully cleaned, or removed and replaced before any drainage valves can be reopened.

Substation Drainage

The Applicant should clearly outline the committed design mitigation to prevent contaminants from substation plant containing hazardous chemicals, such as oil transformers, from releasing contamination to the surface water drainage system from both spills and leaks during operation and any fire events.

Suitable lining and a sealed drainage systems are important to prevent any contaminants reaching groundwater or surface waters via runoff. The Applicant should confirm that the substation will be impermeably lined.

In addition to comments above, the Applicant could commit to using a dry-type transformer which does not contain flammable oil, and can decrease the risk of fire at a substation.

Even if a dry-type transformer is used, and the risk of a substation fire is significantly lowered, the equipment at the substation still has a risk of leaks or spills. Therefore, the Applicant should provide more detail of the hazardous and polluting substances anticipated to be present within Substation plant and equipment, including transformer type, and the design and operational measures to contain these substances, such as:

- Secondary containment systems such as double-skinned tanks and bunding;
- Leak detection and level monitoring systems;

- Bund water management;
- Oil water interceptors/separators in the drainage system.

Oil containment must be in accordance with the Control of Pollution (Oil Storage) Regulations 2001 and the Applicant should employ best practice pollution controls for oils and other hazardous and polluting substances. Further information available here: [Pollution prevention for businesses - GOV.UK](#)

The Applicant should provide a detailed drainage plan for the site. This information must satisfactorily demonstrate that the risks to controlled waters have been fully understood and can be addressed through appropriate measures.

This information should include, but not be limited to:

- A detailed drainage plan which demonstrates, in the event of an emergency, that contaminated firewater can be adequately contained within the site to ensure that there is no discharge of polluted water to ground or surface water bodies. The scheme should include an impermeable base or layer beneath the battery unit compound to ensure infiltration beneath the site can be controlled.
- Any system for the storage of contaminated firewater should have sufficient capacity/headroom for the volumes expected in the event of a fire, even during periods of intense rainfall.
- The system for containing firefighting effluent should be automatic with a backup system in place in case of power failure.

Use of per- and polyfluoroalkyl substances (PFAS)

We strongly recommend that all solar panels are PFAS-free. Some solar panels are treated with a PFAS coating. PFAS is not mentioned in the EIA Scoping report, but there is a chance that PFAS could be present in the materials or coating applied to the panels. If panels containing PFAS are used, we suggest that there is consideration of this in the OEMP and DEMP. For example, if PFAS coating is damaged there is a risk of persistent chemicals entering the natural environment during heavy rainfall, washing, maintenance, and removal. The OEMP should also incorporate measures to minimise the risk of panel coatings becoming damaged via 'thermal shock' such as if cleaned whilst at a high temperature due to prolonged exposure to sunlight.

The Applicant should ensure that any bentonite used for trenchless drilling, or elsewhere in the scheme, has not been treated with chemicals containing PFAS. Fuel, oils and other chemicals, such as cleaning agents and decontaminants, should be PFAS-free wherever possible.

We recommend checking with manufacturers if the materials used in panels or bentonite pellets contain PFAS. If the manufacturers are unknown, the Applicant should commit to using PFAS-free materials. The Applicant should also determine if regular panel washing will occur during operation and maintenance phase which could introduce a pathway between the panels and water receptors of any chemicals in the coating.

Environmental permits

If dewatering is required, it will require an abstraction licence if it doesn't meet the criteria for exemption in [The Water Abstraction and Impounding \(Exemptions\) Regulations 2017](#)

[Section 5: Small scale dewatering in the course of building or engineering works](#). It may also require a discharge permit if it falls outside of our [regulatory position statement for dewatering discharges](#).

If the Applicant does not meet the exemption and requires a full abstraction licence, applicants should be aware that some aquifer units may be closed for new consumptive abstractions in this area. More information can be found on GOV.UK: [Abstraction licensing strategies \(CAMS process\)](#) and [Apply for a water abstraction or impounding licence](#). If the dewatering activity can be demonstrated to be discharged to the same source of supply without intervening use (i.e. non-consumptive), this will increase the likelihood of a licence being granted.

Please note that the typical timescale to process a licence application is 9-12 months. The Applicant may wish to consider whether a scheme-wide dewatering application rather than individual applications would be beneficial. We suggest talking to our National Permitting Service early in the project planning.

Temporary dewatering of wholly or mainly rainwater that has accumulated in an excavation may be exempt from an Environmental Permit for a Water Discharge Activity. More information can be found on our website: [Temporary dewatering from excavations to surface water: RPS 261](#). Note that this does not permit discharge of groundwater from a passive or active dewatering activity or permit the abstraction of groundwater.

The applicant may also need to consider discharge of groundwater, especially if it is contaminated. More information can be found on our website: [Discharges to surface water and groundwater: environmental permits](#).

The use of drilling muds for the directional drilling may require a groundwater activity permit unless the 'de minimis' exemption applies. Early discussion about this is also recommended.

Waste on site

Excavated materials that are recovered via a treatment operation can be re-used on-site under the CL:AIRE Definition of Waste: Development Industry Code of Practice. This voluntary Code of Practice provides a framework for determining whether excavated material arising from site during remediation or land development works are waste.

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on-site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

The Environment Agency recommends that developers should refer to:

- [CL:AIRE Definition of Waste: Code of Practice](#)
- [EA Regulatory Position Statement 215](#): Treating small volumes of contaminated soil and groundwater.

Regarding the potential for the importation of waste material that may be required to support any construction work, then the appropriate waste management legislation should be followed. The scoping report has referred to the use of aggregate, hardcore and gravel to be

used for foundations or levelling substrate. The importation of waste would require the appropriate waste authorisation.

Small scale importations of waste which are considered lower risk could be carried out under an exemption provided the waste types and quantities can be met and the specific criteria adhered to. See: [Waste exemption guides - GOV.UK](#) and [Waste exemptions: how to choose, register and pay - GOV.UK](#).

Larger scale waste importation would fall under the EPR permitting regulations and stricter controls would apply. Guidance again can be found here: [Check if you need an environmental permit - GOV.UK](#)

If an environmental permit is required to undertake the work, the Environment Agency offers pre-application advice. See: [Get advice before you apply for an environmental permit - GOV.UK](#).

Waste to be taken off site

Contaminated soil that is, or must be, disposed of, is waste. Therefore, its handling, transport, treatment and disposal is subject to waste management legislation, which includes:

- Duty of Care Regulations 1991
- Hazardous Waste (England and Wales) Regulations 2005
- Environmental Permitting (England and Wales) Regulations 2010
- The Waste (England and Wales) Regulations 2011

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standards BS EN 14899:2005 'Characterisation of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan'. The permitting status of any proposed treatment or disposal activity should be clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

If the total quantity of waste material to be produced at or taken off site is hazardous waste and is 500kg or greater in any 12-month period, the developer will need to register with us as a hazardous waste producer. Refer to [our website](#) for more information.

Landfill sites

The report mentions that some activities will take place in close proximity to historic landfills. Environment Agency records indicate that there are a number of historic landfills in the area, many of which predate the Environment Agency and that have been non-operational for some time. For that reason, information held by the Environment Agency regarding these appears to be somewhat limited.

Sustainable Drainage Systems (SuDS)

Section 2.5.4 suggests embedded mitigation may include SuDS, however the type proposed is unclear at this stage. Section 2.5.5 lists the management plans that are typically submitted as part of the DCO application which secure the implementation of embedded mitigation

measures. A Surface Water Management Plan or Drainage Strategy have not been included in this list.

Surface water management strategy must be suitably designed to manage the risks from sediment, hydrocarbons, heavy metals and other hazardous substances which could get into surface water runoff and decrease water quality if these contaminants reach receiving surface watercourses. If SuDS are unmaintained, debris and/or sediment could accumulate and prevent them from effectively managing drainage.

When the ES is produced, the Applicant should make it clear which SuDS are proposed at which areas of the site, and how they will be used to improve water quality. Each SuDS will require a maintenance schedule commitment to ensure they perform optimally. This can be informed by the CIRIA SuDS Manual (C753F). The Applicant should produce a document which will explain how surface water will be managed during each phase of development.

The Government's expectation is that SuDS will be provided in new developments wherever this is appropriate. The Environment Agency supports this expectation.

Where infiltration SuDS are to be used for surface run-off from roads, car parking and public or amenity areas, they should:

- Be suitably designed
- Meet Governments non-statutory technical standards for sustainable drainage systems – these standards should be used in conjunction with the National Planning Policy Framework and Planning Practice Guidance
- Use a SuDS management treatment train – that is, use drainage components in series to achieve a robust surface water management system that does not pose an unacceptable risk of pollution to groundwater.

Where infiltration SuDS are proposed for anything other than clean roof drainage in a SPZ1, a hydrogeological risk assessment should be undertaken, to ensure that the system does not pose an unacceptable risk to the source of supply.

See the Environment Agency's approach to groundwater protection, position statement G13: [Groundwater protection position statements](#).

Flood Risk Activity Permits (FRAPs)

The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any of the following activities:

- Erecting any temporary or permanent structure in, over or under a main river, such as a culvert, outfall, weir, dam, pipe crossing, erosion protection, scaffolding or bridge
- Altering, repairing or maintaining any temporary or permanent structure in, over or under a main river, where the work could affect the flow of water in the river or affect any drainage work
- Building or altering any permanent or temporary structure designed to contain or divert flood waters from a main river
- Dredging, raising or removing any material from a main river, including when you are intending to improve flow in the river or use the materials removed
- Diverting or impounding the flow of water or changing the level of water in a main river

- Quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- Any activity within 8 metres of the bank of a main river, or 16 metres if it is a tidal main river
- Any activity within 8 metres of any flood defence structure or culvert on a main river, or 16 metres on a tidal river
- Any activity within 16 metres of a sea defence structure
- Activities carried out on the floodplain of a main river, more than 8 metres from the river bank, culvert or flood defence structure (or 16 metres if it is a tidal main river), if you do not have planning permission.

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>.

The Applicant should not assume that a permit will automatically be forthcoming once a DCO has been approved, and we advise the Applicant to consult us at the earliest opportunity.

Disapplication of FRAPs

If any of the works are likely to require a FRAP, we recommend that you inform the Environment Agency at the earliest opportunity as to whether you are seeking to disapply the EPR (England and Wales) 2016 for flood risk activities as part of the DCO (minimum 6 months before submission). Please note that the DCO will need to include protective provisions for our benefit if the disapplication of FRAPs is sought

Modelling

The Applicant should consider undertaking fluvial flood modelling for watercourses which intersect with the Order Limits to better understand fluvial flood risk. Please note, the Environment Agency holds detailed hydrology modelling for the River Arrow and River Avon. This can be requested via enquiries@environment-agency.gov.uk. It is important to note that some of our model data is old and may present limitations. Even the data which is more recent may not be suitable for the purposes someone wishes to use it for and should modelling work be required in connection with the activities, it will be necessary to check that the data used represents current risk, uses the latest available datasets, complies with current modelling standards, is at a scale suitable for the assessment to be undertaken, captures the detail required for a site-specific assessment, and makes use of current climate change allowances. This is emphasised within the guidance on Using Modelling for Flood Risk Assessments (December 2023) available online at [Using modelling for flood risk assessments - GOV.UK](#).

Environment Agency land interests

An area of land registered to the Environment Agency has been identified as being adjacent to one of the solar array sites associated with the Arrow Valley Solar project. It is unclear at this stage whether this land will be affected by the proposals and to what extent. The Applicant should contact the Environment Agency's Estates team directly at their earliest convenience to discuss all interactions between the proposed development and Environment Agency land. Please contact our Estates team on the following details: EstatesLandEng@environment-agency.gov.uk.

Scoping Consultation
PLANNING ACT 2008, as amended.
The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

Scoping Consultation Response on behalf of **Feckenham Parish Council**, a local Council, in relation to the possible National Significant Infrastructure Project application for the proposed 'solar photovoltaic electricity generating station and associated battery energy storage system with associated Cable Route Corridors and ancillary infrastructure and substation', known as '**Arrow Valley Solar and BESS**', located on 1,762 hectares of land which lies within Redditch Borough Council, Stratford upon Avon District Council and Wychavon District Council areas across the Counties of Warwickshire and Worcestershire, using Planning Inspectorate reference EN0110033).

Prepared by Christopher D Ford BA, MBA, MSc, PhD, MRTPI.

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1. INTRODUCTION

- 1.1. This **Scoping Consultation Response** on behalf of **Feckenham Parish Council**, a local Council, is in relation to the possible National Significant Infrastructure Project application for the proposed 'solar photovoltaic electricity generating station and associated battery energy storage system' with associated Cable Route Corridors and ancillary infrastructure and substation, known as 'Arrow Valley Solar and BESS', (the Proposal) located on 1,762 hectares of land which lies within Redditch Borough Council, Stratford upon Avon District Council and Wychavon District Council areas across the Counties of Warwickshire and Worcestershire (the Site), using Planning Inspectorate reference EN0110033.
- 1.2. This Consultation Response is submitted on behalf on **Feckenham Parish Council** (FPC or the Parish Council). The submission has been prepared by Dr Christopher Ford, a Chartered Town Planner specialising in the spatial aspects of energy systems and energy policy.
- 1.3. This Consultation Response covers the Proposal and its Site, matters suggested for scoping out by the developer, alternative being considered by the developer, the landscape and visual effects, cumulative effects assessment and other projects seeking to utilise the same transmission infrastructure in the local region (Feckenham substation). The Consultation Response closes with conclusion.

2. THE PROPOSAL AND SITE DISPERSAL

- 2.1. The Proposal Site is an extensive area of mainly farmland. The Site is highly dispersed with seven disconnected development blocks spread across an area stretching over some 11.5km north to south and 10.5km east to west. This extensive dispersal over a large area with pockets of development will inevitably increase the landscape and visual effects and other adverse impacts of the project, more than had the acreage been focused in a single location. Such a dispersed approach shifts the balance of adverse effects arising from the Proposal against the potential energy value resulting in unnecessary effects than would usually be required to achieve a given level of energy output. The developer should consider whether all of these separate blocks are really necessary and whether a more balanced approach would be to concentrate the developments into two or three concentrated blocks, if not a single block, rather than this extensive dispersal.

- 2.2. Unfortunately, developers frequently take an approach, which may be seen as gaming the planning process, of initiating schemes by presenting a high level of or maximised environmental effects and then later removing the worst excesses of the scheme. Such reductions are often presented as ‘responding to community concerns’. In practice this is a cynical misuse of the public participation process. It demonstrates that the developer(s) have not genuinely engaged in the required public participation process and their conduct through the subsequent planning process should be judged accordingly. Understandably the ‘interested public’ become sceptical of the planning process generally and trust is lost when developers adopt such an approach. If a developer adopts such an approach, as is evident in this case, they should reasonably be responded to by the ‘interest public’ as not worthy of trust.

3. SCOPED OUT MATTERS

- 3.1. This section considers the matters, specified by the developer, to be scoped out of the proposal EIA. The developer seeks to scope out various matters (at chapter 5). These matters include waste, accident, socio-economic, water environment, EMF as well as other issues.
- 3.2. In relation to **waste**, at some point the equipment used in the development (such as solar panels, frames, battery storage, electrical equipment, power cables) will need to be replaced and / or removed on decommissioning. As such all of these items will create waste. Given the size of the development the volume of this waste will be considerable. Accordingly, waste should not be scoped out and the environmental assessment should specify what effect will arise from the disposal of waste of the materials used permanently and in the construction of the Proposal.
- 3.3. In relation **accidents** BESS are known to be hazardous and liable to thermal runaway, resulting in contamination of soils and water courses as well as other pollution effects. Such matters should be scoped into the EIA. Accordingly, accidents should be scoped in.
- 3.4. The **socio-economic** effects of the proposed development are unclear and accordingly cannot be pre-judged as to whether or not the Proposal will have significant effects. Accordingly socio-economic effects should be considered within the EIA.
- 3.5. The scoping report identifies areas of the Site as being subject to some flooding potential. Therefore, the effects of the development on the **water environment** should be considered within the EIA.

3.6. The proposed development includes extensive lengths of high voltage cables which could involve several circuits laid in close proximity linking distributed parts of the dispersed site as well as the Site generally to the national electricity transmission system. It is therefore inevitable that **EMF** will arise. It is also usual for any high voltage power transmission development to include consideration of EMF. The defined cable routing offers considerable uncertainty in relation to receptors. Given the extent, voltage, the likely number of cables and the considerable uncertainty of potentially affected receptors as well as that EMF is more complex where multiple cables are involved, EMF should not be scoped out of the EIA. The EIA should particularly where cables may be located in proximity to sensitive receptors.

4. ALTERNATIVES.

4.1. The developer sets out, at 2.8.3, their expected consideration of alternatives. They note that this will not consider 'no-development' (2.8.4) as an alternative as they consider this to be "*being unreasonable*". Whilst the developer's preference for approval of the development is understandable, it would be major failure of environmental assessment and planning judgement were the outcome of any decision on the proposed development to presume that the project had to be consented and there cannot be no development. Logic dictates that 'no development' is an alternative that the developer has considered.

4.2. In practice the development is not inevitable as there are many alternatives to achieving the claimed or implied benefits of the proposal, presuming that these benefits are required. Delivering Policy objectives can be met by many different ways including alternative technologies, alternative locations and alternative formats for the developer chosen technology (solar and BESS) as well as alternative scales of development. Accordingly, a balanced view of the environmental assessment and the planning judgement in this case would consider the inevitable possibility of no development as an alternative.

5. LANDSCAPE AND VISUAL IMPACTS.

5.1. The developer sets out, at section 12 of their report, their expected consideration of landscape and visual effects arising from the Proposal at this Site. This includes minimal consideration of lighting and the possibility of a Residential Visual Amenity Assessment (RVAA) together with visual effects at "*publicly accessible locations*" (12.7.3).

- 5.2.** Whilst RVAA will be determined based on the extent of the Proposal, given the level of inhabitation in the vicinity of the Proposal it is likely that an RVAA will indeed be required.
- 5.3.** In respect to coverage the Landscape and Visual Impact Assessment (LVIA) generally it should be noted that the Site and the surrounding area are gently undulating. Consequently, the landscape and visual effects are likely to be considerable. Given the extensive inhabitation in the area around the Site the LVIA should not be restricted to 'publicly accessible locations' only. Many private properties and dwelling are like to be affected. Therefore, any LVIA which considers public areas only would fail to address the significant effects of the Proposal and thus fail to meet the necessary standard of LVIA.
- 5.4.** The EIA should fully address the effects of the Proposal at nighttime. This should take account of the security lighting (as well as security fencing) when fully switched on. A 'high-level' approach will not provide sufficient detail to meet the requirement.

6. CUMULATIVE EFFECTS ASESMENT.

- 6.1.** The developer undertakes to prepare a cumulative effects assessment, following appropriate guidance. The Feckenham Parish and surrounding area is being inundated by solar and BESS proposals. Like this Proposal these seek to connect to the Feckenham substation.
- 6.2.** The developer's cumulative assessment should list and consider all solar and BESS, including projects which are for dedicated solar or dedicated BESS project proposals. All of these projects should be included in the developer's cumulative assessment.
- 6.3.** The Cumulative Effects Assessment should take account of EMF as well as other effects such as landscape and visual, heritage, ecology and the cumulative socio-economic effects of the fundamental change this area is undergoing. Whilst the energy transition is important this should not be at the expense of fundamental change to the character and historic value of the area.

7. TRANSMISSION INFRASTRUCTURE CAPACITY IN THE LOCAL REGION.

- 7.1.** As well as identifying and take account of all these other projects the developers cumulative effects assessment the EIA should assess the capacity available at the

Feckenham substation. It is apparent from even simple analysis, that the number of solar and BESS projects, seeking to connect to the Feckenham substation, far exceeds the capacity of the substation and is required in this region. The developer should explicitly assess the substation's capacity and explain how their Proposal fits within this capacity when other projects are taken into account.

- 7.2.** Where the cumulative capacity of all the BESS and solar projects exceeds the Feckenham substation capacity, the EIA should, either: a) explain what scale of development would be required for the substation and the transmission line connection to the substation; and / or, b) explain in comparative terms the balance of effects and benefits arising from their development when compared to all the other projects for the given level of capacities offered. The Proposal developer should seek to show whether or not their Proposal produces greater or lesser effects of the alternative cumulative projects in the area seeking to connect to the substation.

8. CONCLUSION

- 8.1.** The Feckenham Parish Council wish to record their concerns regarding the scale and potential environmental impacts of the Proposal. The Council will await to see the developers EIA before coming to final conclusions on the Proposal. However, as has been set out here it is apparent that the Proposal will produce considerably higher levels of landscape and visual effects, including upon the local residents, because it contains substantial dispersal into many distinct blocks. This unavoidably creates more adverse effects than would arise were the same capacity of solar generation to be concentrated into a single block of land. Consequently, the Proposal appears to be unnecessarily wasteful in creating adverse effects. Feckenham Parish Council expect to see this balance between minimal adverse effects and the Proposal's adverse effects made transparent within the EIA.
- 8.2.** Overall, the Feckenham Parish Council are not encouraged by the developer's approach evident in their Scoping Report. It is not apparent that the effects of the Proposal will be appropriately addressed in the EIA.

CDF
for FPC
April 2026

North West & West Midlands Area Office

Ghyll Mount
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Penrith 40 Business Park
Penrith
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CA11 9BP

Tel: 0300 067 5103

nwwm@forestrycommission.gov.uk

Area Director

Environmental Services, Infrastructure Decisions
& Applications Services
Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough
SL1 4PN

Ref: EN0110033

Date: 17 April 2026

Dear Sir/Madam

Consultation for **Arrow Valley Solar**

Thank you for seeking the Forestry Commission's advice about the impact that this application may have on Ancient Woodland. As a non-statutory consultee, the Forestry Commission is pleased to provide you with the attached information that may be helpful when you consider the application:

- Details of Government Policy relating to ancient woodland
- Information on the importance and designation of ancient woodland

Ancient woodlands are irreplaceable. They have great value because they have a long history of woodland cover, with many features remaining undisturbed. This applies equally to Ancient Semi Natural Woodland (ASNW) and Plantations on Ancient Woodland Sites (PAWS).

It is Government policy to refuse development that will result in the loss or deterioration of irreplaceable habitats including ancient woodland, unless "*there are wholly exceptional reasons, and a suitable compensation strategy exists*" (National Planning Policy Framework paragraph 193).

We also particularly refer you to further technical information set out in Natural England and Forestry Commission's Standing Advice on Ancient Woodland – plus supporting Assessment Guide and Case Decisions.

As a Non-Ministerial Government Department, we provide no opinion supporting or objecting to an application. Rather we are including information on the potential impact that the proposed development would have on the ancient woodland.

Subsequent Enforcement Notices may be materially relevant to planning applications in situations where the site looks to have been cleared prior to a planning application having been submitted or approved.

Weethley Wood, Bush Wood and Poole Wood, Slade Wood, Long Wood, Ladies Wood and Berry Coppice are all ancient woodland sites. For ancient woodlands, any proposal should have a buffer zone of at least 15 metres from the boundary of the woodland to avoid root damage (known as the root protection area). Where possible, a buffer zone should:

- Contribute to wider ecological networks,
- be part of the green infrastructure of the area

A buffer zone should consist of semi-natural habitats such as:

- woodland
- a mix of scrub, grassland, heathland and wetland

Development proposals within a buffer zone should not be approved.

If the planning authority takes the decision to approve this application, we may be able to give further support in developing appropriate conditions in relation to woodland management mitigation or compensation measures. Please note however that the Standing Advice states that *"Ancient woodland, ancient trees and veteran trees are irreplaceable. Consequently, you should not consider proposed compensation measures as part of your assessment of the merits of the development proposal."*

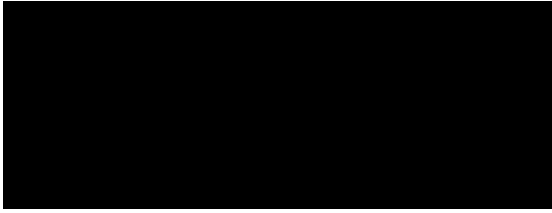
We suggest that you take regard to any points provided by Natural England about the biodiversity of the woodland.

The Town and Country Planning (Consultation) (England) Direction 2024 (published January 2024) requires local planning authorities in England to consult the Secretary of State before granting planning permission for certain types of development, including development that affects ancient woodland: The Town and Country Planning (Consultation) (England) Direction 2024 - GOV.UK (www.gov.uk).

As a result, if impacts cannot be avoided or fully mitigated against, wholly exceptional reasons apply, a suitable compensation strategy exists, and local planning authorities intend to grant planning permission for development that would result in loss or deterioration of ancient woodland, the authority is required to consult the Secretary of State for Housing, Communities and Local Government before granting planning permission.

We hope these comments are helpful to you. If you have any further queries, please do not hesitate to contact me.

Yours sincerely



Area Admin Officer

A summary of Government policy on ancient woodland

Natural Environment and Rural Communities Act 2006 (published October 2006).

Section 40 – “Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity”.

National Planning Policy Framework (published December 2024).

Paragraph 193 – “*development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists*”.

National Planning Practice Guidance – Natural Environment Guidance. (published March 2014)

This Guidance supports the implementation and interpretation of the National Planning Policy Framework. This section outlines the Forestry Commission’s role as a non statutory consultee on “*development proposals that contain or are likely to affect Ancient Semi-Natural woodlands or Plantations on Ancient Woodlands Sites (PAWS) (as defined and recorded in Natural England’s Ancient Woodland Inventory), including proposals where any part of the development site is within 500 metres of an ancient semi-natural woodland or ancient replanted woodland, and where the development would involve erecting new buildings, or extending the footprint of existing buildings*”

It also notes that ancient woodland is an irreplaceable habitat, and that, in planning decisions, **Plantations on Ancient Woodland Sites (PAWS) should be treated equally in terms of the protection afforded to ancient woodland in the National Planning Policy Framework**. It highlights the Ancient Woodland Inventory as a way to find out if a woodland is ancient.

The UK Forestry Standard (5th edition published March 2025).

Page 23: “Areas of woodland are material considerations in the planning process and may be protected in local authority Area Plans. These plans pay particular attention to woods listed on the Ancient Woodland Inventory and areas identified as Sites of Local Nature Conservation Importance (SLNCIs)”.

Keepers of Time – A Statement of Policy for England’s Ancient and Native Woodland (published June 2005).

Page 10 “The existing area of ancient woodland should be maintained and there should be a net increase in the area of native woodland”.

Natural Environment White Paper “The Natural Choice” (published June 2011)

Paragraph 2.53 - This has a “renewed commitment to conserving and restoring ancient woodlands”.

Paragraph 2.56 – “The Government is committed to providing appropriate protection to ancient woodlands and to more restoration of plantations on ancient woodland sites”.

Standing Advice for Ancient Woodland and Veteran Trees (first published October 2014, revised 14 July 2022)

This advice, issued jointly by Natural England and the Forestry Commission, is a material consideration for planning decisions across England. It explains the definition of ancient woodland, its importance, ways to identify it and the policies that are relevant to it.

The Standing Advice refers to an [Assessment Guide](#). This guide sets out a series of questions to help planners assess the impact of the proposed development on the ancient woodland.

[Biodiversity 2020: a strategy for England's wildlife and ecosystem services](#) (published August 2011).

Paragraph 2.16 - Further commitments to protect ancient woodland and to continue restoration of Plantations on Ancient Woodland Sites (PAWS).

Importance and Designation of Ancient and Native Woodland

Ancient Semi Natural Woodland (ASNW)

Woodland composed of mainly native trees and shrubs derived from natural seedfall or coppice rather than from planting, and known to be continuously present on the site since at least AD 1600. Ancient Woodland sites are shown on Natural England's Inventory of Ancient Woodland.

Plantations on Ancient Woodland Site (PAWS)

Woodlands derived from past planting, but on sites known to be continuously wooded in one form or another since at least AD 1600. They can be replanted with conifer and broadleaved trees and can retain ancient woodland features, such as undisturbed soil, ground flora and fungi. Very old PAWS composed of native species can have characteristics of ASNW. Ancient Woodland sites (including PAWS) are on Natural England's Inventory of Ancient Woodland.

Other Semi-Natural Woodland (OSNW)

Woodland which has arisen since AD 1600, is derived from natural seedfall or planting and consists of at least 80% locally native trees and shrubs (i.e., species historically found in England that would arise naturally on the site). Sometimes known as 'recent semi-natural woodland'.

Other woodlands may have developed considerable ecological value, especially if they have been established on cultivated land or been present for many decades.

Information Tools – The Ancient Woodland Inventory

This is described as provisional because new information may become available that shows that woods not on the inventory are likely to be ancient or, occasionally, vice versa. In addition ancient woods less than two hectares or open woodland such as ancient wood-pasture sites were generally not included on the inventories. For more technical detail see [*Natural England's Ancient Woodland Inventory*](#). Inspection may determine that other areas qualify.

As an example of further information becoming available, Wealden District Council, in partnership with the Forestry Commission, Countryside Agency, the Woodland Trust and the High Weald AONB revised the inventory in their district, including areas under 2ha. Some other local authorities have taken this approach.

Further Guidance

Felling Licences - Under the Forestry Act (1967) a Felling Licence is required for felling more than 5 cubic metres per calendar quarter. Failure to obtain a licence may lead to prosecution and the issue of a restocking notice.

Environmental Impact Assessment - Under the Environmental Impact Assessment (Forestry) (England and Wales) Regulations 1999, as amended, deforestation which is likely to have a significant impact on the environment may also require formal consent from the Forestry Commission.



To: Sent via e-mail.

[REDACTED]
Economy, Environment, and Infrastructure
Shire Hall, Westgate Street, Gloucester, GL1 2TG
E-mail: [REDACTED] [@gloucestershire.gov.uk](mailto:[REDACTED]@gloucestershire.gov.uk)
Phone: 01452 [REDACTED]

Our Ref: 2026/03/AVS-EIA/AD

Your Ref:

Date: 24 April 2026

Dear Joseph Jones,

N0110033 Arrow Valley Solar EIA Notification

Thank you for consulting Gloucestershire County Council (GCC) on this matter.

GCC officers have reviewed the consultation materials including the Environmental Impact Assessment (EIA) Scoping Report for the proposed DCO application of Arrow Valley Solar project [N0110033], falling across administrative areas of Wychavon District Council and Redditch Borough Council in Worcestershire, and Stratford-on-Avon District Council in Warwickshire.

To understand additional impact of freight movement on Gloucestershire's Strategic Road Network, officers request to see the Construction Management Plan of the proposed project.

Detailed officer-level comments are as below.

Yours sincerely,

[REDACTED]
Senior Planning Officer
Gloucestershire County Council

DETAILED OFFICER COMMENTS

Ecology

GCC officers have no further comments.

Minerals and Waste Planning

GCC officers have no further comments.

Transport Planning

The A46 Strategic Road Network (SRN) corridor to M5 Junction 9 is recognised as one of Gloucestershire's primary highway infrastructure priorities by the Western Gateway Sub-National Transport Body. The "[M5 Junction 9 and A46 \(Ashchurch\) Transport Scheme](#)" is a priority scheme to address the long-standing traffic issues on the M5 Junction 9 and the A46 (Ashchurch) corridor. It proposes, among other things, to develop a new M5 Junction 9a, to enable new housing and employment in the Tewkesbury and Ashchurch area.

The A46 SRN corridor suffers from high levels of traffic congestion (including heavy goods vehicles) in peak hours and unacceptable journey time delays, resulting in road safety concerns. For this reason, the A46 corridor is recognised as a pinch point by both GCC and National Highways. The adopted [Gloucestershire Local Transport Plan 2020-2041](#) recognises M5 Junction 9 and the A46 corridor in its current form will become a blocker to future growth, particularly related to the Tewkesbury Garden Communities programme and cross boundary development.

GCC officers have concerns regarding the impact of the DCO proposal for Arrow Valley Solar project (NSIP) and the anticipated construction traffic using the A46 corridor. GCC officers would want to have sight of the "Construction Management Plan" for the DCO proposal, to understand the impact of additional long-distance construction freight movement on the A46 corridor between M5 Junction 9 and Gloucestershire's county boundary.

Rishabh Rai

From: [REDACTED]
Sent: 20 April 2026 09:50
To: Arrow Valley Solar
Cc: BConsult
Subject: Fw: BESS - EN0110033 Arrow Valley Solar EIA Notification

You don't often get email from [REDACTED] [Learn why this is important](#)

Good Morning Rishabh

The Service have no comments at this stage with regards the Environmental Statement, but will comment at application stage with regards layout and provision for Fire Safety.

Regards

[REDACTED] (pronoun/pronoun)
MfireE | Technical Fire Safety Inspector | Protection



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From: Arrow Valley Solar <ArrowValleySolar@planninginspectorate.gov.uk>
Sent: 30 March 2026 14:31
Subject: EN0110033 Arrow Valley Solar EIA Notification

Spam

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Dear Sir/Madam

Please see attached correspondence on the proposed Arrow Valley Solar Farm.

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **27 April 2026**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards,



Rishabh Rai (He/Him)
Associate EIA Advisor
Planning Inspectorate

X @PINSgov  [Planning Inspectorate](#)  planninginspectorate.gov.uk

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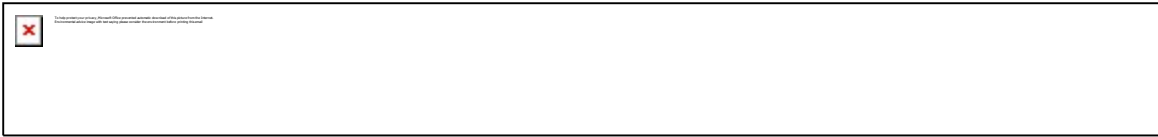
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Historic England

Joseph Jones
Environmental Advisor
Environmental Services
Infrastructure Decisions and Applications Service
Planning Inspectorate
c/o Quadiant
69 Buckingham Avenue
Slough
SL1 4PN

Direct Dial: [REDACTED]
Our ref: PL00801086

27 April 2026

Dear Joseph Jones

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) - Regulations 10 and 11

Application by Arrow Valley Solar Limited (the applicant) for an Order granting Development Consent for the Arrow Valley Solar (the proposed development)

Scoping consultation and notification of the applicant's contact details and duty to make available information to the applicant if requested

Thank you for your letter of the 30 March 2026 seeking our comments on the scoping of the Environment Statement (ES) for the above proposed development.

Historic England has reviewed the information submitted in the applicant's scoping report and associated appendices. We are pleased to note the scoping in of the historic environment (archaeology and built heritage) matters in relation to both construction and operation phases for solar array sites, including BESS and substations and for the construction phase for the cable route corridor. We are broadly content with this scope, the assessment methodology and proposed study area extent.

We offer the following advice to assist in enhancing the robustness of the assessment work to achieve appropriate coverage of the historic environment for the ES and to assist in identifying issues at an early stage to inform design.

The area has a rich and diverse historic environment as demonstrated in the submitted scoping report. There is high potential for new archaeological discoveries as indicated in paragraph 13.3.16, as a result of the assessment work currently underway and that to be undertaken. This may identify new sites of local, regional and national significance. In particular, the location of development within the river valleys of the



THE FOUNDRY 82 GRANVILLE STREET BIRMINGHAM B1 2LH

Telephone 0121 625 6888
HistoricEngland.org.uk

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Arrow and Avon has potential to yield evidence of prehistoric settlement and activity, and the development around the Roman road (Icknield Way) has potential to encounter evidence of Roman settlement.

General Comments

The Archaeology and Solar Farms Good Practice Guide was published on the 16 April 2026 (<https://www.archaeologists.net/news/2026/archaeology-and-solar-farms-good-practice-guide-published>) and the reference in paragraph 13.2.3 should be updated to reflect this.

Comments on Assessment Methodology

The collection of available data and non-intrusive survey methods undertaken as part of this assessment (paragraph 13.4.2 and 13.4.7), should also include a review of LiDAR data and archaeological aerial photograph collections as these can assist in identifying important archaeological sites and features not current designated or recorded on historic environment records (HERs).

We recommend consulting the Forestry Commission map browser (<https://www.forestergis.com/Apps/MapBrowser/>) which includes mapped extents of ridge and furrow from their recent AI work mapping these features. Also Historic England's aerial photo explorer (<https://historicengland.org.uk/images-books/archive/collections/aerial-photos/>), in addition to the review of hard copy aerial photograph collections.

We also recommend that the desk based assessment include a comprehensive analysis of the site's geology and deposit modelling by a suitably qualified and experienced geoarchaeologist. A deposit model will characterise the sequence of deposits and address questions about their archaeological, geoarchaeological and palaeoenvironmental potential and significance and how they may be impacted by the proposed scheme. Preliminary deposit models can be produced from existing information, which may include borehole data from the British Geological Survey, ground investigations and excavation work undertaken to inform the proposal. The model will be particularly useful for understanding the potential for the scheme to encounter deposits which may have Palaeolithic or significant palaeoenvironmental remains. We refer you to the following guidance:

- Curating the Palaeolithic (Historic England, 2023)
- Geoarchaeology (Historic England, 2015)
- Managing Lithic Sites (Historic England, 2024)

Although expected to be light (paragraph 5.7.53), consideration should be given to hydrogeological impacts on archaeological remains, particularly associated with excavation work such as cable route and potential impacts of dewatering on the historic environment.





We welcome the use of multi-spectral imagery to supplement geophysical survey (paragraph 13.4.7). This has a demonstrated potential to provide high-resolution imagery and interpretation of sites beyond those methodologies more regularly employed.

We also welcome reference to additional assessments (paragraph 13.4.15) for the two identified Registered Parks and Gardens, Ragley Hall and Rous Lench within the scheme study area. The scale of the proposal has the potential to cause harm to these heritage assets, particularly in how they are experienced in their immediate settings, but also in wider views that may extend beyond the proposed study area. We therefore welcome early engagement from the applicant to discuss these additional assessments and their need.

The assessment of impacts on registered parks will need to be integrated across both the historic environment and landscape & visual chapters of the ES. We suggest that the written assessment is included in the historic environment chapter, but with reference to the landscape & visual chapter as indicated in the scoping report. Viewpoint locations for the assessment of the registered parks will need to be informed by a Zone of Theoretical Visibility (ZTV) model with locations included to address key views and prospects associated with the park and its approaches, and how the proposed development and the park may be experienced in combination in wider views in the landscape.

Photomontages or visualisations from some locations will assist in understanding and presenting impacts in the ES.

Consideration should be given to landscape mitigation measures embedded within the scheme such as hedge planting or creation of woodland blocks as these can harm historic character by blocking key views or changing the character where openness is a key characteristic. We expect that mitigation measures will be informed by the ES, but early identification will assist in selecting measures that limit harm and we recommend that the measures are tested against local landscape character and heritage significance.

We welcome the consideration of cumulative effects (section 16). We highlight that some heritage assets (receptors) can have relationships with other heritage assets and therefore it is important to consider that cumulative impacts on multiple receptors may be required to appropriately assess impacts from the proposal.

Site specific comments

Based on our initial review of the proposed solar array sites and connecting cable routes we offer some initial observations. This list is not exhaustive and is presented here to assist in identifying some early areas of discussion to minimise the risk of harm to the significance of heritage assets.





- Shurnock Court (Grade II* listed building)

Shurnock Court is located close the northern end of CRC1, this medieval moated manor house sits within a landscape of well-preserved medieval ridge and furrow. Excavation of CRC1 through the ridge and furrow will cause harm to the significance of Shurnock Court and should be avoided.

- Ragley Hall (Grade II* registered park and garden)

Ragley Hall registered park lies to the east of site 1 and to the north of site 2. With the scale of development in its immediate setting the proposal has the potential to harm its significance and we welcome the suggested additional assessment (paragraph 13.4.15) to better understand these impacts at an early stage.

- Rous Lench Court (Grade II* registered park and garden)

Rous Lench Court registered park lies to the west of site 1. With the scale of development in its immediate setting the proposal has the potential to harm its significance and we welcome the suggested additional assessment (paragraph 13.4.15) to better understand these impacts at an early stage.

- Enclosure 3/4 mile (1200m) N of Salford Priors (scheduled monument)

The scheduled monument lies within the southern part of site 2. Areas to the north and west (site 2d) have been subject to sand and gravel extraction and therefore will have limited potential for further evidence of the scheduled monument. Area 2e to the east of the scheduled monument has potential to contain archaeological features that may represent a continuation of the prehistoric settlement activity or its associated land management. Geophysical survey and targeted trial trenching will be important to assess this potential at an early stage.

- Broom Court (Grade II listed building)

Broom Court, a medieval moated manor lies immediately to the east of CRC3. Within the route of CRC3 and immediately west of Broom Court are the well preserved earthwork remains of medieval settlement and associated ridge and furrow field system which contribute to the significance of the listed building. Excavation of CRC3 through these remains will cause harm to the significance of the Broom Court and should be avoided.

- Icknield Street Roman Road

Sections of CRC3, CRC6 and Site 3 lie immediately adjacent to, or in close proximity to the Roman Road. There is potential for evidence of roadside Roman remains that contribute to our understanding of Roman roads and their landscape. Geophysical survey and targeted trial trenching will be important to assess this potential at an early stage.





Historic England

We hope the above comments assist in the preparation of a robust ES that enables the likely significant environmental impacts to be clearly identified and assessed, and inform the flexibility of design to minimise these impacts.

Yours sincerely,



Inspector of Ancient Monuments



@HistoricEngland.org.uk



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HistoricEngland.org.uk

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24th April 2026

The Planning Inspectorate

By email: ArrowValleySolar@planninginspectorate.gov.uk

Arrow Valley Solar — Application Reference EN0110033 — Scoping Consultation Response

Dear Sir/Madam

Honeybourne Parish Council has been identified as a statutory consultee in respect of the above scoping consultation and submits the following comments for the Planning Inspectorate's consideration.

The Council requests that the Environmental Statement addresses the following matters:

1. Construction Traffic and Highway Impact

The Environmental Statement should include a full Construction Traffic Management Plan assessing the routes to be used by HGVs and construction vehicles accessing the solar farm sites and the cable corridor works. The Council requests that the assessment specifically examines the impact on rural roads and narrow lanes in the area, including those in the vicinity of Honeybourne, which may be affected by construction traffic routes to and from the development area. Many of these roads are narrow rural lanes unsuitable for large construction vehicles and the cumulative impact on the local highway network should be fully assessed. The assessment should also consider the cumulative impact of construction traffic alongside the existing significant development activity at Meon Vale and the Long Marston Airfield Garden Village.

2. Underground Cable Corridor

The Environmental Statement should fully assess the construction impact of the underground cable corridor on local roads and highway infrastructure throughout its entire length. The corridor search area shown on the project location map passes through a predominantly rural area and the assessment should identify the specific construction routes proposed, the duration and phasing of works and the impact on local communities along the corridor.

3. Agricultural Land

The Environmental Statement should assess the classification of all agricultural land affected across the full extent of the proposed sites and cable corridor, wherever those sites are ultimately located. The implications of any loss of grade 1 or grade 2 agricultural land should be fully assessed, including any temporary or permanent loss during the construction and operational phases.

4. Landscape and Visual Impact

The Environmental Statement should assess the visual impact of the development on the local landscape, including views from all settlements within the zone of theoretical visibility of the proposed sites and cable corridor. The proximity of the proposed development to the Cotswolds National Landscape should be specifically considered.

5. Ecology and Biodiversity

The Environmental Statement should include a full ecological survey and assessment of the impact on local habitats and biodiversity throughout the site areas and cable corridor, including any effects on protected species and habitats.

6. Cumulative Impact

The Environmental Statement should assess the cumulative impact of this development alongside other consented and proposed major developments in the area, particularly in respect of traffic, landscape and agricultural land.

7. Heritage Assets and Conservation Areas

The Environmental Statement should assess the impact of the proposed development, including the cable corridor, on any designated heritage assets, listed buildings and conservation areas within the zone of influence of the development. The assessment should specifically consider the setting of any such assets and the potential for harm during both the construction and operational phases.

8. Public Rights of Way

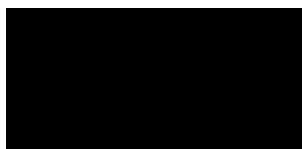
The Environmental Statement should assess the impact of the proposed development, including the cable corridor, on Public Rights of Way in the area. The assessment should identify all affected footpaths, bridleways and other rights of way and assess the potential for temporary or permanent disruption during both the construction and operational phases, together with any proposed mitigation measures.

9. Tourism and Local Economy

The Environmental Statement should assess the impact of the construction phase on tourism and the local economy in the area. Honeybourne is a popular tourist destination supporting a significant level of visitor accommodation and associated facilities which help sustain local services and amenities for the benefit of residents throughout the year. The assessment should consider the potential impact of construction traffic, noise, pollution and disruption to access routes on visitor numbers and the wider local tourist economy, and should identify appropriate mitigation measures to minimise any adverse effects during the construction phase.

The Council reserves the right to make further comments once the full application is submitted.

Yours faithfully



Clerk to Honeybourne Parish Council

Rishabh Rai

From: [REDACTED] <clerk@mickletonparishcouncil.gov.uk>
Sent: 23 April 2026 12:02
To: Arrow Valley Solar
Subject: Re:EN0110033 Arrow Valley Solar EIA Notification

Dear Sir/Madam

Further to your email below, Mickleton Parish Council at its April meeting on 22.04.2026 resolved to state that it has no comments in regard to this application.

Kind regards

[REDACTED]

[REDACTED]

Parish Clerk and Responsible Financial Officer
clerk@mickletonparishcouncil.gov.uk
www.mickletonparishcouncil.gov.uk
01386 430393

From: Arrow Valley Solar <ArrowValleySolar@planninginspectorate.gov.uk>
Date: Mon, 30 Mar 2026 14:35:52 +0100
Subject: EN0110033 Arrow Valley Solar EIA Notification

FAO Parish clerk

Dear Sir/Madam

Please see attached correspondence on the proposed Arrow Valley Solar Farm.

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **27 April 2026**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards

Joseph Jones



The Planning
Inspectorate

Joseph Jones
Environmental Advisor
The Planning Inspectorate

 @PINSgov  The Planning Inspectorate  planninginspectorate.gov.uk

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DPC:76616c646f72

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Customer Connections Site Solutions (CCSS)
Land, Planning and External Affairs (LPEA)
National Grid Electricity Transmission (NGET)
www.nationalgrid.com

SUBMITTED ELECTRONICALLY:
arrowvalleysolar@planninginspectorate.gov.uk

27 April 2026

Dear Sir/Madam

RE: APPLICATION BY ARROW VALLEY SOLAR LIMITED (THE APPLICANT) FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE ARROW VALLEY SOLAR (THE PROPOSED DEVELOPMENT)

SCOPING CONSULTATION RESPONSE

We refer to your letter dated 30th March 2026 in relation to the above proposed application. This is a response on behalf of National Grid Electricity Transmission PLC (NGET).

Having reviewed the scoping report, I would like to make the following comments regarding NGET existing or future infrastructure in close proximity to the current red line boundary.

NGET has high voltage electricity substations and overhead transmission lines within close proximity the scoping area. The overhead lines form an essential part of the electricity transmission network in England and Wales.

Existing Infrastructure

Substation

- Feckenham 400kV S/S
Plus associated underground cables

Overhead Lines

ZF ROUTE 400kV Route

- Circuit 1 FECKENHAM - WALHAM
- Circuit 2 FECKENHAM - MINETY

We enclose a plan showing the location of NGET's apparatus in the scoping area.

In addition, GIS shapefiles of approximate locations of our national electricity transmission network are freely available from here: <https://www.nationalgrid.com/electricity-transmission/network-and->

infrastructure/network-route-maps. You can also check if your works will affect our transmission network by using the Line search website: <https://lsbud.co.uk/>.

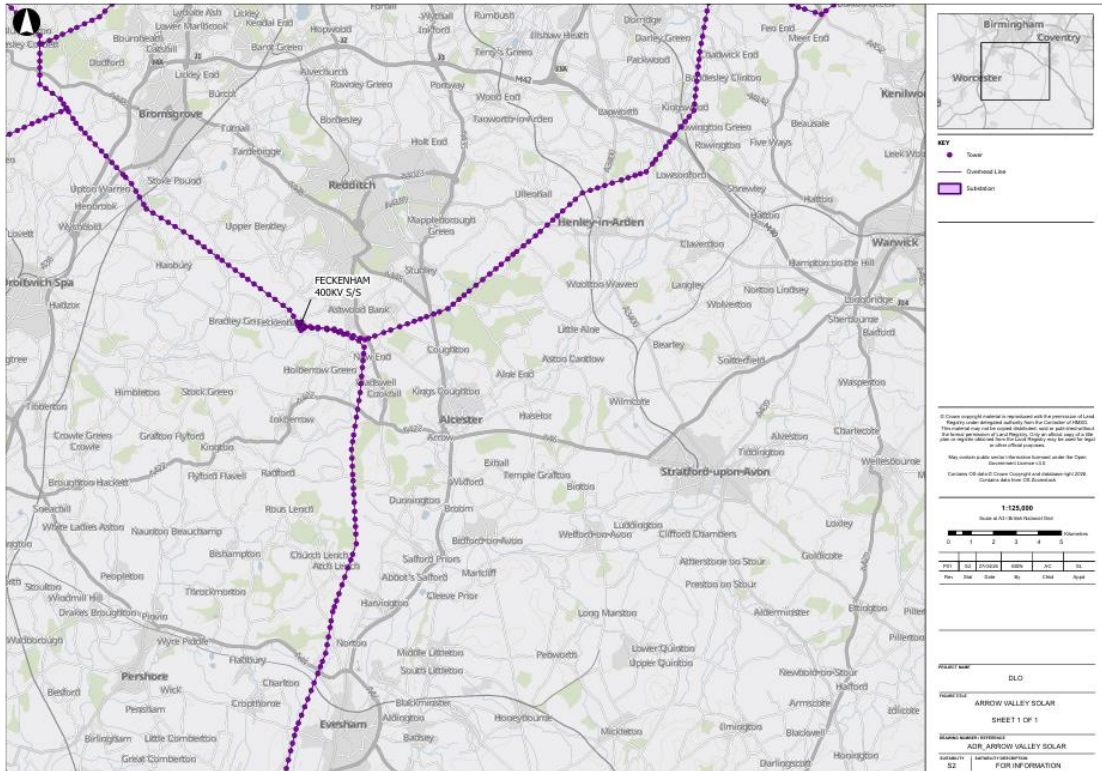


Figure 1: NGET Assets in proposed development area

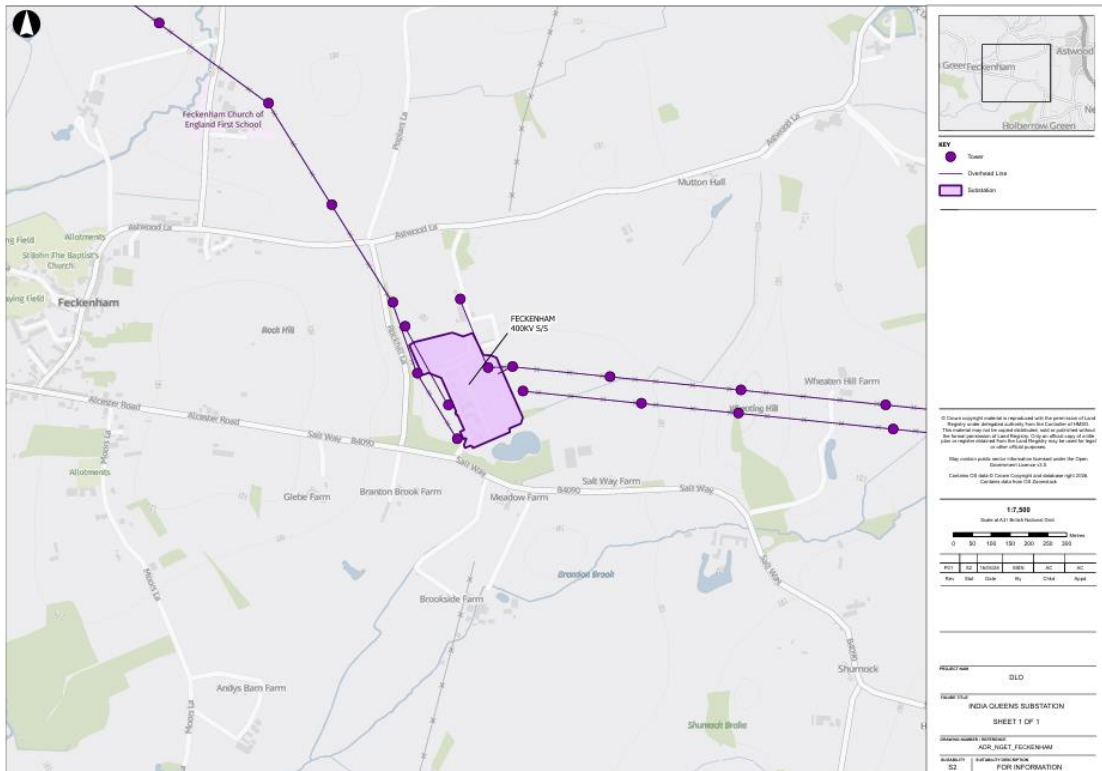


Figure 2: NGET Assets (Feckenham S/S) in proposed development area

New infrastructure

The National Energy System Operator (NESO) took over the electricity network planning responsibility from National Grid Electricity System Operator Limited (NGESO) on the 1st October 2024. Please consult with NESO separately from NGET where further information on the strategic need or capacity is sought.

Please refer to the Holistic Network Design (HND) and the NESO website to view the strategic vision for the UK's ever growing electricity transmission network: <https://www.neso.energy/publications/beyond-2030/holistic-network-design-offshore-wind>; and <https://www.neso.energy/publications/beyond-2030>

It should be noted that there may be further interactions with additional new strategic infrastructure where the projects are in their early development.

NGET requests that all existing and future assets are given due consideration given their criticality to the high-voltage transmission of electricity across the UK. We remain committed to working with the promoter in a proactive manner, enabling both parties to deliver successful projects wherever reasonably possible. As such we encourage that ongoing discussion and consultation between both parties is maintained on interactions with existing or future assets, land interests, connections or consents and any other NGET interests which have the potential to be impacted prior to submission of the Proposed DCO.

The Great Grid Upgrade is the largest overhaul of the electricity grid in generations, we are in the middle of a transformation, with the energy we use increasingly coming from cleaner greener sources. Our infrastructure projects across England and Wales are helping to connect more renewable energy to homes and businesses. To find out more about our current projects please refer to our network and infrastructure webpage. <https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure-projects>. Where it has been identified that your project interacts with or is in close proximity to one of NGET's infrastructure projects, we would welcome further discussion at the earliest opportunity.

These projects are all essential to increase the overall network capability to connect the numerous new offshore wind farms that are being developed, and transport new clean green energy to the homes and businesses where it is needed.

The following points should be taken into consideration.

Specific Comments – Electricity Infrastructure:

- NGET's Overhead Line/s is protected by a Deed of Easement/Wayleave Agreement which provides full right of access to retain, maintain, repair and inspect our asset
- Statutory electrical safety clearances must be maintained at all times. Any proposed buildings must not be closer than 5.3m to the lowest conductor. NGET recommends that no permanent structures are built directly beneath overhead lines. These distances are set out in EN 43 – 8 Technical Specification for "overhead line clearances Issue 5 (2019)".
- If any changes in ground levels are proposed either beneath or in close proximity to our existing overhead lines, then this would serve to reduce the safety clearances for such overhead lines. Safe clearances for existing overhead lines must be maintained in all circumstances.
- The relevant guidance in relation to working safely near to existing overhead lines is contained within the Health and Safety Executive's (www.hse.gov.uk) Guidance Note GS 6 "Avoidance of Danger from Overhead Electric Lines" and all relevant site staff should make sure that they are both aware of and understand this guidance.
- Plant, machinery, equipment, buildings or scaffolding should not encroach within 5.3 metres of any of our high voltage conductors. When those conductors are under their worst conditions of maximum

“sag” and “swing” and overhead line profile (maximum “sag” and “swing”) drawings should be obtained using the contact details above.

- If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.
- Drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations or “pillars of support” of any existing tower. These foundations always extend beyond the base area of the existing tower and foundation (“pillar of support”) drawings can be obtained using the contact details above.
- NGET high voltage underground cables are protected by a Deed of Grant; Easement; Wayleave Agreement or the provisions of the New Roads and Street Works Act. These provisions provide NGET full right of access to retain, maintain, repair and inspect our assets. Hence, we require that no permanent / temporary structures are to be built over our cables or within the easement strip. Any such proposals should be discussed and agreed with NGET prior to any works taking place.
- Ground levels above our cables must not be altered in any way. Any alterations to the depth of our cables will subsequently alter the rating of the circuit and can compromise the reliability, efficiency and safety of our electricity network and requires consultation with National Grid prior to any such changes in both level and construction being implemented.

Further Advice

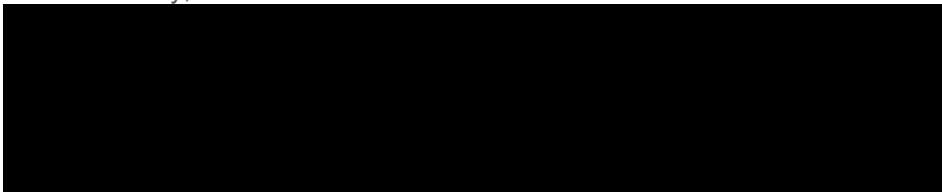
NGET requests to be consulted at the earliest stages to ensure that the most appropriate protective provisions are included within the DCO application to safeguard the integrity of our apparatus and to remove the requirement for objection. All consultations should be sent to the following email address:

box.landandacquisitions@nationalgrid.com

We hope the above information is useful. If you require any further information, please do not hesitate to contact the Land Development Liaison team. In the meantime, we look forward to receipt of further information and consultation relating to potential impacts on our assets.

The information in this letter is provided notwithstanding any discussions taking place in relation to connections with electricity customer services.

Yours faithfully,



Lead Development Liaison Officer
Customer Connections Site Solutions (CCSS)
Land, Planning and External Affairs (LPEA)

Development Liaison Support Officer
Customer Connections Site Solutions (CCSS)
Land, Planning and External Affairs (LPEA)

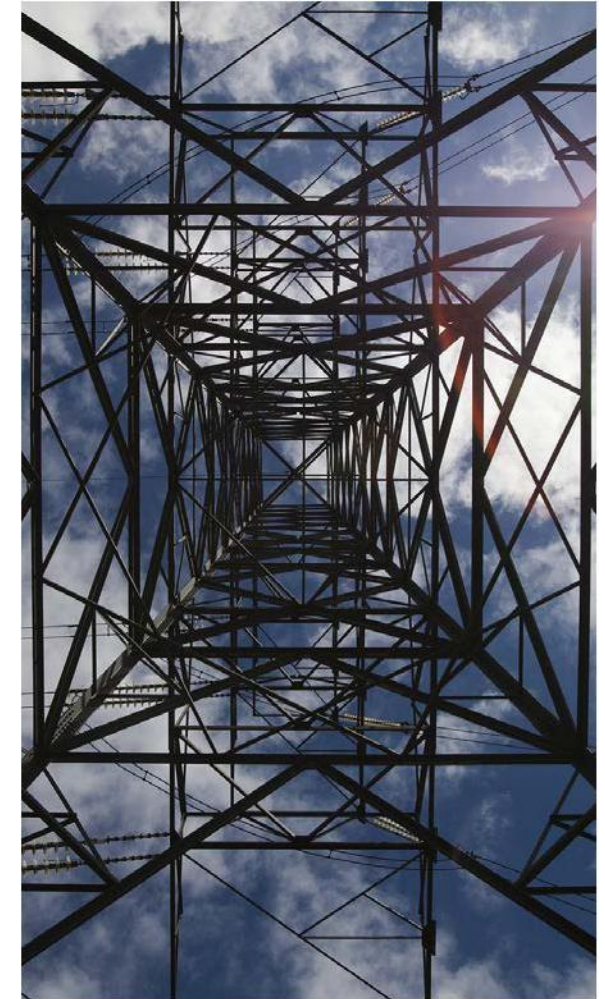
Technical Guidance Note 287

Third-party guidance for working near National Grid Electricity Transmission equipment





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Purpose and scope

The purpose of this document is to give guidance and information to third parties who are proposing, scheduling or designing developments close to National Grid Electricity Transmission assets.

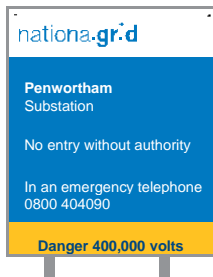
The scope of the report covers information on basic safety and the location of our assets – and also highlights key issues around particular types of development and risk areas.

In the case of electrical assets, National Grid does not authorise or agree safe systems of work with developers and contractors. However, we will advise on issues such as electrical safety clearances and the location of towers and cables. We also work with developers to minimise the impact of any National Grid assets that are nearby.

How to identify specific National Grid sites

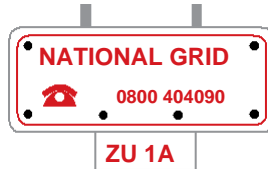
Substations

The name of the Substation and emergency contact number will be on the site sign.



Overhead Lines

The reference number of the tower and the emergency contact number will be on this type of sign.



Contact National Grid

Plant protection

For routine enquiries regarding planned or scheduled works, contact the Asset Protection team online, by email or phone.

www.lsbud.co.uk

Email: assetprotection@nationalgrid.com

Phone: 0800 001 4282

Emergencies

In the event of occurrences such as a cable strike, coming into contact with an overhead line conductor or identifying any hazards or problems with National Grid's equipment, phone our emergency number 0800 404 090 (option 1).

If you have apparatus within 30m of a National Grid asset, please ensure that the emergency number is included in your site's emergency procedures.

Consider safety

Consider the hazards identified in this document when working near electrical equipment



Part 1

Electricity transmission infrastructure

National Grid owns and maintains the high-voltage electricity transmission network in England and Wales (Scotland has its own networks). It's responsible for balancing supply with demand on a minute-by-minute basis across the network.

Overhead lines

Overhead lines consist of two main parts – pylons (also called towers) and conductors (or wires). Pylons are typically steel lattice structures mounted on concrete foundations. A pylon's design can vary due to factors such as voltage, conductor type and the strength of structure required.

Conductors, which are the 'live' part of the overhead line, hang from pylons on insulators. Conductors come in several different designs depending on the amount of power that is transmitted on the circuit.

In addition to the two main components, some Overhead Line Routes carry a Fibre Optic cable between the towers with an final underground connection to the Substations.

In most cases, National Grid's overhead lines operate at 275kV or 400kV.

Underground cables

Underground cables are a growing feature of National Grid's network. They consist of a conducting core surrounded by layers of insulation and armour. Cables can be laid in the road, across open land or in tunnels. They operate at a range of voltages, up to 400kV.

Substations

Substations are found at points on the network where circuits come together or where a rise or fall in voltage is required. Transmission substations tend to be large facilities containing equipment such as power transformers, circuit breakers, reactors and capacitors. In addition Diesel generators and compressed air systems can be located there.

Part 2

Statutory requirements for working near high-voltage electricity

The legal framework that regulates electrical safety in the UK is *The Electricity Safety, Quality and Continuity Regulations (ESQCR) 2002*. This also details the minimum electrical safety clearances, which are used as a basis for the Energy Networks Association (ENA) TS 43-8. These standards have been agreed by CENELEC (European Committee for Electrotechnical Standardisation) and also form part of the *British Standard BS EN 50341-1:2012 Overhead Electrical Lines exceeding AC 1kV*. All electricity companies are bound by these rules, standards and technical specifications. They are required to uphold them by their operator's licence.

Electrical safety clearances

It is essential that a safe distance is kept between the exposed conductors and people and objects when working near National Grid's electrical assets. A person does not have to touch an exposed conductor to get a life-threatening

electric shock. At the voltages National Grid operates at, it is possible for electricity to jump up to several metres from an exposed conductor and kill or cause serious injury to anyone who is nearby. For this reason, there are several legal requirements and safety standards that must be met.

Any breach of legal safety clearances will be enforced in the courts. This can and has resulted in the removal of an infringement, which is normally at the cost of the developer or whoever caused it to be there. Breaching safety clearances, even temporarily, risks a serious incident that could cause serious injury or death.

National Grid will, on request, advise planning authorities, developers or third parties on any safety clearances and associated issues. We can supply detailed drawings of all our overhead line assets marked up with relevant safe areas.



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Your Responsibilities - Overhead lines

Work which takes place near overhead power lines carries a significant risk of coming into proximity with the wires. If any person, object or material gets too close to the wires, electricity could 'flashover' and be conducted to earth, causing death or serious injury. You do not need to touch the wires for this to happen. The law requires that work is carried out in close proximity to live overhead power lines only when there is no alternative, and only when the risks are acceptable and can be properly controlled. Statutory clearances exist which must be maintained, as prescribed by the Electricity Safety, Quality and Continuity Regulations 2002.

Under the Health and Safety at Work etc. Act 1974 and Management of Health and Safety at Work Regulations 1999, you are responsible for preparing a suitable and sufficient risk assessment and safe systems of work, to ensure that risks are managed properly and the safety of your workforce and others is maintained. Your risk assessment must consider and manage all of the significant risks and put in place suitable precautions/controls in order to manage the work safely. You are also responsible for ensuring that the precautions identified are properly implemented and stay in place throughout the work.

Work near overhead power lines must always be conducted in accordance with GS6, 'avoiding danger from overhead power lines', and any legislation which is relevant to the work you are completing.

What National Grid will provide

National Grid can supply profile drawings in PDF and CAD format showing tower locations and relevant clearances to assist you in the risk assessment process.

What National Grid will not provide

National Grid will not approve safe systems of work or approve design proposals

Part 3

What National Grid will do for you and your development

Provision of information

National Grid should be notified during the planning stage of any works or developments taking place near our electrical assets, ideally a minimum notification period of 8 weeks to allow National Grid to provide the following services:

Drawings

National Grid will provide relevant drawings of overhead lines or underground cables to make sure the presence and location of our services are known. Once a third party or developer has contacted us, we will supply the drawings for free.

400kV

The maximum nominal voltage of the underground cables in National Grid's network

Risk or impact identification

National Grid can help identify any hazards or risks that the presence of our assets might bring to any works or developments. This includes both the risk to safety from high-voltage electricity and longer-term issues, such as induced currents, noise and maintenance access that may affect the outcome of the development. National Grid will not authorise specific working procedures, but we can provide advice on best practice.





Risks or hazards to be aware of

This section includes a brief description of some of the hazards and issues that a third party or developer might face when working or developing close to our electrical infrastructure.

Land and access

National Grid has land rights in place with landowners and occupiers, which cover our existing overhead lines and underground cable network. These agreements, together with legislation set out under the *Electricity Act 1989*, allow us to access our assets to maintain, repair and renew them. The agreements also lay down restrictions and covenants to protect the integrity of our assets and meet safety regulations. Anyone proposing a development close to our assets should carefully examine these agreements.

Our agreements often affect land both inside and outside the immediate vicinity of an asset. Rights will include the provision of access, along with restrictions that ban the development of land through building, changing levels, planting and other operations. Anyone looking to develop close to our assets must consult with National Grid first.

For further information, contact Asset Protection:

Email: assetprotection@nationalgrid.com
Phone: 0800 001 4282

Electrical clearance from overhead lines

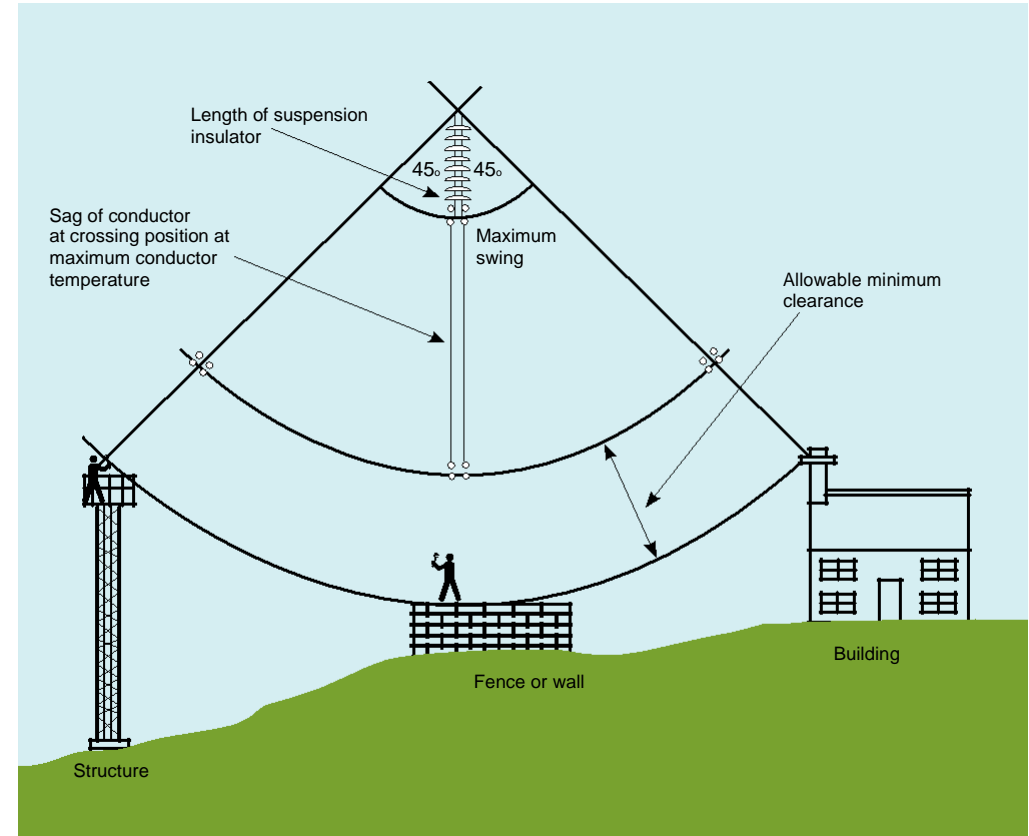
The clearance distances referred to in this section are specific to 400kV overhead lines. National Grid can advise on the distances required around different voltages i.e. 132kV and 275kV.

As we explained earlier, *Electrical Networks Association TS 43-8* details the legal clearances to our overhead lines. The minimum clearance between the conductors of an overhead line and the ground is 7.3m at maximum sag. The sag is the vertical distance between the wire's highest and lowest point. Certain conditions, such as power flow, wind speed and air temperature can cause conductors to move and allowances should be made for this.

The required clearance from the point where a person can stand to the conductors is 5.3m. To be clear, this means there should be at least 5.3m from where someone could stand on any structure (i.e. mobile and construction equipment) to the conductors. Available clearances will be assessed by National Grid on an individual basis.

National Grid expects third parties to implement a safe system of work whenever they are near Overhead Lines.

Diagram not to scale



There should be at least 5.3m between the conductors and any structure someone could stand on

We recommend that guidance such as *HSE Guidance Note GS6 (Avoiding Danger from Overhead Power Lines)* is followed, which provides advice on how to avoid danger from all overhead lines, at all voltages. If you are carrying out work near overhead lines you must contact National Grid, who will provide the relevant profile drawings.

7.3m

The required minimum clearance between the conductors of an overhead line, at maximum sag, and the ground

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The undergrounding of electricity cables at Ross-on-Wye

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Underground cables Underground cables operating at up to 400kV are a significant part of the National Grid Electricity Transmission network. When your works will involve any ground disturbance it is expected that a safe system of work is put in place and that you follow guidance such as *HSG 47 (Avoiding Danger from Underground Services)*.

You must contact National Grid to find out if there are any underground cables near your proposed works. If there are, we will provide cable profiles and location drawings and, if required, on-site supervision of the works. Cables can be laid under roads or across industrial or agricultural land. They can even be layed in canal towpaths and other areas that you would not expect.

Cables crossing any National Grid high-voltage (HV) cables directly buried in the ground are required to maintain a minimum separation that will be determined by National Grid on a case-by-case basis. National Grid will need to do a rating study on the existing cable to work out if there are any adverse effects on either cable rating. We will only allow a cable to cross such an area once we know the results of the re-rating. As a result, the clearance distance may need to be increased or alternative methods of crossing found.

For other cables and services crossing the path of our HV cables, National Grid will need confirmation that published standards and clearances are met.

Impressed voltage

Any conducting materials installed near high-voltage equipment could be raised to an elevated voltage compared to the local earth, even when there is no direct contact with the high-voltage equipment. These impressed voltages are caused by inductive or capacitive coupling between the high-voltage equipment and nearby conducting materials and can occur at distances of several metres away from the

equipment. Impressed voltages may damage your equipment and could potentially injure people and animals, depending on their severity. Third parties should take impressed voltages into account during the early stages and initial design of any development, ensuring that all structures and equipment are adequately earthed at all times.

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Earth potential rise

Under certain system fault conditions – and during lightning storms – a rise in the earth potential from the base of an overhead line tower or substation is possible. This is a rare phenomenon that occurs when large amounts of electricity enter the earth. This can pose a serious hazard to people or equipment that are close by.

We advise that developments and works are not carried out close to our tower bases, particularly during lightning storms.

Noise

Noise is a by-product of National Grid's operations and is carefully assessed during the planning and construction of any of our equipment. Developers should consider the noise emitted from National Grid's sites or overhead lines when planning any developments, particularly housing. Low-frequency hum from substations can, in some circumstances, be heard up to 1km or more from the site, so it is essential that developers find adequate solutions for this in their design. Further information about likely noise levels can be provided by National Grid.

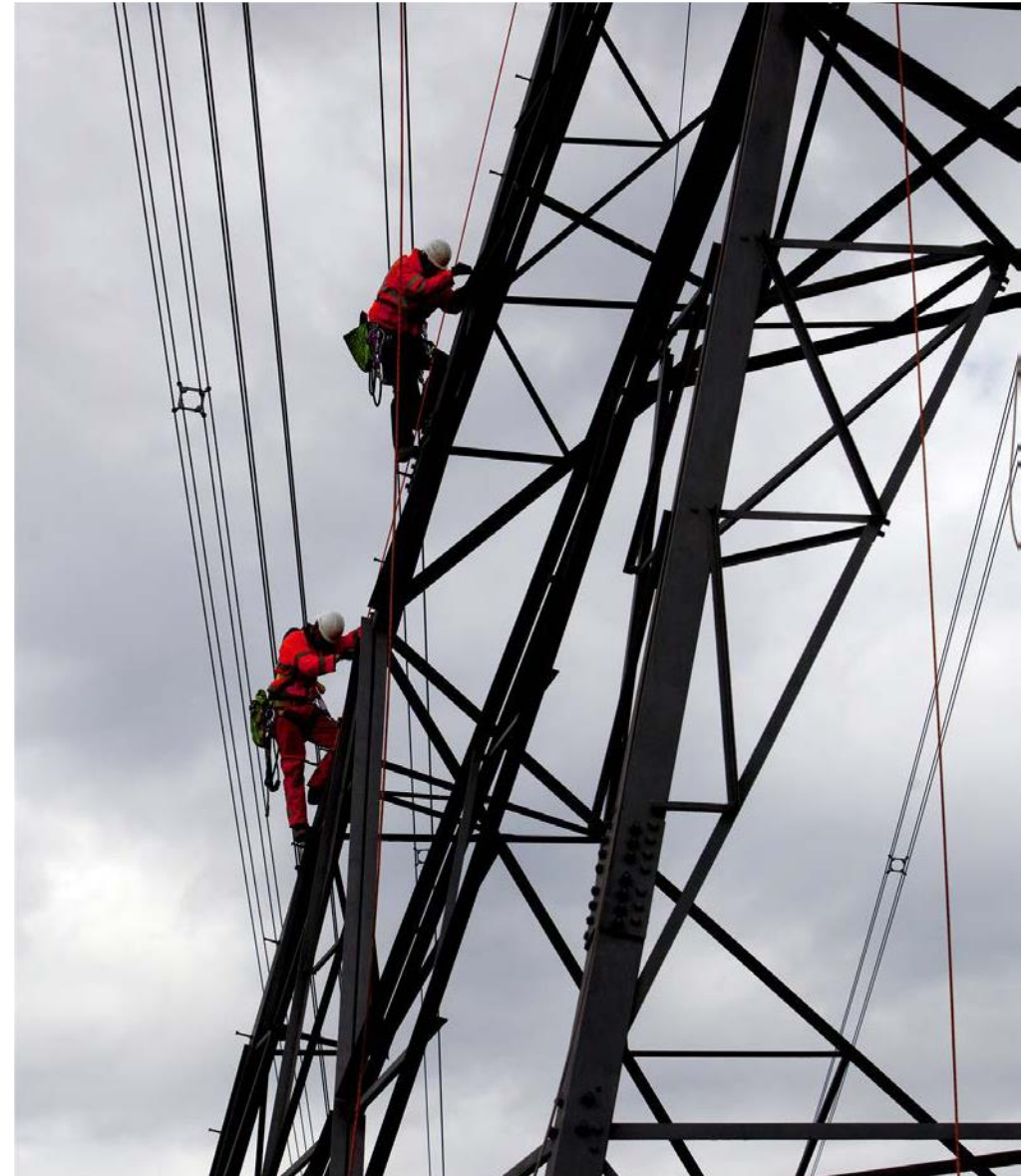
Maintenance access

National Grid needs to have safe access for vehicles around its assets and work that restricts this will not be allowed. In terms of our overhead lines, we wouldn't want to see any excavations made, or permanent structures built, that might affect the foundations of our towers. The size of the foundations around a tower base depends on the type of tower that is built there. If you wish to carry out works within 30m of the tower base, contact National Grid for more information. Our business has to maintain access routes to tower bases with land owners. For that reason, a route wide enough for an HGV must be permanently available. We may need to access our sites, towers, conductors and underground cables at short notice.

30m

If you wish to carry out work within this distance of the tower base, you must contact National Grid for more information

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Fires and firefighting

National Grid does not recommend that any type of flammable material is stored under overhead lines. Developers should be aware that in certain cases the local fire authority will not use water hoses to put out a fire if there are live, high-voltage conductors within 30m of the seat of the fire (as outlined in ENA TS 43-8).

In these situations, National Grid would have to be notified and reconfigure the system – to allow staff to switch out the overhead line – before any firefighting could take place. This could take several hours.

We recommend that any site which has a specific hazard relating to fire or flammable material should include National Grid's emergency contact details (found at the beginning and end of this document) in its fire plan information, so any incidents can be reported.

Developers should also make sure their insurance cover takes into account the challenge of putting out fires near our overhead lines.

Excavations, piling or tunnelling

You must inform National Grid of any works that have the potential to disturb the foundations of our substations or overhead line towers. This will have to be assessed by National Grid engineers before any work begins.

BS ISO 4866:2010 states that a minimum distance of 200m should be maintained when carrying out quarry blasting near our assets. However, this can be reduced with specific site surveys and changes to the maximum instantaneous charge (the amount of explosive detonated at a particular time).

All activities should observe guidance layed out in *BS 5228-2:2009*.

Microshocks

High-voltage overhead power lines produce an electric field. Any person or object inside this field that isn't earthed picks up an electrical charge. When two conducting objects – one that is grounded and one that isn't – touch, the charge can equalise and cause a small shock, known as a microshock. While they are not harmful, they can be disturbing for the person or animal that suffers the shock.

For these reasons, metal-framed and metal-clad buildings which are close to existing overhead lines should be earthed to minimise the risk of microshocks. Anything that isn't earthed, is conductive and sits close to the lines is likely to pick up a charge. Items such as deer fences, metal palisade fencing, chain-link fences and metal gates underneath overhead lines all need to be earthed.

For further information on microshocks please visit www.emfs.info.



200m

The minimum distance that should be maintained from National Grid assets when quarry blasting



Specific development guidance

Wind farms

National Grid's policy towards wind farm development is closely connected to the *Electricity Networks Association Engineering Recommendation L44 Separation between Wind Turbines and Overhead Lines, Principles of Good Practice*. The advice is based on national guidelines and global research. It may be adjusted to suit specific local applications.

There are two main criteria in the document:

- (i) The turbine shall be far enough away to avoid the possibility of toppling onto the overhead line
- (ii) The turbine shall be far enough away to avoid damage to the overhead line from downward wake effects, also known as turbulence

The toppling distance is the minimum horizontal distance between the worst-case pivot point of the wind turbine and the conductors hanging in still air. It is the greater of:

- the tip height of the turbine plus 10%
- or, the tip height of the turbine plus the electrical safety distance that applies to the voltage of the overhead line.

To minimise the downward wake effect on an overhead line, the wind turbine should be three times the rotor distance away from the centre of the overhead line.

Wake effects can prematurely age conductors and fittings, significantly reducing the life of the asset. For that reason, careful consideration should be taken if a wind turbine needs to be sited within the above limits. Agreement from National Grid will be required.

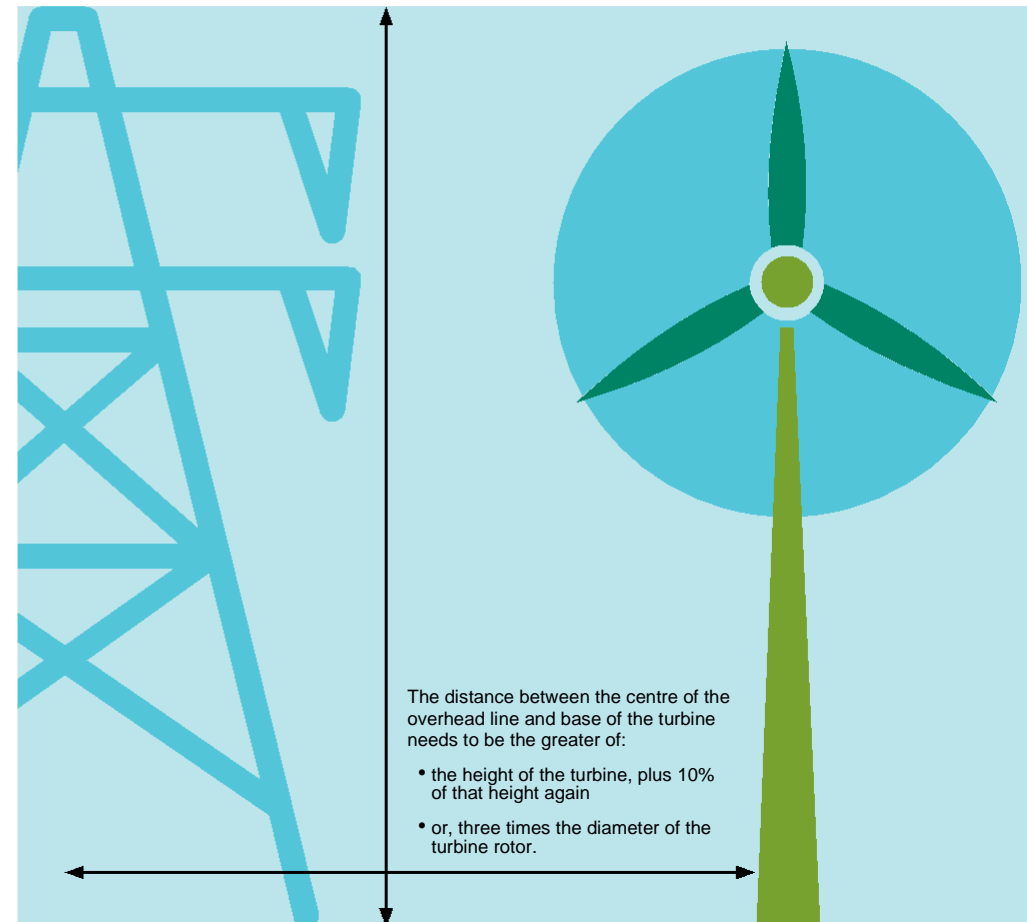
Commercial and housing developments

National Grid has developed a document called *Design guidelines for development near pylons and HVO power lines*, which gives advice to anyone involved in planning or designing large-scale developments that are crossed by, or close to, overhead lines.

The document focuses on existing 275kV and 400kV overhead lines on steel lattice towers, but can equally apply to 132kV and below. The document explains how to design large-scale developments close to high-voltage lines, while respecting clearances and the development's visual and environmental impact.

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Diagram not to scale



Turbines should be far enough away to avoid the possibility of toppling onto the overhead line



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The advice is intended for developers, designers, landowners, local authorities and communities, but is not limited to those organisations.

Overall, developers should be aware of all the hazards and issues relating to the electrical equipment that we have discussed when designing new housing.

As we explored earlier, National Grid's assets have the potential to create noise. This can be low frequency and tonal, which makes it quite noticeable. It is the responsibility of developers to take this into account during the design stage and find an appropriate solution.

Solar farms

While there is limited research and recommendations available, there are several key factors to consider when designing Solar Farms in the vicinity of Overhead Power Lines.

Developers may be looking to build on arable land close to National Grid's assets. In keeping with the safety clearance limits that we outlined earlier for solar panels directly underneath overhead line conductors, the highest point on the solar panels must be no more than 5.3m from the lowest conductors.

This means that the maximum height of any structure will need to be determined to make sure safety clearance limits aren't breached. This could be as low as 2m. National Grid will supply profile drawings to aid the planning of solar farms and determine the maximum height of panels and equipment.

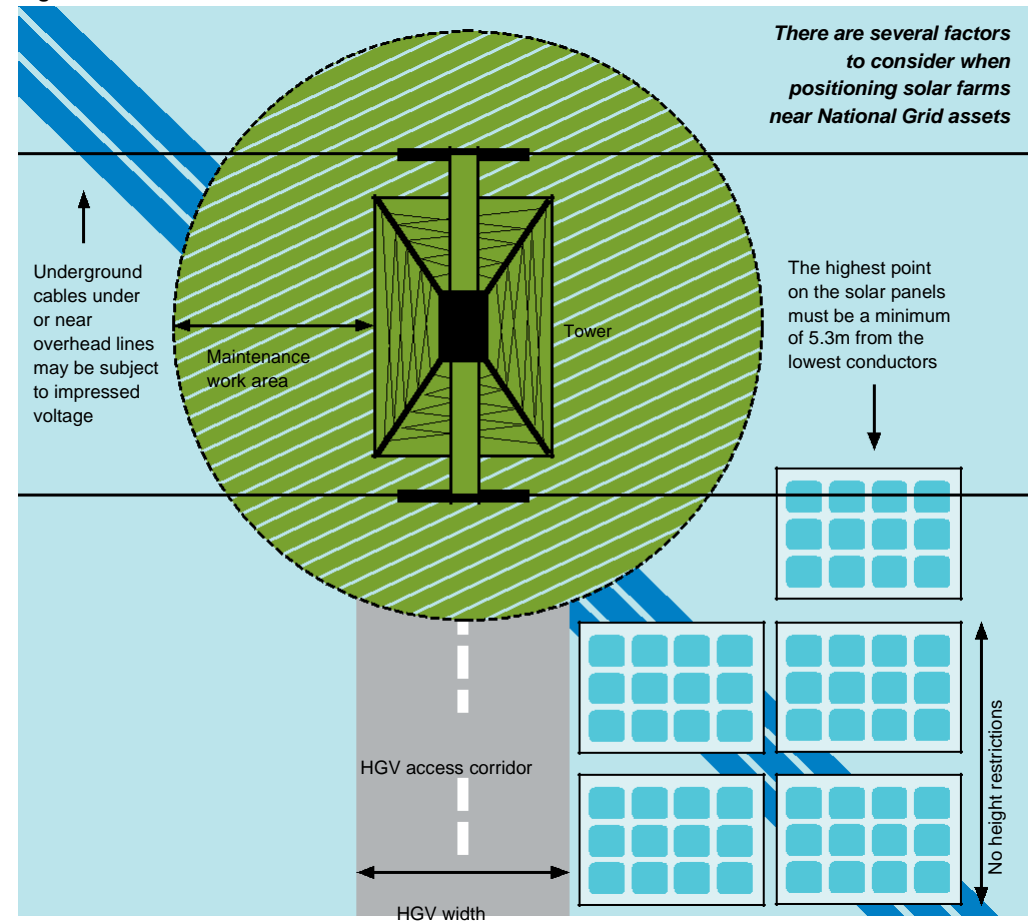
Solar panels that are directly underneath power lines risk being damaged on the rare occasion that a conductor or fitting falls to the ground. A more likely risk is ice falling from conductors or towers in winter and damaging solar panels.

There is also a risk of damage during adverse weather conditions, such as lightning storms, and system faults. As all our towers are earthed, a weather event such as lightning can cause a rise in the earth potential around the base of a tower. Solar panel support structures and supply cables should be adequately earthed and bonded together to minimise the effects of this temporary rise in earth potential.

Any metallic fencing that is located under an overhead line will pick up an electrical charge. For this reason, it will need to be adequately earthed to minimise microshocks to the public.

For normal, routine maintenance and in an emergency National Grid requires unrestricted access to its assets. So if a tower is enclosed in a solar farm compound, we will need full access for our vehicles,

Diagram not to scale



Including access through any compound gates. During maintenance – and especially re-conductoring – National Grid would need enough space near our towers for winches and cable drums. If enough space is not available, we would require solar panels to be temporarily removed.



Asset protection agreements

In some cases, where there is a risk that development will impact on National Grid's assets, we will insist on an asset protection agreement being put in place. The cost of this will be the responsibility of the developer or third party.

Contact details

Emergency situations

If you spot a potential hazard on or near an overhead electricity line, do not approach it, even at ground level. Keep as far away as possible and follow the six steps below:

- Warn anyone close by to evacuate the area
- Call our 24-hour electricity emergency number: 0800 404 090 (Option 1)¹
- Give your name and contact phone number
- Explain the nature of the issue or hazard
- Give as much information as possible so we can identify the location – i.e. the name of the town or village, numbers of nearby roads, postcode and (ONLY if it can be observed without putting you or others in danger) the tower number of an adjacent pylon
- Await further contact from a National Grid engineer

¹ It is critically important that you don't use this phone number for any other purpose. If you need to contact National Grid for another reason please use our Contact Centre at www2.nationalgrid.com/contact-us to find the appropriate information or call 0800 0014282.

Routine enquiries

Email:
assetprotection@nationalgrid.com

Call Asset Protection on:
0800 0014282

Opening hours:
Monday to Friday 08:00-16:00

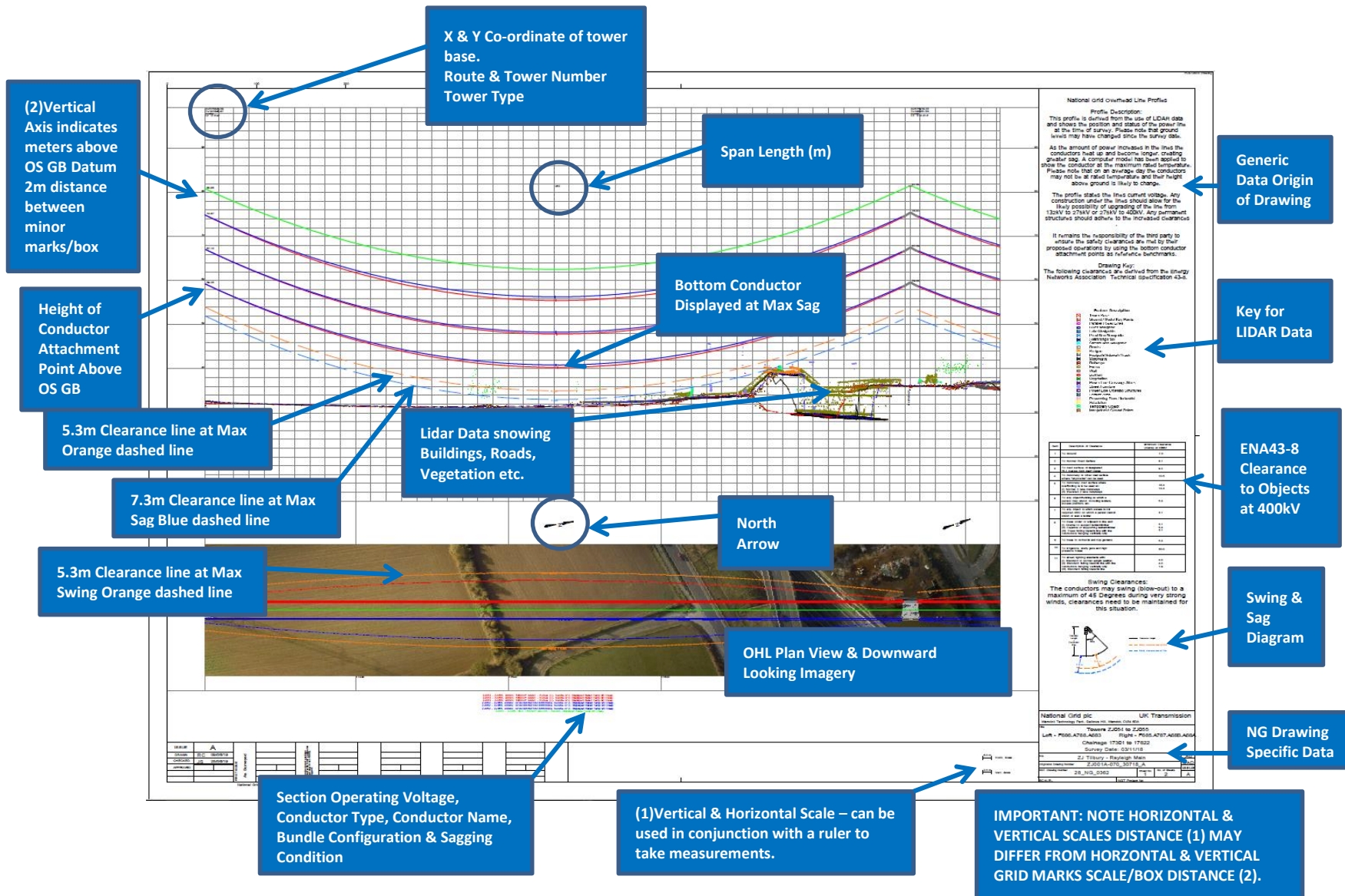
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14 APPENDIX A

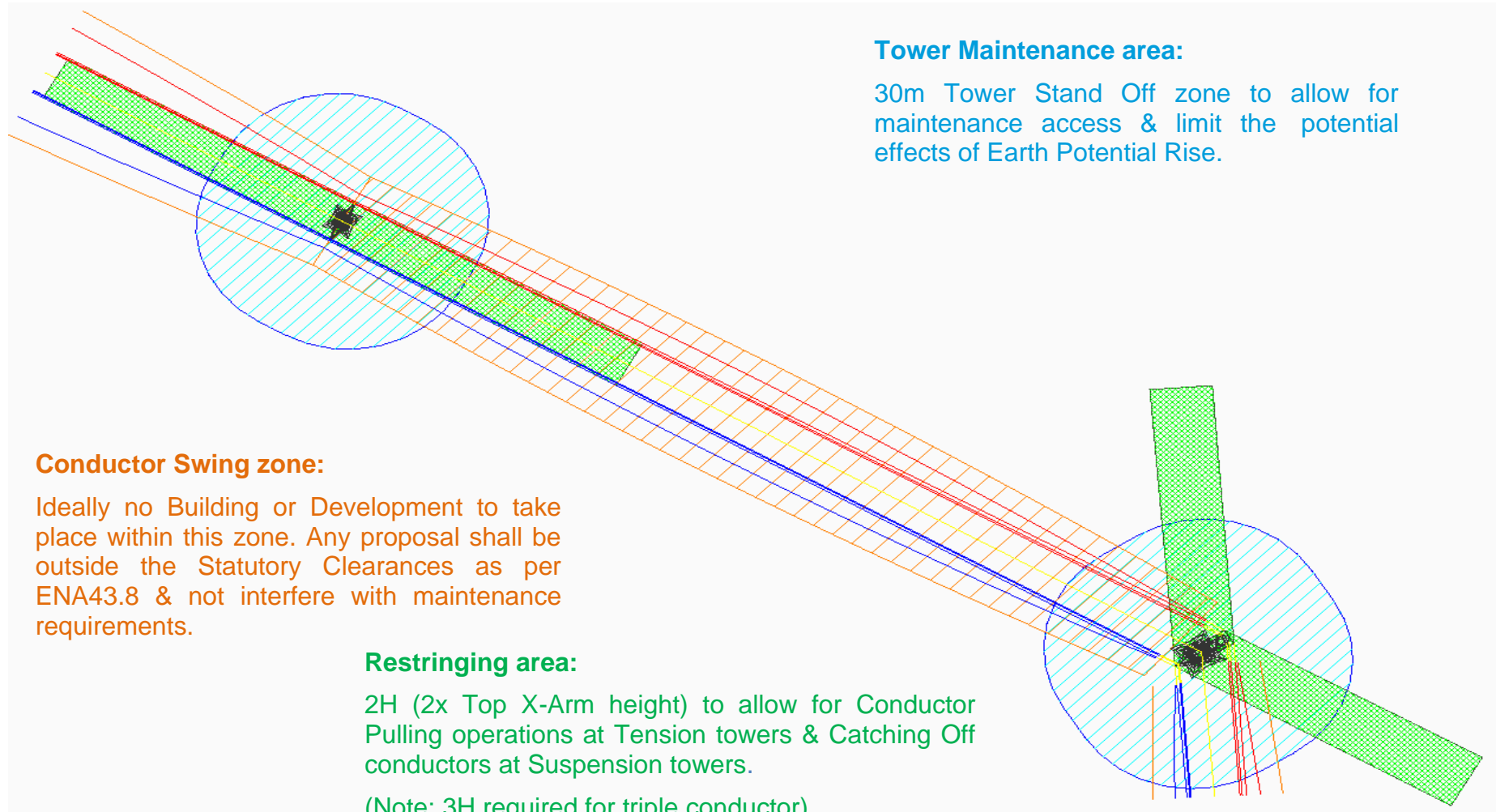


OHL Profile Drawing Guide





OHL Tower Stand Off & Reconducting Area



Our ref: NH/26/15819
Your ref: EN0110033

Planning Inspectorate

Assistant Spatial Planner
3 Snowhill
Snow Hill Queensway
Birmingham
B4 6GA

22nd April 2026

Via email: ArrowValleySolar@planninginspectorate.gov.uk

Dear Sir or Madam,

EIA Scoping Opinion – Arrow valley solar farm

Thank you for providing National Highways with the opportunity to respond on the Environmental Impact Assessment (EIA) scoping request for Arrow Valley Solar Farm.

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth.

In responding to sustainable development consultations, we have regard to DfT Circular 01/2022: The Strategic Road Network and the Delivery of Sustainable Development ('the Circular'). This sets out how interactions with the Strategic Road Network should be considered in the making of local plans and development management proposals. In addition to the Circular, the response set out below is also in accordance with the National Planning Policy Framework (NPPF) and other relevant policies.

In relation to this consultation, our principal interest is in safeguarding the A46 which shares a boundary with the site.

We note that this consultation is in accordance with Regulations 10 and 11 and is the first pre-application consultation being undertaken to inform a subsequent Development Consent Order (DCO) application. It is understood that a DCO submission is necessary as the proposal is considered to be a Nationally Significant Infrastructure Project (NSIP) given the site's energy output is expected to exceed 50 Megawatts.

In relation to this Stage One consultation, National Highways has reviewed the submitted Scoping Report (dated March 2026). We understand from this that the Planning Inspectorate has identified National Highways as a consultation body which must be

consulted prior to adopting its Scoping Opinion and developing a subsequent Environmental Statement.

The below sets out our initial review of this proposal and the further information that we will require to fully consider the proposal's impact on our network:

National Highways' Considerations

Site Access

The A46 goes through several of the Site 2 sub sites. The scoping report states that the A46 will act as the access corridor for construction traffic travelling between the site and the wider network. The SRN in this section is subject to the national speed limit.

At this point proposed temporary, permanent, or maintenance access has not been established. It is noted that this will be provided in the transport and access section once the analysis has been completed. National Highways will need to understand the access strategy as it is understood the A46 will act as the primary route for traffic accessing the site. As per DfT Circular (01/22) new accesses from motorways and other high-speed sections of the SRN will not be permitted.

Traffic impacts

The transport and access assessment will provide details of the flows that will be generated by the scheme at the construction, operational and decommissioning phases. Detailed analysis will identify where potential traffic and transport impacts may occur which will identify constraints on the network and inform the access for construction.

The trip generation and assignment for the operational and construction phases has not been confirmed.

Operational – Traffic Impacts

It is anticipated that traffic and transport impacts of the operational, maintenance and decommissioning phases will be lower than at the construction phase.

However, the likely traffic and transport impacts of the operational site should still be set out and clearly evidenced in a Transport Assessment.

Construction - Traffic Impacts

National Highways will require information on the number of HGVs that will be travelling on the SRN to transport materials and equipment to the site. We also require an understanding of what route these vehicles will take to the site as well as the time of day they will likely be arriving and leaving.

Information regarding the access and exit routes and arrival/departure times of workers during the construction period should also be provided to enable sufficient management of construction traffic and to minimise impacts on the SRN.

National Highways will need to agree any proposed signage to be located within the Strategic Road Network.

Recommended Transport Assessment

In light of the above comments, we would expect any formal planning submission to be accompanied by a Transport Assessment prepared in accordance with Planning Practice Guidance on Travel Plans, Transport Assessments and Statements (March, 2014). In addition, due to the proximity of the site to the SRN, the Transport Assessment should be produced in accordance with DfT Circular 01/2022: The Strategic Road Network and the Delivery of Sustainable Development.

We suggest that the Transport Assessment include the following:

- Development proposal details– information about the scale of the proposed development (and its construction) including any phasing, parking, access points, hours/days of operation, timescales for the construction period, and anticipated year of opening.
- Trip generation – information about the anticipated levels of traffic the development would generate. This should include the predicted maximum hourly breakdown of staff commuting trips, and HGV/delivery trip generation for the operational and construction phases.
- Trip assignment – information about traffic routings (for construction and operational phases) in relation to the SRN.
- Depending on the scale and distribution of new trips, it may also be necessary to indicate how traffic associated with the development proposal will impact on the SRN in the peak hours. These impacts should be considered for the site both as a standalone operation, and cumulatively with other nearby solar farm applications, (plus any wider committed developments), to consider whether the development will result in material implications for SRN junctions.
- Where further assessments are deemed necessary these should be carried out for the proposed opening year of the development (or where applicable, the start of construction).

It may be beneficial for the above assessment work to be agreed in a staged approach with the first stage being to agree the trip generation and trip distribution. This will determine if any further assessments with respect of the SRN are required.

In addition to a Transport Assessment, National Highways should also be consulted on a Construction Traffic Management Plan (CTMP). This should set out how the environmental impacts of construction traffic will be minimised and mitigated.

Boundary Matters

It is noted that the site shares a boundary with the SRN, therefore there may be physical impacts to our network.

As the Site shares a common boundary with our network, there could be some potential boundary related matters which will require further consideration by ourselves. The key areas are outlined below:

Underground works

Any proposed directional drilling under our network will require compliance with The Design Manual for Roads and Bridges (DMRB) Chapter CD622 (Managing Geotechnical Risk). In addition to any relevant licences to be obtained under the Highways Act 1980.

It should be noted that National Highways do not allow the Compulsory Acquisition of land beneath the SRN and the implications of this may need to be considered.

Drainage

Drainage proposals will be of particular interest to National Highways to ensure that surface water run-off from the site does not threaten the integrity of National Highways drainage assets. As set out in Paragraph 59 of DfT Circular 01/2022, National Highways will not accept any water run-off arising from any change of use into our highway drainage systems, or any new connections into those systems from third party development drainage systems. We should therefore be consulted on a surface water drainage strategy for the site to understand the proposal for managing the site's drainage. In addition, prior to the commencement of the development, we should be consulted on a detailed drainage scheme to be designed in accordance with the agreed drainage strategy.

Buildings and Structures

Buildings and structures should be positioned at a sufficient distance from our network so as not to cause a concern for National Highways. Any buildings or structures that are within the 'fall distance' of National Highways network will need structural approval from National Highways and we should be consulted on building design and materials.

Boundary Treatments and Landscaping

National Highways should be consulted on a boundary treatment and landscaping plan which should clearly set out any proposed boundary treatments and landscaping work near to our network. The distance of proposals (in metres) from our network should be clearly identified. All boundary treatments and landscaping should be positioned entirely within the red line boundary of the site and far enough within the site that it can be installed and maintained without encroachment onto National Highways land. This

applies to fences and all vegetation for the duration of their life. If landscaping or boundary treatments are in excess of 10 metres from our boundary (this is our land boundary, not the carriageway), it is usually the case that no further information is required, although the applicant may need to demonstrate that the distance is sufficient. Where landscaping etc is within 10 metres of our boundary, further details will need to be provided for National Highways approval. For instance, some plants are particularly invasive and can pose a threat to our own vegetation and assets. Further information on the species of plants to be avoided can be provided if required.

Geotechnical

Any excavation and/or landscaping works has the potential to undermine the integrity and stability of the adjacent highway network. As such, if excavation works are within 10 metres of our boundary, prior to the commencement of any excavation (including in relation to landscaping), it would be necessary to set out how geotechnical risks will be identified and managed. This would be undertaken in accordance with Chapter CD122 of the Design Manual for Roads and Bridges (DMRB) and would need to be submitted for our review and approval. In addition, further information would be required with reference to *BS5837: 2012 Trees in relation to design, demolition and construction*. This is to ensure that our tree stock and associated root systems are protected.

Lighting

Any external lighting schemes have the potential to cast a glare on the adjacent highway causing a road safety hazard. As such, National Highways should be consulted on the details any external lighting schemes.

Glint and Glare

Looking at the information submitted, there appears a reasonable chance that the solar panels would be visible to road users on the SRN. If the panels are visible to road users, the applicant would need to produce a glint and glare assessment, that identifies the potential risk to road users and how it would be mitigated. Alternatively, the applicant should provide further information to explain how the solar panels would not be visible to SRN road users.

We hope this is useful in the progression of the DCO application. If I can be of any further assistance, please do not hesitate to contact me.

Yours sincerely,

██████████

██████████

Midlands Operations Directorate

Email: ██████████@nationalhighways.co.uk

Rishabh Rai

From: NATS Safeguarding <NATSSafeguarding@nats.co.uk>
Sent: 01 April 2026 11:12
To: Arrow Valley Solar
Cc: NATS Safeguarding
Subject: RE: EN0110033 Arrow Valley Solar EIA Notification

You don't often get email from natssafeguarding@nats.co.uk. [Learn why this is important](#)

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains the LPA's responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours Faithfully

NATS

NATS Safeguarding

D: 01489 444687
E: natssafeguarding@nats.co.uk

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk



NATS Internal

From: Arrow Valley Solar <ArrowValleySolar@planninginspectorate.gov.uk>
Sent: 30 March 2026 14:31
Subject: EN0110033 Arrow Valley Solar EIA Notification

Your attachments have been security checked by Mimecast Attachment Protection. Files where no threat or malware was detected are attached.

Dear Sir/Madam

Please see attached correspondence on the proposed Arrow Valley Solar Farm.

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **27 April 2026**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards,



Rishabh Rai (He/Him)
Associate EIA Advisor
Planning Inspectorate

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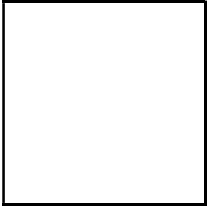
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Date: 27 April 2026
Our ref: 545300
Your ref: EN0110033



Joseph Jones
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BY EMAIL ONLY

T 0300 060 900

Dear Joseph

Environmental Impact Assessment Scoping Consultation under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulation 11

**Proposal: Arrow Valley Solar
Location: South Warwickshire and East Worcestershire**

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated and received on the 30 March 2026.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

A robust assessment of environmental impacts and opportunities, based on relevant and up to date environmental information, should be undertaken prior to an application for a Development Consent Order (DCO). Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development.

For any further advice on this consultation please contact the case officer Gillian Driver and copy to consultations@naturalengland.org.uk.

Yours sincerely

[Redacted signature]

Ms [Redacted]
Senior Officer
Sustainable Development
West Midlands Area Team

Annex A – Natural England’s Advice on EIA Scoping

1. General principles

Regulation 11 of the Infrastructure Planning Regulations 2017 - (The EIA Regulations) sets out the information that should be included in an ES to assess impacts on the natural environment. This includes:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases
- Appropriately scaled and referenced plans which clearly show the information and features associated with the development
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen
- A description of the aspects and matters requested to be scoped out of further assessment with adequate justification provided¹.
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation etc.) resulting from the operation of the proposed development
- A description of the aspects of the environment likely to be significantly affected by the development including biodiversity (for example fauna and flora), land, including land take, soil, water, air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), cultural heritage and landscape and the interrelationship between the above factors
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium, and long term, permanent and temporary, positive, and negative effects. Effects should relate to the existence of the development, the use of natural resources (in particular land, soil, water and biodiversity) and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment
- An outline of the structure of the proposed ES.

2. Cumulative and in-combination effects

The ES should fully consider the implications of the whole development proposal. This should include an assessment of all supporting infrastructure.

Please consider the following and whether we are aware of other projects we think do need to be considered.

An impact assessment should identify, describe, and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment (subject to available information):

- a. existing completed projects

¹ National Infrastructure Planning [Advice Note Seven, Environmental Impact Assessment, Process, Preliminary Environmental Information and Environmental Statements](#) (see Insert 2 – information to be provided with a scoping request)

- b. approved but uncompleted projects
- c. ongoing activities
- d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
- e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

3. Environmental data

Natural England is required to make available information it holds where requested to do so. National datasets held by Natural England are available at <http://www.naturalengland.org.uk/publications/data/default.aspx>.

Detailed information on the natural environment is available at www.magic.gov.uk.

Natural England's SSSI Impact Risk Zones are a GIS dataset which can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the [Natural England Open Data Geoportal](#).

Natural England does not hold local information on local sites, local landscape character, priority habitats and species or protected species. Local environmental data should be obtained from the appropriate local bodies. This may include the local environmental records centre, the local Wildlife Trust, local geo-conservation group or other recording society.

4. Biodiversity and geodiversity

The assessment will need to include potential impacts of the proposal upon sites and features of nature conservation interest as well as opportunities for nature recovery through biodiversity net gain (BNG). There might also be strategic approaches to take into account.

Ecological Impact Assessment (EclA) is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal. [Guidelines](#) and an [EclA checklist](#) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).

For additional information relating to Solar Parks, it may be helpful to refer to the Technical Information Note at the link below, which provides a summary of advice about their siting, their potential impacts and mitigation requirements for the safeguarding of the natural environment. [Solar parks: maximising environmental benefits - TIN101](#).

For additional information regarding the impact of solar farms on birds, bats and general ecology, please refer to the report below, which provides an evidence review of relevant scientific and grey literature. [Evidence review of the impact of solar farms on birds, bats and general ecology 2016 - NEER012 \(naturalengland.org.uk\)](#)

Designated nature conservation sites

International and European sites

This NSIP is unlikely to adversely impact any European or internationally designated nature conservation sites.

Nationally designated sites

Sites of Special Scientific Interest

Sites of Special Scientific Interest are protected under the Wildlife and Countryside Act 1981 (as amended). Further information on the SSSI and its special interest features can be found at www.magic.gov.uk.

Natural England's SSSI Impact Risk Zones can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the [Natural England Open Data Geportal](#).

The development site is within or may impact on the following Sites of Special Scientific Interest:

- [Wylde Moor, Feckenham SSSI](#)
- [Long Meadow, Thorn SSSI](#)

The ES should include a full assessment of the direct and indirect effects of the development on the features of special interest within the SSSIs and identify appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects.

Site name with link to citation	Potential impact pathways where further information/assessment is required
Wylde Moor, Feckenham SSSI	Hydrology- ground water/ water supply, run off/pollution, introduction of Invasive Non-native Species (INNS), noise and vibration, dust, lighting.
Long Meadow, Thorn SSSI	Run off/pollution, introduction of Invasive Non-native Species (INNS).

Regionally and Locally Important Sites

The ES should consider any impacts upon local wildlife and geological sites, including local nature reserves. The ES should set out proposals for mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improved connectivity with wider ecological networks. Non-statutory consultees such as the Wildlife Trusts should also be approached.

5. Protected species

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, otter, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of

species protected by law. Records of protected species should be obtained from appropriate local biological record centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area.

The area likely to be affected by the development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants.

Natural England has adopted [standing advice](#) for protected species, which includes guidance on survey and mitigation measures. A separate protected species licence from Natural England or Defra may also be required. Applicants can also make use of Natural England's charged service [Pre Submission Screening Service](#) for a review of a draft wildlife licence application.

6. Priority Habitats and Species

Priority Habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Lists of priority habitats and species can be found [here](#). Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. Sites can be checked against the (draft) national Open Mosaic Habitat (OMH) inventory published by Natural England and freely available to [download](#). Further information is also available [here](#).

An appropriate level habitat survey should be carried out on the site, to identify any important habitats present. In addition, ornithological, botanical, and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present.

The ES should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys)
- Additional surveys carried out as part of this proposal
- The habitats and species present
- The status of these habitats and species (e.g. whether priority species or habitat)
- The direct and indirect effects of the development upon those habitats and species
- Full details of any mitigation or compensation measures
- Opportunities for biodiversity net gain or other environmental enhancement

7. Ancient Woodland, ancient and veteran trees

The Ancient Woodland Inventory has been and continues to be updated, the ES should ensure that the data it uses is the most up to date. Further information can be found here- [Ancient Woodland - Revised \(England\) - Completed Counties | Natural England Open Data Geoportal](#)

The following sites are listed in Natural England's National Inventory of Ancient Woodlands as ancient woodland and are located within the site boundaries either partly or wholly, but have not been included in the Scoping Report:

Hanging Wood -CRC1
Marl Cliff – CRC3

The ES should assess the impacts of the proposal on the ancient woodland and any ancient and veteran trees, and the scope to avoid and mitigate for adverse impacts. It should also consider opportunities for enhancement.

Ancient woodland is an irreplaceable habitat of great importance for its wildlife, its history, and the contribution it makes to our diverse landscapes. Paragraph 186 of the National Planning Policy Framework (NPPF) sets out the highest level of protection for irreplaceable habitats and development should be refused unless there are wholly exceptional reasons, and a suitable compensation strategy exists.

Natural England maintains the [Ancient Woodland Inventory](#) which can help identify ancient woodland. The [wood pasture and parkland inventory](#) sets out information on wood pasture and parkland.

The [ancient tree inventory](#) provides information on the location of ancient and veteran trees.

Natural England and the Forestry Commission have prepared [standing advice](#) on ancient woodland, ancient and veteran trees.

8. Biodiversity net gain (BNG)

The Environment Act 2021 includes NSIPs in the requirement for BNG, with the biodiversity gain objective for NSIPs defined as at least a 10% increase in the pre-development biodiversity value of the on-site habitat. It is the intention that BNG should apply to all terrestrial NSIPs accepted for examination, currently from November 2026. Although BNG is not yet a mandatory requirement for NSIPs, we strongly recommend that BNG provision is secured through this development. This will reflect the important role NSIPs must play in delivering the government's environmental targets.

The biodiversity baseline should include all land contained within the site's red line boundary and proposals can be iteratively refined over time and throughout detailed design.

We encourage developers to:

- develop their BNG proposals in adherence with well-established BNG principles
- use the latest version of the Defra biodiversity metric, adhering to the metric guidance

Biodiversity gains should ideally be secured for a minimum of 30 years and be subject to adaptive management and monitoring. BNG plans should be secured by a suitably worded requirement in the DCO.

Natural England considers that major infrastructure developments should set the highest environmental standard. They should lead by example in showing how investment in sustainable infrastructure can better serve communities, including through the delivery of environmental goals, such as flood resilience, expanding natural habitats and contributing

toward Net Zero greenhouse gas emissions. Nature-based solutions built into infrastructure schemes provide one means for setting in place the government's [25 Year Environment Plan](#).

Natural England recognises the high opportunity for the development to deliver BNG on-site and it is recommended that the following guidance is applied in order to achieve this:

- [Biodiversity Net Gain: Good Practice Principles for Development](#)
- [BS 8683: 2021 Process for designing and implementing Biodiversity Net Gain Specification](#)

In order to maximise nature recovery and target habitat enhancement where it will have the greatest local benefit it is recommended that locally identified opportunities should be acknowledged and incorporated into the design of BNG (both on and off-site). This should include any locally mapped ecological networks and priority habitats identified within and close to the development site.

In addition, Local Nature Recovery Strategies (LNRS) are a mandatory system of spatial strategies for nature established by the Environment Act 2021 which will contribute to the national Nature Recovery Network (NRN). Work is currently underway to develop these strategies, which will identify strategic priorities for nature protection, recovery, and enhancement. Given the size and scale of the project, there are opportunities not only for enhancing biodiversity in the locality, but also to create and enhance ecological connectivity in the area, contributing to the Nature Recovery Network and climate change resilience. It is recommended that engagement with relevant local planning authorities, responsible authorities and statutory consultees (including Natural England) is undertaken to align habitat enhancement with the Warwickshire LNRS and Worcestershire LNRS (published).

9. Landscape

Nationally designated landscapes

The development site may impact on the [Cotswolds National Landscape \(AKA Area of Outstanding Natural Beauty\)](#) and its special qualities.

Landscape and visual impacts

Public bodies have a duty to seek to further the statutory purposes of designation in carrying out their functions (under section 245 of the Levelling Up and Regeneration Act 2023). This duty also applies to proposals outside the designated area but impacting on its natural beauty.

The National Policy Statement for the relevant sector might have stronger protections. The Energy National Policy Statement EN-1 gives significant protection including within the setting of the protected landscape.

Consideration should be given to the direct and indirect effects on this designated landscape and in particular the effect upon its purpose for designation. The management plan for the designated landscape may also have relevant information that should be considered in the EIA.

The environmental assessment should refer to the relevant [National Character Areas](#). Character area profiles set out descriptions of each landscape area and statements of environmental opportunity.

The EIA should include a full assessment of the potential impacts of the development on local landscape character using [landscape assessment methodologies](#). We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute (LI) and Institute of Environmental Management and Assessment (IEMA) in 2013. LCA provides a sound basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character.

A landscape and visual impact assessment should also be carried out for the proposed development and surrounding area. Natural England recommends use of the methodology set out in Guidelines for Landscape and Visual Impact Assessment 2013 (3rd edition) produced by LI and IEMA. For National Parks and AONBs, we advise that the assessment also includes effects on the 'special qualities' of the designated landscape, as set out in the statutory management plan for the area. These identify the particular landscape and related characteristics which underpin the natural beauty of the area and its designation status.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. This should include an assessment of the impacts of other proposals currently at scoping stage.

To ensure high quality development that responds to and enhances local landscape character and distinctiveness, the siting and design of the proposed development should reflect local characteristics and, wherever possible, use local materials. Account should be taken of local design policies, design codes and guides as well as guidance in the [National Design Guide](#) and [National Model Design Code](#). The ES should set out the measures to be taken to ensure the development will deliver high standards of design and green infrastructure. It should also set out detail of layout alternatives, where appropriate, with a justification of the selected option in terms of landscape impact and benefit.

The National Infrastructure Commission has also produced [Design Principles for National Infrastructure - NIC](#) endorsed by Government in the National Infrastructure Strategy.

10. Connecting people with nature

The ES should consider potential impacts on access land, common land and public rights of way in the vicinity of the development, in line with NPPF paragraph 104 and there will be reference in the relevant National Policy Statement. It should assess the scope to mitigate for any adverse impacts. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

Measures to help people to better access the countryside for quiet enjoyment and opportunities to connect with nature should be considered. Such measures could include reinstating existing footpaths or the creation of new footpaths, cycleways, and bridleways. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Access to nature within the development site should also be considered, including the role that natural links have in connecting habitats and providing potential pathways for movements of species.

Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

11. Soils and agricultural land quality

We note under chapter 8 Soils and Agriculture (Scoping Report- Volume I Main Report) that the Applicant has scoped out every topic except Agricultural land holdings (Table 8-5 Scoping Report- Volume I Main Report), we would advise that the ES includes an assessment of impacts on soil resources and agricultural land. This proposal covers 1762 hectares (ha) (1.1.2 Scoping Report- Volume I Main Report) of primarily agricultural land. National data shows the site contains a high proportion of BMV- 535 ha of grade 2 and 1228 ha of grade 3 (Table 8-4 Scoping Report- Volume I Main Report).

Site selection- NE advise that a detailed Desk Based Soil Assessment (DBSA) should be carried out during optioneering and site selection, including during cable route selection, considering:

- [Provisional Agricultural Land Classification \(ALC\) Mapping](#)
- Historic post 1988 ALC Survey Data
- Likelihood of Best and Most Versatile (BMV) Agricultural Land - Strategic scale maps
- Soil associations mapping
- [LandIS - Land Information System - Soilsclapes soil types viewer](#) or BGS data to identify likely soil types across the site(s)

Soils are a valuable, finite natural resource and should also be considered for the ecosystem services they provide, including for food production, water storage and flood mitigation, as a carbon store, reservoir of biodiversity and buffer against pollution. It is therefore important that the soil resources are protected and sustainably managed. Impacts from the development on soils and best and most versatile (BMV) agricultural land should be considered. The proposal should avoid BMV as far as reasonably practicable in line with 5.11.12 of [Overarching National Policy Statement for energy \(EN-1\), 2025](#). Further guidance is set out in the Natural England [Guide to assessing development proposals on agricultural land](#).

The following issues should be considered and, where appropriate, included as part of the ES:

- The degree to which soils would be disturbed or damaged as part of the development.
- The extent to which agricultural land would be disturbed or lost as part of this development, including whether any BMV agricultural land would be impacted.

This may require a detailed Agricultural Land Classification (ALC) survey if one is not already available. For information on the availability of existing ALC information see www.magic.gov.uk.

- Where an ALC and soil survey of the land is required, this should normally be at a detailed level, e.g. one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres. The survey data can inform suitable soil handling methods and appropriate reuse of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, allotments and public open space).
- The ES should set out details of how any adverse impacts on BMV agricultural land can be minimised through site design/masterplan.
- The ES should set out details of how any adverse impacts on soils can be avoided or minimised and demonstrate how soils will be sustainably used and managed, including consideration in site design and master planning, and areas for green

infrastructure or biodiversity net gain. The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise off-site impacts.

Further information is available in the [Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites](#) and The British Society of Soil Science Guidance Note [Benefitting from Soil Management in Development and Construction](#). Criteria on the assessment of impacts to BMV land can be found here: [IEMA's 'A New Perspective on Land and Soil in Environmental Impact Assessment](#) and the Institute of Civil Engineers (2019) EIA handbook.

12. Air quality

Natural England advises that the potential for air quality impacts arising from this NSIP needs to be assessed. Natural England refers you to our standard advice on air quality impacts which can be found in Annex B. This standard advice is Natural England's formal statutory advice. It provides decision makers with the information needed to fulfil their statutory duties when making decisions on proposals with potential air pollution impacts. An overall conclusion regarding impacts on statutory protected sites must take into account the standard advice for air pollution.

13. Climate change

The England Biodiversity Strategy published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify how the development will embed Nature Based Solutions, maintain ecological networks and build resilience to climate change. The ES should also incorporate the policies as set out in NPS EN-1 relating to climate change. The NPPF also requires that the planning system should contribute to the enhancement of the natural environment 'by establishing coherent ecological networks that are more resilient to current and future pressures' (NPPF Para 187), which should be demonstrated through the ES.

Annex B- Standard Advice for Air Quality Impacts in National Significant Infrastructure Projects (NSIPs)

Natural England provides the following standard advice on air pollution. This advice relates to the protection of protected sites under the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations) and the Wildlife and Countryside Act 1981 and should be taken as Natural England's formal representation. This standard advice is applicable to all stages of the NSIP process and may be used by the applicant for NSIP pre application stages, by the Examining Authority (ExA) during the statutory stages of the NSIP and by the relevant Secretary of State as the competent authority.

Protected sites are 'sites of special scientific interest' (SSSIs) and 'habitats sites' (also called 'European sites'). For the purposes of this advice, Habitats Sites are Special Areas of Conservation (SACs), possible SACs, Special Protection Areas (SPAs), Potential SPAs, Ramsar sites, and sites identified, or required, as compensatory measures for adverse effects on Habitats Sites. Although their regulatory frameworks differ, the general principles and approach for air pollution assessment outlined for Habitats Sites are also relevant for SSSIs. Where the following advice applies to both, we use the term protected sites. Where the advice or approach differs, the individual terms are used.

This includes advice on information that is required to assess this and how to interpret the results of air quality modelling for the decision maker to conclude whether air quality impacts would have an adverse effect on the integrity of a Habitat site or a SSSI. You should also consider any relevant caselaw that could affect how you carry out any air quality assessments.

Air pollutants

This advice covers the following air pollutants from the construction, operation and decommissioning phases of a proposal

- ammonia (NH₃)
- nitrogen oxides (NO, NO₂ or NO_x)
- nitrogen deposition
- acid deposition
- sulphur dioxide (SO₂)

Standing advice on air pollution and development is also available here:

<https://www.gov.uk/guidance/air-pollution-and-development-advice-for-local-authorities>

Whilst the standing advice does not cover NSIPs, it does include additional technical advice which may prove useful. However, in summary, Table 1 provides the steps that we advise should be taken to assess air quality impacts on protected sites. The applicant should provide their own assessment containing the information and detailed modelling you need. You need to review this and make your own conclusion.

Table 1: Sequential approach to air quality assessments

Stage	Step	Supplemental evidence/ basis for judgment
Initial screening for credible risk of an effect	1 Check Distance criteria - could significant emissions reach a protected site? Yes = move to Step 2 No = no further HRA required	The Air Pollution Information System (APIS) includes an introduction to air pollution. APIS provides site specific information on the interest features of individual protected sites and the sensitivity to air quality impacts of those features. Please see Table 2 for industrial air pollution screening distances. For road traffic impacts, roads on the affected road network that lie within 200m of a designated

			<p>site should be considered.</p> <p>Use Magic Map to check the location of designated sites. Search for the location then select the 'Designations' option.</p>
	2	<p>Check if the qualifying habitats or supporting habitat of qualifying species are sensitive to air quality impacts.</p> <p>Yes = move to Step 3 No = no further HRA required</p> <p>APIS Site relevant Critical Loads and Levels (based on literature and professional judgement) http://www.apis.ac.uk/src1</p> <p>Some habitats may not have a critical load because there is not enough data. In these cases, you should find the critical load for a similar habitat type or feature.</p>	<p>The qualifying features of Habitats Sites can be identified in the relevant Site Conservation Objectives and Supplementary advice packages, which include a definitive list of legally qualifying features. These objectives are available here. Alternatively, a list of qualifying features can also be found by searching for the Habitats Site and SSSIs on Designated Sites View, alongside Conservation Objectives and Supplementary Advice for Habitats Sites.</p> <p>The above links will also show whether any of the qualifying features for Habitats Sites have a Restore or Maintain Conservation Objective in relation to air quality thresholds (critical levels or loads).</p> <p>If the site is a SPA or an SAC/SSSI designated for an animal species (as opposed to a habitat), determine whether the predicted pollution effects on the supporting habitat will have a negative effect on the notified species.</p>
Detailed AQ modelling	3	<p>Undertake detailed modelling using a recognised dispersal model – i.e. Atmospheric Dispersion Modelling System (ADMS)</p> <p>Unless robust site-specific evidence is provided, we advise the lower range of the critical load should be used in modelling. If there are site specific reasons why it is more appropriate to use the higher end of the range, then this should be clearly evidenced.</p>	<p>Air Quality modelling should include relevant scenarios that are clearly identified.</p> <p>One such example of scenarios is a baseline plus future forecasts as follows: Baseline, a construction year, and future operational year(s), do nothing (without proposal), do something (with proposal); taking into account background trends for each pollutant).</p> <p>For proposals that will emit pollutants from a point source, it is helpful to provide isopleths of the dispersion modelling results, showing the predicted contours of pollutant concentration and deposition of the development. These may be assessed against the locations of protected sites and sensitive features within those sites.</p> <p>At least 3 years of meteorological data should be included within the AQ modelling for sources other than for road transport modelling</p> <p>The Institute of Air Quality Management (IAQM) has produced the following document to assist its members in the assessment of the air quality impacts of development on designated nature conservation sites: air-quality-impacts-on-nature-sites-2020.pdf</p>
Applying screening thresholds	4a	<p>Apply Screening Threshold Alone If below threshold alone, move to step 4b.</p>	<p>Ascertain the Process Contribution (PC) from the plan or project (emissions and predicted deposition). Apply Screening threshold (1% of</p>

		<p>If above = move straight to step 5</p>	<p>critical level or load) alone using the <u>annual averages</u>.</p> <p>If the process contribution is less than 1% of the relevant long-term benchmark (Environmental Assessment Level, Critical Level or Critical Load), the emission is not likely to have a significant effect <u>alone</u> irrespective of the background levels.</p>
	4b	<p>Apply Screening Threshold In-combination.</p> <p>If below threshold in-combination = no LSE/significant risk of damage etc and no further assessment required.</p> <p>If above = move straight to step 5</p> <p>Applicants might use the Joint Nature Conservation Committee (JNCC) 'decision-making thresholds' as a reason for not completing an in-combination assessment.</p> <p>If so, you should check they have correctly followed the JNCC guidance on decision-making thresholds. If this guidance shows they do not need to complete an in-combination assessment, continue to step 5. If applicants have not used the decision-making thresholds, or have not followed them correctly, they will need to provide an in-combination assessment.</p>	<p>Use information from competent authorities (Planning Portal, PINS NSIP register or Environmental Permitting register) to determine if there are plans or projects in the pipeline (not included in the current baseline) that should be considered in-combination</p> <p>If the combined process contribution is less than 1% of the relevant long-term benchmark (Environmental Assessment Level, Critical Level or Critical Load), the emission is not likely to have a significant effect <u>in-combination</u> irrespective of background levels.</p>
Detailed Assessment of ecological impacts	5	<p>This step is to consider the ecological impacts of AQ on the interest features of the designated site and is not based only on numerical figures.</p> <p>If it is not certain whether sensitive features are located within the areas to be impacted, a site visit may be helpful to determine this.</p> <p>For SSSIs, this step should provide all the information necessary, including any required mitigation, for the decision maker to determine if there would be an adverse effect on a SSSI.</p> <p>If Habitats Sites are impacted by the proposals, move to Step 6.</p>	<p>The following information is likely to be helpful for the decision maker:</p> <p>Is the sensitive feature(s) located within the pollution footprint? Should it be there for the site to meet its Conservation Objectives or is there some other, natural reason (e.g. hydrology), why the sensitive feature(s) would not be expected to occur there?</p> <p>Check APIS Trends Tab for reasonable expectation on whether background pollution may be decreasing or not.</p> <p>Habitats that have already been subject to high background nitrogen deposition can develop tolerance to further deposition. This cannot be used to justify further exceedance as it would undermine conservation objectives to reverse decline. You should consider predicted effects on the species richness of a habitat against the site's conservation objectives.</p>
Appropriate Assessment (AA) for habitats sites	6	<p>The competent authority to undertake their AA to conclude whether or not there will be an adverse effect on integrity (AEOI) of habitats sites. Any mitigation</p>	<p>Where mitigation is required to enable a conclusion of no adverse effect on integrity to be reached the AA must be able to show that mitigation measures can be relied upon to avoid adverse effects over the full lifetime of the project</p>

	<p>proposed should also be assessed at this point.</p> <p>Should the AA conclude that the proposal would have an AEOI that cannot be excluded with mitigation measures, consider the derogation route of the HRA process.</p> <p>Should compensation measures be required under derogation, please contact Natural England for specific advice.</p> <p>Note: If an AA has been undertaken of the proposals <u>alone</u> and concluded that there will not be an adverse effect on integrity, if there are residual impacts that are not fully mitigated, these will need to be considered in combination with other plans or projects</p>	<p>(ie construction, operation and decommissioning where relevant). To be viable, such measures should be effective, reliable, timely, guaranteed and of sufficient duration. The assessment of such measures should be supported by evidence.</p> <p>When deciding on whether the proposals set out in the NSIP will have an adverse effect on Integrity on a Habitats Site, the Conservation Objectives and any supplementary advice should be taken into account. Including whether the site is already exceeding the environmental thresholds for ammonia, nitrogen oxides and nitrogen deposition and has a restore conservation objective.</p>
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Mitigation measures

If you cannot conclude there is no adverse effect, the applicant will need to apply mitigation measures. Measures will only be appropriate if you can quantify their effectiveness in reducing emissions on the protected site. You should check that mitigation measures are in place to avoid adverse effects on site integrity over the lifetime of the project.

Mitigation may include measures that:

- the applicant volunteers
- you impose through formal conditions or restrictions in any permission or authorisation – these may be different or stricter measures than ones proposed by the applicant

Examples could include:

- relocation or redesign of developments to avoid impacts on protected sites
- control of other emissions of the same pollutants with an overlapping effect
- a change in stack height for industrial processes
- Euro 6 standards for construction machinery
- adding wooded shelterbelts, trees, green walls and hedges to limit dispersal of emissions, as long as these measures in themselves would not negatively impact the protected site

Table 2: Industrial air pollution screening distances

Emission source	Distance for SSSIs	Distance for habitats sites
Industrial developments	2km	5km
General combustion processes (under 20MW energy input)	500m	500m
General combustion processes (20MW to 50MW energy input)	2km	2km
General combustion processes (over 50MW energy input)	2km	10km
Mechanical and biological waste	500m	500m

treatment		
Landfill waste	2km	2km
Compost (under 500 tonnes maximum annual operational throughput)	500m	500m
Compost (500 to 75,000 tonnes maximum annual operational throughput)	1km	1km
Compost (over 75,000 tonnes maximum annual operational throughput)	2km	2km
Airports, helipads and other aviation proposals	5km	5km
Oil and gas exploration and extraction	500m	500m
Quarries	200m	200m
Other industrial developments causing air pollution	500m	500m

Additional advice

Common Standards Monitoring² is used to define the ecological condition of a protected site. It is undertaken on a broader level and does not currently consider air quality impacts. The relevant benchmark for assessing impacts is the critical thresholds. Therefore, the existing status of a designated site should not be the sole reason for judgement on potential impact.

For many protected sites, the current background pollution may already be exceeding the relevant critical load/level from a different source type to the project being assessed (e.g. where the main source of background exceedance is due to agriculture, but the proposal is an industrial project). Proposals must consider their own impacts against the relevant environmental thresholds. There are many reasons why background levels are high, but the conservation objective is to 'maintain or restore' air pollutants to within these benchmarks. The objective would be undermined by proposals that add further emissions, including if it compromises any strategic initiatives to reduce air pollution levels.

You must determine if there is evidence that the increased emissions represent a measurable risk and could compromise the strategic initiatives. You would need to consider information on:

- the extent to which any declining national trends in air pollution, or strategic initiatives to tackle emissions affecting the site more locally, might otherwise lead to improvements
- the rate at which such improvements are anticipated
- the extent of the impacts of a plan or project, and whether those impacts can properly be considered temporary and reversible

If the affected area is small, consider the risk to site integrity proportionally. For example, how important is the area in terms of rarity, location, distribution, vulnerability to change and ecological structure. If it is a supporting habitat, consider its importance to the designated species on the site. Consider any site survey information that may provide evidence of existing impacts.

² HYPERLINK "<https://jncc.gov.uk/our-work/common-standards-monitoring/>" [Common Standards Monitoring | JNCC - Adviser to Government on Nature Conservation](#)

Emissions from road transport (if applicable):

Emissions from road transport may be an operational impact or be limited to the construction phase of proposals. Roads on the affected road network that lie within 200m of a designated site should be considered. If all affected roads are further than 200m from a protected site, then there is no likely significant effect (habitats sites) or no impact (SSSIs) on protected sites from air pollution

Improvements in vehicle technology and a move to further electrification of the vehicle fleet will, over time, result in lower background levels of nitrogen deposition and nitrogen oxide pollution near to roads. As most sites are currently over the relevant thresholds and have a “restore” objective, this should be noted as a “retardation” of the restore objective and expressed in months and years. Retardation of less than one year is acceptable as air quality is considered against an annual average. Please note that ammonia impacts cannot be assessed in this manner as there is no certainty of a declining trend.

Defra Emissions Factor Toolkit

The Defra Emission Factor Toolkit (EFT) allows for gradual introduction of electric vehicles into the fleet (cars and LGVs) up to 2050. These are the emission factors we advise that NSIPs should be using (which we advise should also consider ammonia emissions as well as NOx – using one of three sets of emission factors available). However, the User Guide to the EFT highlights that calculation tools only support assessment years up to a certain date (2040 in the current version), reflecting that predictions and assumptions beyond then become less certain. Where EFT calculated emissions are to be used after this date to inform air quality assessments, the EFT indicates that appropriate caveats around the limitations of the analysis must be included to accompany the assessment. We therefore advise that emission factors no later than 2040 are used for HRAs– which would mean percentages of EVs are at predicted 2040 levels. A key concern is that, although EVs themselves have no tailpipe emissions, and the percentage of them will increase, the remaining combustion engine vehicles on the road may become more polluting as they age as selective catalytic reduction technology may create ‘ammonia slip’ over time. Ammonia slip is the unreacted ammonia (NH₃) that escapes from a selective catalytic reduction (SCR) or selective non-catalytic reduction (SNCR) system used to reduce NOx in exhaust gases. Please note that the current EFT should be used and the noted date may change over time.

Motorways within the affected road network

Please note the following paragraph relates to NSIP proposals where air quality impacts are being considered as a result of increased traffic only. This approach is not appropriate for proposals that would alter the strategic road network.

There is potentially an added complexity to the need for in-combination assessments when considering traffic on motorways, as including these roads can mean that the assessment takes account of traffic growth related to strategic factors or long range (external) trips that are independent of the specific plan or project and neighbouring plans or projects. These roads are strategically important and tend to have high volumes of traffic as well as being well represented in traffic models. The air quality assessment should therefore include traffic flows on these roads, but the external trips can be excluded from the initial screening assessment. A justification and explanation of which journeys are included and excluded in the traffic model should be provided.

The conclusions reached on the air pollution impacts of the HRA must be incorporated into the wider HRA conclusions for other impact pathways identified for the proposals.

How to Use this Advice in Decision Making

Provided you have followed the above advice and have been able to conclude there would be no adverse effects on any protected sites we would be able to agree with your decision to authorise the project

Rishabh Rai

From: [REDACTED]@networkrail.co.uk> on behalf of Town Planning NWC
<TownPlanningNWC@networkrail.co.uk>
Sent: 31 March 2026 13:31
To: Arrow Valley Solar
Subject: Planning Inspector - EN0110033 Arrow Valley Solar Farm EIA Notification DCO
Categories: EST

OFFICIAL

FAO Joseph Jones

Network Rail (NR) notes the proposal for:

EN0110033 Arrow Valley Solar Farm EIA Notification DCO

Network Rail has undertaken an assessment of the submitting consultation information and our current position is that there is insufficient information available to enable a full assessment of the impact on Network Rail interests at this stage.

We therefore request that the following information is included within the scope of the scheme's EIA and through parallel workstreams:

1. Detailed Location Plans o Plans showing all proposed crossings and intersections with Network Rail assets, including rail lines and associated infrastructure.
2. Rail Asset Impact Assessment o Clarify how the proposed works will affect Network Rail operations and assets, including any temporary or permanent works beneath or adjacent to rail lines. Included within this should be any impacts to railway signalling from glint & glare and assessments of the impacts to any level crossings which may be used as access or egress to the site(s). Developer to fully fund any required mitigation measures.
3. Property Agreements o The Promoter will be required to enter into appropriate Property Agreements with Network Rail for any works impacting our land or assets.
4. Asset Protection o The Promoter must liaise with Network Rail's Asset Protection Team and enter into appropriate Asset Protection Agreements to ensure safety and compliance during construction. (contact details below).
5. Regulatory Approvals o All necessary railway regulatory approvals will be required, including Land Clearance and any other consents relevant to works near or on railway property.

Notice for Developers on how to contact Network Rail (NR) Asset Protection (ASPRO)

The Network Rail Asset Protection & Optimisation team continually focus on improving interactions with their customers; to support this process they have introduced a system for submitting new enquiries and tracking existing schemes, the Asset Protection Customer Experience (ACE).

Please use this link to enter the [ACE Portal](#) and submit your enquiries. An initial submission and initial review are free of charge. Further involvement would be subject to fees.

Guidance on using the platform is in this link here: [Customer portal - quick reference guide \(networkrail.co.uk\)](#)

Submission of this form does not constitute acceptance nor permission by Network Rail, and the proposed works may be rejected.

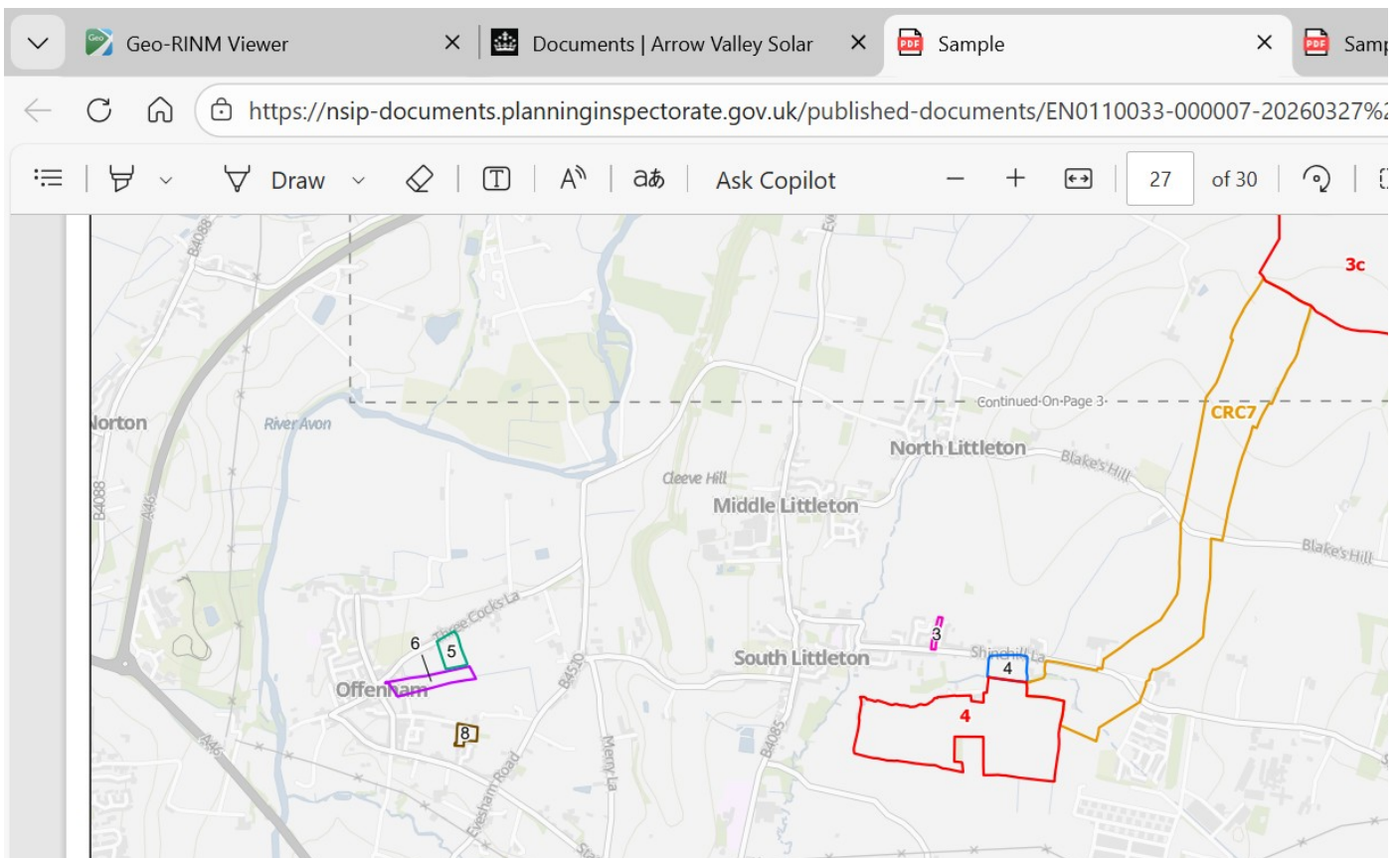
NR's Asset Protection purpose is to manage the activities of outside parties who wish to carry out planned works on, adjacent to or near the railway. ASPRO are not an emergency response team and require a suitable notification period to facilitate outside party works. Examples of Asset Protection activities include, but are not limited to:

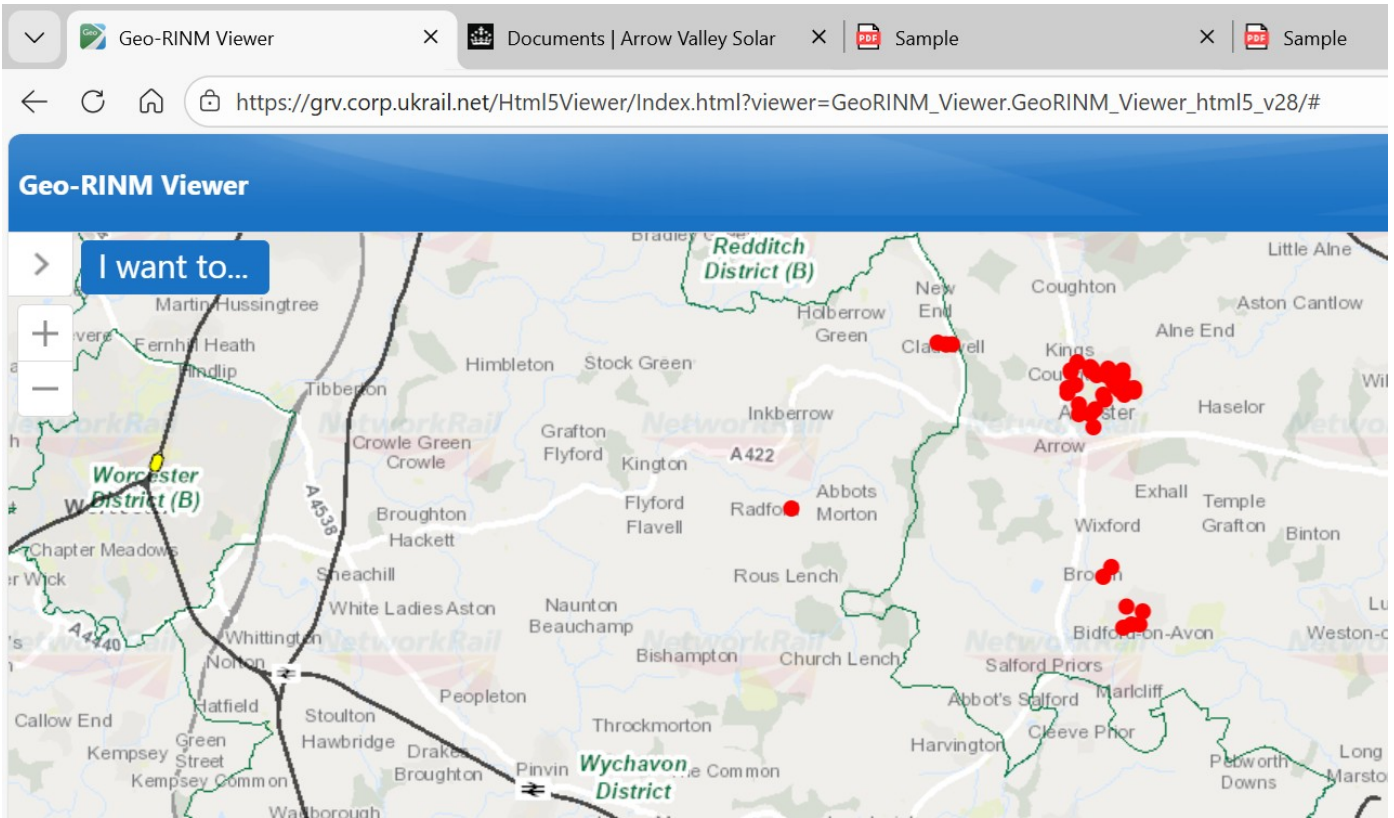
- o Tree felling
- o Works near Level Crossings
- o Lineside developments
- o Demolitions
- o Use of cranes adjacent to the railway
- o Construction of bridges across the railway

For emergencies that affect the safety of the line, please call 03457 11 41 41 and request to be put in touch with Control.

If your works are under the NRSWA, please provide the NRSWA Reference Number. The Safety at Street Works and Road Works Code of Practice states that, "works planned by any promoter on a road over rail, or under a rail over road bridge must be advised to Network Rail's Outside Party Engineer no later than one month in advance of serving the initial notice," (page 79).

For enquiries regarding Network Rail apparatus on / near the railway line i.e. C2 enquiry, please contact: OPBuriedServicesEnquiries@networkrail.co.uk





From

Diane Clarke RTPI Tech
Town Planning Technician NWC
Network Rail Property (NW&C)
Square One, 4 Travis Street, Manchester M1 2NY
Email address for all applications and notifications: TownPlanningNWC@networkrail.co.uk

NetworkRail



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Bromsgrove
District Council
www.bromsgrove.gov.uk



Contact Details:

Case Officer: [REDACTED]
Tel: [REDACTED]
Email: [REDACTED]@bromsgroveandredditch.gov.uk

Please Reply to;
Town Hall, Walter Stranz Square,
Redditch,
Worcestershire
B98 8AH

Your Ref: EN0110033
Our Ref: 26/00383/EOR
Date: 21st April 2026

By email to: ArrowValleySolar@planninginspectorate.gov.uk

**Planning Act 2008 (As Amended) and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations)
Application by (Arrow Valley Solar Limited the Applicant) for an Order granting Development Consent for Arrow Valley Solar and BESS Project (the Proposed Development) EIA Scoping Opinion Request**

Dear Sir/Madam,

I refer to the above and a communication received by the Council on the 30th of March 2026, providing a consultation notification by the Planning Inspectorate with regard to the above-mentioned project and the EIA Scoping request received from the applicant.

The project proposals include:

- 500MW solar array covering multiple connected sites that total approximately 1111ha.
- 250MW Battery Energy Storage System (BESS)
- Grid Connection, substations and associated infrastructure.

In its capacity as a Consultation Body, under the EIA Regulations, Redditch Borough Council have reviewed the information, including the Scoping Report and the List of Tables.

Following a review of the Scoping Report, we note that the applicant intends to consider the potential for cumulative effects in relation to projects and planning applications being implemented. It would be useful to have a clearer understanding of the geographical scope of the assessment of the cumulative effects.

It is noted in para 4.3.35 that the final route and extent of the Cable Route Corridor (CRC) will be refined through further environmental assessments, landowner negotiations and consultation and engagement input from other stakeholders, including host authorities. In this respect, engagement with Parish Councils including Feckenham Parish Council would be advisable.

The following consultation comments have been received by Redditch Borough Council in relation to the pre application stage scoping consultation:

Worcestershire County Council (WCC) Historic Environment Officer

The inclusion of heritage, notably - Indirect impacts to Designated Assets; Direct and Indirect impacts on non-designated assets; Direct Impacts to Archaeological Remains and the Historic Landscape within the scope of the Environmental Statement is supported. The submitted Scoping Report sets out a satisfactory methodology to assess and understand the likely significant effects of the scheme, including the worst-case scenario for the final cable route.

It is noted that a Geophysical Survey is not being undertaken in the CRC search area in Q1 2026. While this is acceptable, bearing in mind the interpretation of geophysics along narrow strips is problematic, it is recommended that geophysics, where feasible (i.e. where multiple trenches or temporary construction compounds are proposed), be considered to derisk potential route options and to inform any future strategy for further investigation.

Historic England

Historic England is a statutory consultee to the Planning Inspectorate on NSIP cases. Therefore, comments will be provided directly to the Planning Inspectorate and advice to the Local Planning Authority will not be provided on these cases.

Worcestershire Regulatory Services (WRS) – Contaminated Land

In relation to the request for scoping opinion references 26/0001/NSIP (WCC), 26/00383/EOR (BDC / RBC) - Arrow Vally Solar and Battery Storage, Worcestershire Regulatory Services (WRS) have reviewed the proposal in relation to contaminated land. This has included a review of the document entitled “Environmental Impact Assessment (EIA) Scoping Report - Volume I Main Report”, Arrow Valley Solar, Document Reference AVS-ATR-GEN-AA-DOC-ENV-000001, dated March 2026, and reference to the other submitted documents and plans. The WRS comments are based on the information we have for Worcestershire in the districts of Redditch Borough Council and Wychavon District Council (largely includes parts of sites 1 and 3, site 4 and areas of the cable route corridor). WRS do not have access to contaminated land records outside of the county. These comments relate to contaminated land and potential risks to human health. Chapter 7 of the EIA Scoping Report specifically covers Ground Conditions and Contamination and sets out the scope for the proposed assessment, providing a summary of ground conditions and potential sources of contamination. The chapter includes a review of available historical and environmental information. The report sets out the sources of contamination which generally include made ground associated with various features, the electricity substation at Feckenham, and general impacts from farming and agriculture. The report outlines that some mitigation measures will be incorporated and managed as part of the construction process including considerations within the design, implementation of a soils management plan where excavation of soils is undertaken, environmental management plans and various health and safety procedures adopted during the construction process. Further assessment is proposed for potential risks to human health in relation to “effects from contamination associated with potential on-site current and historical sources, and those off-site in the Study Area which may migrate to the Site in soil derived dusts or groundwater (all Sub-Sites and CRC areas)”. Other potential sources (such as those arising during construction) have been scoped out of the assessment as they are to be managed through “best practice construction methods and operational procedures and monitoring to be detailed in the CEMP and OEMP”. Risks from ground gas have also been scoped out as they are to be managed through design, with “no proposed enclosed structures as part of the Scheme within which ground gas may accumulate. The solar arrays, substations, sub distribution switch rooms, conversion units, BESS and ancillary development are either external or sufficiently ventilated” (Table 7-5, page 228).

WRS are in agreement for the further assessment to be carried out to determine potential risks from contamination. Significant areas of potential contamination issues have not been identified from the records held by WRS within Worcestershire for the site areas provided as much as can be ascertained from the available information. The majority of the site appears

to be agricultural land with the exception of the electricity substation in Feckenham (WRS reference 14/00437/HM – Electrical Production and Distribution) which is shown on historical maps dated c. 1968/75 onwards. This feature also includes two small, infilled ground features (ditch and a pond) that appear to have been infilled to make way for the substation.

There is another feature, highlighted as a potential contaminated land concern within the WRS records located in Wychavon although this has not been included within the EIA report. This is identified as 'Bidford Gliding Centre Airport, Buckle Street', reference WD/44/CL, which is located within site 3C and in the vicinity of 3B. A screen shot from the WRS records showing this feature is set out below:



Whilst significant areas of landfill or made ground have not been noted within the WRS records relevant to the site, there may be natural or unknown sources of ground gas present. The EIA statement reports that there will be no risks from ground gas associated with the proposal due to features either being external or sufficiently ventilated. However, WRS would recommend that particular attention is paid to areas of potential ground gas risk where confined spaces or buildings are proposed, such as switch rooms, inspection pits, or other buildings. Ground gas may accumulate in such areas if present and can therefore present a risk to site users/operatives. Further information should be provided in relation to the ventilation aspects of such spaces to demonstrate this. WRS have no adverse comments to raise in respect of the scoping opinion. The proposed contamination assessment should be undertaken to assess potential risks from contamination and inform requirements for any site investigation and subsequent mitigation measures as necessary. All assessment is required to be undertaken by competent persons with the relevant qualification and experience and meet the requirements of the <https://www.gov.uk/government/publications/land-contamination-risk-management-lcrm> and other current industry guidance and best practice.

Worcestershire Regulatory Services WRS - Noise

No comments.

Worcestershire Regulatory Services WRS – Air Quality

WRS notes that operational Air Quality will be scoped out of the EIA as there is unlikely to be any measurable impact in this respect. WRS concur with this conclusion and have no additional comments in this respect.

North Worcestershire Water Management (NWWM) – Drainage

With the exception of the cable route corridor connecting the proposed PV sites to the existing Feckenham substation, most of the proposed development falls within Wychavon District Council and Stratford-on-Avon District Council areas. These comments only relate to the development that falls within the area of Redditch Borough Council.

The proposed development is situated in the catchments of the Doe Bank Brook and the Brandon Brook. Based on the EA's flood mapping, the proposed cable route corridors run through several areas at significant risk of surface water flooding (please see <https://flood-map-for-planning.service.gov.uk/>). Due to this, a detailed drainage strategy must be submitted to ensure flood risk is not created or exacerbated on the site or to the surrounding area.

Most considerations we would typically expect at this stage have been provided with the scoping report, with the drainage strategy to be provided via a DCO application. However, as this is not a planning application, the following is primarily a statement of our additional requirements at a further stage.

Fluvial flood risk has been modelled. However, the upper catchments of the watercourses may not be included in the modelling due to limits on catchments less than 3km². Fluvial flood risk modelling must account for watercourses below this size, including the upper catchments. Additionally, while surface water has been considered in the main report, no models have been provided with the scoping report. Surface water flood risk models must be provided due to the established risk of flooding within the development site.

It is proposed that the cable route corridor will be buried underground, and the cables will cross several watercourses, predominantly the Doe Bank Brook and Brandon Brook. It is requested that further information regarding cable installation through intersecting watercourses is provided at a further application stage. The applicant should also note that a Land Drainage Consent may be required if any proposed works have the potential to alter the flow in an ordinary watercourse, as set out in Land Drainage Act 1991, Section 23.

In conclusion, a detailed plan of the proposed solar farm has been provided with the scoping report and it is appropriate for the drainage strategy to be submitted via the DCO application. However, it is recommended that following information is provided at a later stage:

- Fluvial flood risk modelling accounting for watercourse catchments less than 3km².
- Surface water flood risk modelling.
- Further details regarding the cables to be installed beneath watercourses.

Arboricultural Officer

A subsequent formal application should include an Arboricultural Method Statement in respect of any trees potentially impacted by the proposed development.

Worcestershire County Council Public Rights of Way

The scoping documents have been reviewed and it is considered that there is a sufficient level of detail regarding public rights of way at this stage.

Natural England

As NE are consulted directly by PINS for NSIP projects, comments will be provided directly to them.

Worcestershire Wildlife Trust

In view of the scale of the proposed development, it is clear that there is considerable potential for ecological harm if the development is not progressed in a suitably sensitive manner. In order to inform this process, it will be essential to gather appropriate levels of ecological information, potentially across multiple seasons, in order to develop detailed designs and plans for implementation. Aftercare and long-term management of the solar sites and ancillary compounds etc. will also be important and should be considered early on as part of this process. As you would expect, the comments set out below are limited to ecological considerations in Worcestershire. Noting that matters of landscape and visual amenity, traffic and transport and drainage/flood defence may also be significant. In this case our silence on those issues, or other relevant matters, should not be taken to diminish their importance.

For the most part, it is considered that the approach to the EIA set out in the scoping report is sensible and proportionate and should provide the bulk of the information required by the examining authorities. However, we would like to make the following specific observations in

relation to the EIA scoping so that they may inform your response to PINS and the Secretary of State.

1. The scale of the development (including the solar array sites, the various CRCs and the implications of traffic and noise etc. associated with construction) mean that the proposed development has potential to have profound impacts on nearby features as well as the land directly developed. The ramifications of this 'offsite' harm need to be as well considered as the on-site impacts on habitats and species. This is especially relevant in relation to designated assets, such as SSSIs, but is also important in relation to Local Wildlife Sites, Roadside Verge Nature Reserves, Nature Reserves, ASNW and Veteran Trees, Traditional Orchard, Priority Habitats – especially grassland inventory sites - and sites or commuting corridors of particular importance for wildlife.
2. Given the recent publication of the Worcestershire LNRS (and the statutory weight to be attached to it - it should be upgraded to 'policy' from 'guidance ' for Worcestershire as per the Warwickshire commentary in Chapter 6 of the EIA scoping report), it is recommended that the EIA process has regard to the guidance in the LNRS in terms of considering relevant buffers to important features and in terms of priority actions that might most effectively go towards mitigating and compensating for any harm arising from the development. It would be helpful for the EIA to reference the LNRS in more detail and seek to align locational choices and potential mitigation approaches with the document where appropriate.
3. It is considered that the scoping report desk studies have picked out the key ecological assets and that they will be given appropriate consideration subject to important caveats set out below.
4. It is considered that the scoping report picks out key taxa for consideration and that for most part the survey methodologies chosen are proportionate to the proposals. However, there are important caveats to this also set out below.
5. In connection with bullet three above, we wish to particularly highlight the risk of potential impacts on Feckenham Wylde Moor SSSI, arising from the nearby CRC. The risks of contamination or dewatering as a result of trenching works within 130m of this important wetland must be fully considered in the EIA, including in terms of alternative route choices to limit risk, as far as possible.
6. It will be important to provide detail on the protection of all watercourses, within and close to the development envelope, both during construction and thereafter. It seems that the proposal is to deliver this protection through an oCEMP approach but while this is helpful, it does not accord with the mitigation hierarchy in terms of avoidance of harm first and more information on the route choices for the CRC and standoffs from waterbodies on a site by site basis would be helpful as part of the EIA.
7. In addition, it will be important to consider potential downstream receptors in the event of spills or silt intrusion during construction. The detail on this seems quite light at present and it would be helpful to better understand the protections in place in the event of a failure in the CEMP process.
8. We note the use of embedded mitigation to be detailed in the DCO. This is welcome and helpful but must not be used in place of avoidance of harm as a first step. It would be helpful for the EIA to set out the procedures by which route choices and field-scale layout will seek to avoid harm before moving to embedded mitigation (for example in relation to noise barriers for noisy items or crossing points for watercourses, hedges etc). In connection with this, it would be helpful to clarify what 'where practicable' means in relation to trenchless river crossings. It will also be important to understand the alternatives used if a trenchless approach cannot be implemented.
9. Further to bullet four above, we note that the bat survey methodology uses just 36 pairs of static detectors. This seems very limited and it is strongly recommended that you discuss the need for additional survey effort with your in-house ecologists. We are content to defer to their opinions in this regard but feel that additional evidence in relation to bats will be important in the context of the habitats present within the area

- and the scale of the proposed development. In addition, we recommend that close consideration is given to any noise impacts that might affect bats. Ultrasonic sound emissions for noisier items such as BESS may have impacts and so survey work may have to take a particular view on this aspect of the application.
10. In relation to bullet point four, it is noted that winter bird surveys were only conducted very early in the season. This is probably acceptable in the context of the site but again, it is recommended that additional consideration be given to the need for more information on this aspect of the EIA.
 11. Further to bullet nine, there is very little detail on predicted noise impacts (both from construction and operation) on wildlife generally. This appears to be an oversight, and it is strongly recommended that further consideration is given to this in the EIA. Impacts may vary by species group, season and duration but should still be considered. A reduction in habitat quality or severance of commuting or foraging corridors may be caused by noise and so positioning of, or mitigation for, noisy items may need further work. Any such steps would need to be informed by appropriate levels of information that are, as yet, absent from the noise and ecological chapters in the scoping report.
 12. It is noted that the proposed approach to buffering trees and woodland and would recommend that the minimum 15m for mature trees and woodland be extended to all trees and hedges to allow for growth during the 60-year lifespan of the proposed project. This may have ramifications for developable areas and on-site track, and panel layouts etc. and so should be considered in the EIA.
 13. Given the number of waterbodies and watercourses in the study area, it would be helpful to have more detail on the justification for scoping out wetland invertebrates, especially in relation to high value assets such as LWS watercourses, several of which are within or close to the proposed solar arrays.

Environment Agency

As with all Nationally Significant Infrastructure Projects (NSIPs), the Environment Agency will be providing our response to the EIA Scoping consultation directly to PINS.

Hereford & Worcester Fire and Rescue Service

The Service have no comment to make as respect of the Environmental Statement but will forward our consultation comments at application stage.

Health And Safety Executive

On 30 March 2026, HSE received a formal consultation from the Planning Inspectorate (PINS) regarding the NSIP for the Arrow Valley Solar Project. The submission is currently with one of our inspectors for assessment. When the NSIP EIA review is completed, a copy of the HSE's advice will be provided to the LPA.

There have been no responses to the consultation from Severn Trent Water Ltd, the Woodland Trust, WCC Minerals Safeguarding or WCC Highways.

I trust that the above advice and consultation responses are of assistance to you,

Yours Sincerely


Case Officer



Development Team
Rugby Borough Council
Town Hall
Evreux Way
Rugby
CV21 2RR

Our reference: PR26/0214
Your reference: EN0110033

20 April 2026

Joseph Jones
Environmental Services
Infrastructure Decisions and Applications Service
Planning Inspectorate

By email only

Dear Joseph,

Proposal: Planning Inspectorate Consultation EN0110033 - Proposed solar farm
Site Address: Arrow Valley Solar Farm

I refer to your letter of 30 March 2026 regarding the above.

Rugby Borough Council has no comments to make on the Scoping Opinion request.

Yours sincerely,


Principal Planning Officer - Consultant
Rugby Borough Council



Salford Priors Parish Council

Formal Response to PINS on the Arrow Valley Solar EIA Scoping Report (EN0110033)

Submitted to: The Planning Inspectorate (PINS)

From: Salford Priors Parish Council (SPPC)

Subject: Response to the Environmental Impact Assessment Scoping Report (March 2026)

Scheme: Arrow Valley Solar

1. Executive Summary

Salford Priors Parish Council (SPPC) has reviewed the Arrow Valley Solar EIA Scoping Report (Volume 1) and submits this response to PINS under Regulation 10 of the EIA Regulations.

SPPC concludes that the Scoping Report omits several critical environmental, social, landscape, agricultural, heritage, and community-impact considerations, and in multiple areas proposes to scope out topics that must legally and reasonably be scoped in.

The Scoping Report fails to:

- Adequately assess landscape and visual harm to Salford Priors, Dunnington, Wood Bevington, Broom, Wixford and the wider area.
- Address cumulative impacts with other solar schemes and grid infrastructure.
- Properly evaluate loss of Best and Most Versatile (BMV) agricultural land, contrary to NPPF and SDC Core Strategy.
- Assess public rights of way including the proposed leisure trails route between Salford Priors and Wixford, tranquillity, dark skies, and rural character.
- Consider community wellbeing, mental health, and residential amenity.
- Address heritage setting impacts, including non-designated assets.
- Provide adequate detail on glint and glare, traffic, construction disturbance, hydrology, flood risk, and ecological fragmentation.
- Reflect the policies of the Salford Seven Neighbourhood Development Plan, which is a statutory part of the Development Plan.

SPPC therefore requests that PINS instruct the Applicant to significantly expand the scope of the Environmental Statement (ES) to include the matters set out in this submission.

2. Relevant Planning Policy Framework

2.1 National Planning Policy Framework (NPPF)

The following NPPF sections are directly engaged and must be fully assessed in the ES:

- Para 15–16: Plan-led system; NDPs form part of the Development Plan.
- Para 92: Healthy, safe, inclusive communities.
- Para 130: High-quality design, local character, sense of place.
- Para 152–158: Renewable energy must be balanced against environmental harm.
- Para 174–181: Protecting landscapes, soils, biodiversity, and habitats.



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- Para 185: Noise, tranquillity, and amenity.
- Para 199–208: Heritage assets and their settings.
- Para 100: Public rights of way must be protected and enhanced.

The Scoping Report does not demonstrate compliance with these requirements.

2.2 Stratford-on-Avon District Council Core Strategy (SDC CS)

Relevant policies include:

- CS.5 – Landscape: Protect rural character, avoid industrialisation of countryside.
- CS.6 – Natural Environment: Protect habitats, species, ecological networks.
- CS.7 – Green Infrastructure: Avoid fragmentation.
- CS.8 – Historic Environment: Protect heritage settings.
- CS.15 – Distribution of Development: Protect rural settlements.
- CS.16 – Housing Development: Protect residential amenity.
- CS.26 – Transport and Movement: Protect rural roads and PRow.
- CS.27 – BMV Agricultural Land: Avoid loss of Grades 1–3a.

The Scoping Report fails to address CS.5, CS.7, CS.26, and CS.27 in particular.

2.3 Salford Seven Neighbourhood Development Plan (NDP)

The NDP is a statutory part of the Development Plan and must be given full weight.

Relevant policies include:

- SP3 – Protecting the Rural Character and Environment
- SP11 – Woodlands, Trees and Hedgerows
- SP12 – Protecting the Best and Most Versatile Agricultural Land
- SP13 – Watercourses and Water Features
- SP4 – High Quality Design
- SP5 – Sustainability and Renewable Energy (amenity protection)
- SP14 – Footpaths and Cycleways
- SP25 – Leisure and Recreation Facilities

The Scoping Report does not reference the NDP at all, which is a significant omission.

3. General Observations on the Scoping Report

SPPC identifies the following overarching issues:

3.1 Excessive reliance on “embedded mitigation”

The Applicant repeatedly uses embedded mitigation as justification for scoping out topics. This is contrary to EIA principles, which require assessment of unmitigated effects first.



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3.2 Underestimation of landscape and visual harm

The scheme covers 1,762 ha, making it one of the largest solar NSIPs in the UK. The Scoping Report does not reflect the true scale of industrialisation.

3.3 Insufficient baseline data

Many topics rely on desk-based assumptions rather than field surveys.

3.4 Failure to consider community impacts

The Scoping Report treats socio-economic and human health impacts as negligible, which is not evidence-based.

3.5 Inadequate cumulative assessment

The report does not include:

- Other solar schemes in Warwickshire/Worcestershire
- Grid reinforcement projects
- BESS-related risk assessments
- Transport cumulative impacts

4. Detailed Topic-by-Topic Response

Below is a structured analysis of what must be included and what is missing.

4.1 Landscape and Visual Impact (LVIA)

Must be scoped in more extensively.

Missing / inadequate:

- Assessment of views from Salford Priors, Dunnington, Abbots Salford, Iron Cross, Rushford, and Broom.
- Assessment of cumulative landscape industrialisation.
- Assessment of night-time lighting, contrary to NPPF para 185.
- Assessment of tranquillity and dark skies (Cotswolds National Landscape is intervisible).
- Full Zone of Theoretical Visibility (ZTV) modelling.
- Photomontages from all PRoW and key village viewpoints.

SPPC is concerned that the baseline mapping used in the detailed plan may be out of date and may not show all existing and consented residential receptors. The Applicant should ensure that the EIA is based on accurate, up-to-date mapping and topographical information, and that all relevant receptors are included within the LVIA and amenity assessments, to ensure effects are properly identified and tested.

Broom is a rural settlement with an open relationship to the River Arrow and surrounding farmland, and parts of the village are designated as a Conservation Area. The EIA should include a robust



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Landscape and Visual Impact Assessment (LVIA) to assess effects on landscape character, key views and the setting of the Conservation Area. Given the relatively dark baseline night-time environment at the village edge, the EIA should also assess lighting impacts and set out a sensitive lighting strategy that avoids harm to amenity and ecological receptors.

Security measures (including fencing, CCTV and any security lighting) have potential to introduce engineered/industrial elements into an otherwise rural landscape and to affect both residential amenity and biodiversity (particularly bats and other nocturnal species). SPPC requests that the EIA assesses these effects and that the scheme includes a design-led approach to security (minimising fencing height and visual prominence where possible, using appropriate materials/colour, and limiting lighting through a dark-sky and ecology-sensitive strategy), consistent with the NPPF and relevant Stratford-on-Avon DC Core Strategy policies on landscape character, amenity and the natural environment.

Required by policy:

- NPPF 174, 185
- SDC CS.5
- NDP SP3

4.2 Agricultural Land and Soils (BMV Land)

The Scoping Report acknowledges BMV land but underplays the significance.

Missing / inadequate:

- Quantification of total hectares of Grades 1, 2, and 3a to be lost.
- Assessment of long-term soil degradation under solar arrays.
- Assessment of food security impacts, contrary to NPPF 174(b).
- Assessment of agricultural displacement and rural economy impacts.

Soils and agricultural land classification

The proposals encompass land identified as Agricultural Land Classification (ALC) Grades 2 and 3. SPPC requests that the Applicant provides an up-to-date, site-specific ALC assessment (where not already robustly evidenced) and demonstrates how the scheme has minimised the use of best and most versatile agricultural land, in line with the NPPF and relevant Stratford-on-Avon DC Core Strategy policies. The EIA should also address soil handling and restoration (including for cable trenches and compounds) through an outline Soil Management Plan.

Required by policy:

- NPPF 174(b)
- SDC CS.27
- NDP SP3



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4.3 Public Rights of Way (PRoW)

The Scoping Report fails to recognise the density and importance of PRoW around Dunnington & Wood Bevington and in the parish of Salford Priors.

Missing / inadequate:

- Full PRoW amenity assessment.
- Visual enclosure impacts.
- Loss of rural character and tranquillity.
- Construction-phase diversions and severance.
- Compliance with NPPF para 100.

Required by policy:

- NPPF 100
- SDC CS.26
- NDP SP14

4.4 Ecology and Biodiversity

Although ecology is scoped in, the approach is insufficient.

Missing / inadequate:

- Assessment of raptors (buzzards, red kites, kestrels, owls).
- Assessment of habitat fragmentation across 1,762 ha.
- Assessment of hedgerow loss and severance.
- Assessment of invertebrate decline due to shading.
- Assessment of BESS fire risk to ecology.

Additional ecology matters that must be scoped in:

SSSI (Broom SSSI)

The Scoping Report appears to understate the sensitivity of the Broom SSSI. The proposed cable corridor would run adjacent to the designated site, and construction activity (excavation, plant, construction traffic, dust deposition and temporary access) has potential to result in indirect effects on the SSSI and its qualifying features. SPPC requests that the EIA scope explicitly considers the potential for likely significant effects on the SSSI (direct and indirect) and that Warwickshire County Council Ecology and/or Natural England are consulted on the appropriate survey requirements, avoidance measures, construction environmental management controls (CEMP), and any necessary mitigation/monitoring, in accordance with the NPPF's approach to conserving and enhancing biodiversity and Stratford-on-Avon DC Core Strategy policies on the natural environment.

Otter presence (River Arrow)

The River Arrow is known to support otter (*a European Protected Species*). SPPC considers that a single survey visit is unlikely to provide a robust baseline for a linear river corridor subject to seasonal variation. The EIA should include proportionate, repeat survey effort (including for holts, couches,



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commuting and foraging evidence) across all sections of the river corridor potentially affected by works (including cable installation and any crossings), and should identify avoidance buffers, timing constraints and mitigation, consistent with the NPPF and Stratford-on-Avon DC Core Strategy policies on biodiversity.

River crossings and river-adjacent panel layout

Where cable routes and associated works are proposed to cross the Rivers Arrow and Avon, SPPC expects the EIA to be informed by appropriate baseline ecological surveys for the full corridor of works and all relevant receptors, rather than relying on an assumption of absence. The assessment should identify constraints, apply the mitigation hierarchy (*avoid, mitigate, compensate*), and demonstrate policy compliance with national and local objectives to conserve and enhance biodiversity.

This should include, but not be limited to, amphibians including great crested newt where relevant. Given the presence of ponds within and close to the proposed order limits, the EIA scope should confirm the need for Habitat Suitability Index assessment and, if indicated, further presence/absence and population surveys, together with a robust impact assessment and any licensing/mitigation pathway.

The River Arrow corridor supports a range of species (including waterfowl, fish and invertebrates) indicative of a functioning riparian ecosystem. SPPC considers that the baseline described in the Scoping Report may not adequately reflect current ecological value and sensitivity. The EIA should therefore provide an up-to-date, evidence-based baseline (including aquatic and riparian habitats) and assess potential effects from panel layout adjacent to the river, construction activity, and changes to runoff pathways (including during flood events), with appropriate mitigation and monitoring.

Any proposed river crossings (including stilted structures) have potential to disturb bankside vegetation and riparian habitat, with consequent effects on otter and other species. The EIA should therefore include a clear assessment of construction methodology for crossings, temporary works and access, bank reinstatement proposals, and any necessary buffers and habitat protection measures.

Bats

Local records indicate notable bat activity in the area, particularly along the River Arrow corridor and associated hedgerows/treelines which function as commuting and foraging routes. SPPC requests that the EIA includes proportionate bat survey effort (including activity surveys and assessment of key linear features) and considers emerging evidence on potential effects of solar developments on bats and insect prey availability. The assessment should set out avoidance and mitigation (e.g., retention and strengthening of dark corridors, sensitive lighting design, and habitat enhancements) and demonstrate how biodiversity net gain objectives will be achieved in line with national policy and Stratford-on-Avon DC Core Strategy requirements.

Habitat loss, fragmentation and ecological networks

While panel areas may be set back from some field boundaries, the overall scale and dispersed nature of the proposals implies a substantial construction footprint associated with cable corridors, trenching, joint bays, access and temporary compounds. The EIA should therefore assess habitat loss, fragmentation and disturbance arising from both the generating sites and the interconnection works, including impacts on hedgerows, treelines, field margins and watercourse buffers. The Scoping Report should confirm that survey coverage extends beyond panel fields to all associated works and that mitigation follows the established hierarchy.



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Given the importance of hedgerows and treelines as ecological networks (including for bats), SPPC requests that the Applicant provides accurate mapping and baseline information for all existing linear features, and that landscape/ecology assessments are informed by current topographical and habitat data. This should include clear identification of any features to be removed, gapped-up or strengthened, and how ecological connectivity will be maintained or enhanced.

Ground conditions and piling methodology (relevant to ecology/amenity)

Local ground conditions include sand and marl. Ground-mounted solar typically requires driven piles or other foundations, and the Scoping Report references piling depths of up to 4 metres. SPPC requests that the EIA scope includes proportionate site-specific geotechnical investigation to inform foundation design and to assess potential construction effects (including noise, vibration and ground-borne disturbance) on nearby receptors and sensitive structures (including bridges). The assessment should also consider how ground conditions may influence construction duration, construction traffic movements, and the adequacy of proposed construction management measures, consistent with national policy on protecting residential amenity and ensuring safe and suitable development.

Required by policy:

- NPPF 174(d), 180(a)
- SDC CS.6, CS.7
- NDP SP 11

4.5 Heritage and Archaeology

The Scoping Report underestimates setting impacts.

Archaeology

The area has a well-established archaeological resource, including evidence from prehistoric, Roman and Anglo-Saxon periods, and historic assets associated with the River Arrow and River Avon corridors. The statement sets out key omissions within the applicant's scoping report in relation to the historic environment, specifically concerning the areas of Wood Bevington and Dunnington. These areas are of recognised historical importance, having associations with significant national events, including the Battle of Evesham (1265) and activity during the English Civil War. As such, the scoping report fails to adequately address the potential impacts of the proposed development on heritage assets and their settings.

Given the scale of ground disturbance associated with panel foundations, battery infrastructure and extensive underground cabling, the EIA should include a robust cultural heritage assessment. SPPC considers that this should not rely solely on desk-based assessment, but should include an appropriate programme of non-intrusive and, where necessary, intrusive evaluation (e.g., geophysics and trial trenching) to inform layout, micro-siting and mitigation, in line with the NPPF's heritage policies and relevant Stratford-on-Avon DC Core Strategy policies.

SPPC requests early engagement with Warwickshire County Council's Archaeology/Heritage service and other relevant specialists to agree the scope of evaluation and mitigation, and to ensure that the assessment is proportionate, evidence-led and capable of informing the Examination.



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Failure to Identify and Assess Heritage Significance

The scoping report does not provide a proportionate or evidence-based assessment of the historic significance of Wood Bevington and Dunnington. There is an absence of:

- A robust baseline assessment of designated and non-designated heritage assets within the study area;
- Consideration of archaeological potential linked to nationally significant historic events;
- Evaluation of the contribution of setting to the significance of heritage assets, including landscape context.

This omission conflicts with national policy requirements which require applicants to describe the significance of any heritage assets affected, including the contribution made by their setting.

Missing / inadequate:

The applicant's scoping report is deficient in its treatment of the historic environment and does not meet the requirements of national planning policy.

- Assessment of non-designated heritage assets in the parish of Salford Priors.
- Assessment of historic landscape character.
- Assessment of views to/from heritage assets.
- Assessment of cumulative harm.

Required by policy:

- NPPF 199–208
- SDC CS.8

4.6 Population, Human Health, and Residential Amenity

The Scoping Report proposes to scope out socio-economics, which is unacceptable.

Missing / inadequate:

- Assessment of mental health impacts from loss of landscape, tranquillity, and rural identity.
- Assessment of construction disturbance (noise, dust, HGVs).
- Assessment of long-term visual oppression for residents.
- Assessment of community cohesion impacts.
- Assessment of loss of recreational amenity.

SPPC notes that some residential receptors (a dwelling currently under construction at the former Broom Junction site) do not appear to be shown on the detailed plan. The Applicant should ensure that all sensitive receptors are accurately identified and included within the EIA study area. Given the proximity of panels and associated equipment to the river boundary and nearby dwellings, the EIA should assess construction and operational noise (including inverters/transformers) and vibration effects on residential amenity, and should identify appropriate stand-off distances, screening and controls where necessary, consistent with the NPPF and relevant Core Strategy policies.



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Noise assessment should be based on representative baseline monitoring and should take account of local topography and the open character of the village in relation to the site. The EIA should consider both construction and operational phases (including maintenance activity), and assess cumulative effects where relevant, with clear mitigation and compliance criteria.

If driven piling is proposed, there is potential for significant temporary noise and vibration effects. The EIA should therefore set out the likely foundation methodology, programme and working hours; assess impacts against relevant standards; and identify mitigation (including alternative foundation methods where appropriate, buffer distances, and monitoring/complaints procedures) to protect residential amenity.

Required by policy:

- NPPF 92, 130, 185
- SDC CS.16
- NDP SP 25

4.7 Transport and Access

The Scoping Report underestimates the scale of HGV movements.

Missing / inadequate:

- Full construction traffic modelling.
- Assessment of rural lane suitability.
- Assessment of cumulative traffic with other NSIPs.
- Assessment of NMU safety.
- Assessment of PRow crossings.

The scale of the proposals implies extensive trenching for cabling and associated construction activity, including the movement and storage/disposal of excavated material and imported backfill. The EIA should include a detailed Construction Traffic Management Plan (CTMP) proportionate to the dispersed nature of the works, addressing HGV numbers, abnormal loads, routing, hours of operation, construction compounds, and measures to protect the local highway network.

There are narrow or no footways and on-road parking, with a number of properties fronting directly onto the highway. SPPC considers that construction routing through the settlements could give rise to highway safety risks and unacceptable amenity impacts. The CTMP should therefore demonstrate how HGV routing will avoid unsuitable roads and settlements where practicable, and how residual impacts will be managed.

SPPC requests clarity on the structural capacity and any weight/width restrictions affecting Broom Bridge, and whether it is suitable for construction traffic associated with this project. Pending robust evidence (including any necessary structural assessment and agreement with the Highway Authority), SPPC considers that Broom Bridge should not be relied upon as a construction traffic route.

Construction traffic should avoid constrained crossings and sensitive historic structures where practicable, including Bidford's narrow historic bridge, unless a robust assessment demonstrates suitability and appropriate controls are secured. The CTMP should set out agreed routes and mitigation to prevent damage to highway infrastructure and heritage assets.



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Given the rural road network, watercourses and multiple small bridge crossings in the wider area, SPPC requests that the transport assessment and the CTMP consider the impacts across a sufficiently wide study area. This should include route appraisal, swept-path analysis where relevant, bridge capacity constraints, and pre and post-construction road/structure condition surveys and reinstatement arrangements.

Required by policy:

- SDC CS.26
- NDP SP14

4.8 Hydrology, Flood Risk, and Water Environment

The Scoping Report proposes to scope out several water-related impacts.

Missing / inadequate:

- Assessment of runoff from panel surfaces.
- Assessment of soil compaction and reduced infiltration.
- Assessment of flood risk to downstream villages.
- Assessment of BESS contamination risk.

Flood risk and water environment – further points to scope in

The Scoping Report indicates that a detailed Flood Risk Assessment (FRA) for the River Arrow may not be required because the area is already identified as being at flood risk. SPPC considers that the EIA should nevertheless assess the scheme's potential to alter floodplain function and surface water pathways (including during construction), and the implications for the water environment. This should include an up-to-date FRA and supporting drainage strategy proportionate to the scale and linear extent of the proposals, taking account of existing flood defences and any observed changes in flood behaviour locally.

Local evidence suggests that flood behaviour in the vicinity has been influenced by existing flood defences, with potential redistribution of floodwater to adjacent land. The baseline used for the EIA should therefore be updated to reflect current conditions, and the assessment should consider any risk of increasing flood depth, velocity or duration elsewhere (including downstream effects), in line with national policy requirements for managing flood risk.

The EIA should assess potential impacts on water quality arising from construction and operational phases, including mobilised sediments, contaminated runoff, debris and pollution incidents, and the consequent effects on protected and notable species associated with the River Arrow.

SPPC considers that a clear pollution prevention approach and construction controls should be secured through a CEMP and a Water Framework Directive-informed assessment where relevant.

Required by policy:

- NPPF 159–169
- SDC CS.6



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4.9 Glint and Glare

The Scoping Report includes glint and glare but lacks detail.

Missing / inadequate:

- Assessment of impacts on:
 - Residential properties
 - Road users
 - PRow users
 - Aircraft and emergency services
- Assessment of cumulative glare across 1,762 ha.

The reflective characteristics of solar arrays can give rise to glint and glare effects. SPPC requests that the EIA includes a formal glint and glare assessment covering likely sensitive receptors, including nearby residential properties, road users and aviation interests (including any relevant local airfield operations). The assessment should identify worst-case scenarios, demonstrate compliance with relevant guidance, and set out mitigation (including layout/micrositing, screening and surface specifications) where effects could be significant.

4.10 Major Accidents and Disasters (BESS Fire Risk)

The Scoping Report proposes to scope out major accidents and disasters.

This is not acceptable.

Missing / inadequate:

- Thermal runaway modelling.
- Toxic plume dispersion modelling.
- Fire service access and water supply assessment.
- Assessment of explosion risk.
- Assessment of community evacuation scenarios.

Required by policy:

- NPS EN-1 (safety)
- NPPF 97 (resilience)

5. Cumulative Effects

The Scoping Report's cumulative assessment is inadequate.

Missing / inadequate:

- Other solar farms in Warwickshire/Worcestershire.
- Grid reinforcement projects.
- Battery storage schemes.
- Transport cumulative impacts.



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- Landscape cumulative industrialisation.

6. Conclusions and Requests to PINS

Salford Priors Parish Council respectfully requests that PINS instruct the Applicant to:

1. Expand the scope of the ES to include:

- Full LVIA including all villages and PRoW.
- Full agricultural land assessment including BMV quantification.
- Full PRoW amenity and tranquillity assessment.
- Full human health and wellbeing assessment.
- Full heritage setting assessment.
- Full hydrology and flood risk modelling.
- Full glint and glare modelling.
- Full BESS fire and explosion risk assessment.
- Full cumulative impact assessment.

2. Require explicit assessment against:

- NPPF
- SDC Core Strategy
- Salford Seven NDP
- NPS EN-1, EN-3, EN-5

3. Require additional baseline surveys

Including ecology, landscape, heritage, traffic, hydrology, and soil surveys.

4. Require meaningful community engagement

Given the scale of local impact.

Final Statement

The Arrow Valley Solar NSIP is of unprecedented scale for this rural area. The Scoping Report, as submitted, does not provide a sufficiently robust foundation for an Environmental Statement that meets statutory requirements or reflects the realities of local impact.

SPPC therefore urges PINS to require a substantially expanded scope to ensure that the environmental, social, landscape, agricultural, and community impacts are fully and transparently assessed.

Issued by: Salford Priors Parish Council

Date: 26th April 2026

From: [REDACTED] <clerk@southlitleton.org.uk>
Sent: Saturday, April 25, 2026 23:55
To: Arrow Valley Solar <ArrowValleySolar@planninginspectorate.gov.uk>
Subject: EN0110033 Arrow Valley Solar EIA Consultation Response

The Council currently has objections to offer for the Scoping Opinion.

It is widely understood that the South Littleton Site is prone to annual flooding and high southerly winds. It is possible that a strong storm could leave this site, so close to the village, in ruins and perhaps create a dangerous situation for parishioners.

There are four sites scattered across an area covering several miles. Most of the proposed panel sites do not impact housing. In the case of South Littleton this is not the case. This large-scale fenced solar field near the centre of the village would be an industrial eyesore not in keeping with a pastoral rural housing area such as South Littleton. Not including the 24-house site with planning approval, there are approximately 40 existing homes and some businesses along Clevedon Green and Shinehill Lane which would be near adjacent to the site.

The proximity to the rural village could potentially bring a negative impact to the local residents. A rural village such as South Littleton benefits from almost no light or noise pollution during the evening. Solar farms can produce light levels of noise from inverters. Whilst this may be negligible, it would pose a negative impact on such a quiet community, especially for the residents in close proximity of the proposed site.

It is too early to confirm whether or not large-scale solar farms pose a risk for the health & wellbeing of people living in their proximity. We have concerns that risks of their impact have not as yet been confirmed/ sufficiently studied & need to ensure that our community does not suffer from any consequences.

For the above reasons the Council believes South Littleton is an inappropriate site for such a solar panel project.

Regards

[REDACTED]
Clerk
SLPC
38 Pollard Court, Basin Road
Worcester
WR5 3GB

[REDACTED]

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Arrow Valley Solar Farm

Nationally Significant Infrastructure Project

Response from Stratford-on-Avon District Council

April 2026

Contents

- 1.0 Introduction
- 2.0 Summary of proposed development
- 3.0 Policy context
- 4.0 Commentary on proposed ES scope
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 - 4.10 Population and human health
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- 5.0 Other matters

1.0 Introduction

The Planning Inspectorate is consulting stakeholders, including Stratford-on-Avon District Council, on the Scoping Report in order to inform and influence the process of Environmental Impact Assessment in relation to the Arrow Valley solar project.

Stratford on Avon District Council has reviewed the Scoping Report and have identified key issues which may be of concern to the Council, or where additional information is required.

Whilst the District Council has a good general understanding of the various issues we defer to Warwickshire County Council for expertise on specialist topics such as ecology and highways. Internal and external consultees have been consulted for their expertise where appropriate and their comments have been included within the comments below.

Overview

Arrow Valley Solar intend to create a proposed solar photovoltaic (PV) electricity generating facility with a capacity greater than 50 megawatts (MW) on land west of

Bidford-on-Avon. There are 4 parcels selected with cable route corridors between these sites, along with a point of connection near Feckenham in Worcestershire.

Planning process

The project falls within the Planning Act 2008 definition of a Nationally Significant Infrastructure Project, as the construction of a generating station with a capacity of more than 50MW. The proposal is currently proposed to generate up to 500MW of electricity. Arrow Valley solar are preparing an application for a Development Consent Order (DCO) to the Secretary of State for determination in accordance with the Act.

2.0 The proposed development

The Development is likely to include the following infrastructure:

- (1) Solar PV (photo-voltaic) modules
- (2) Sub-distribution switch rooms
- (3) Conversion units
- (4) Storage containers
- (5) Substations
- (6) BESS (Battery Energy Storage System)
- (7) Fencing and security
- (8) Lighting
- (9) Mitigation and enhancement area
- (10) On-site cables
- (11) Grid connection cables
- (12) Site access and access tracks
- (13) Landscape and ecological mitigation and enhancement area
- (14) Temporary construction compounds

Programme

Construction works are currently anticipated to last approximately 24 months. The operational lifespan is expected to be up to 60 years with decommissioning taking place after this period of time.

3.0 Policy Context

This scoping consultation relates to a Nationally Significant Infrastructure Project (NSIP) looking to install a ground-mounted solar photovoltaic (PV) generating station with a capacity in excess of 100MW. The proposed development includes solar array areas and associated development including energy storage, grid connection infrastructure, and other infrastructure integral to the construction, operation, maintenance and decommissioning of the development.

This NSIP is currently at the pre-application stage which involves consultation with relevant bodies and organisations. As a host body, Stratford-on-Avon District Council has been asked to inform the Planning Inspectorate of any information it considers should be provided within the Environmental Statement.

Before consideration, NSIPs are required to submit an environmental statement which will set out potential impacts of the proposed development on the environment. The applicant has already set out its proposed scope of the ES, however due process requires relevant 'consultation bodies' to be consulted.

National Policy

The NPPF is a material consideration, and there are relevant national policy statements (EN1, EN3 and EN5) in particular EN3 deals with renewable energy infrastructure (EN3) 2025 and provides guidance on general assessment and technology specific information.

Development Plan

The Development Plan within Stratford-on-Avon District consists of the adopted Core Strategy (2016) and relevant to the site, the adopted Bidford-on-Avon and Salford Priors Neighbourhood Development Plans.

The Core Strategy was adopted in 2016, and covers the period of 2011-2031. As set out within strategic objective 5, the vision for the plan was that *'the District will have reduced its greenhouse gas emissions, so as to contribute to the national target for reduction, through a range of measures such as the location and design of development, provision of renewable and low carbon energy schemes, and promoting opportunities for low carbon travel.'* Whilst this is a pertinent objective in relation to the proposed scheme, the plan also seeks to maintain and enhance both the rural character of the district and its historic character. Policies considered particularly relevant to the proposed scheme are discussed in detail within Appendix 1 of this document.

Of particular importance is Core Strategy policy **CS.3** (Sustainable Energy) which supports renewable and low carbon energy generation, and states that *'provision will be made for a range of renewable energy and low carbon generation within the District to maximise environmental, social and economic benefits whilst minimising any adverse local impacts.'* The policy then goes on to state that *'where large scale low carbon and/or renewable energy projects are proposed that serve national, regional or county interest, but the majority of the effects will be felt locally, the Council will support such schemes where the impacts are, or can be, made acceptable.'* The Arrow Valley proposal would be of national interest and as such the council are supportive only in the instance that the impacts can be made acceptable.

Particular aspects of Policy CS.3 that garner attention include the effects on Listed Buildings, Areas of Restraint, Special Landscape Areas, Conservation Areas, the Cotswolds Area of Outstanding Natural Beauty (AONB), or other nationally designated and non-designated heritage and cultural asset. The policy highlights that *'the objective of [such] designation must not be compromised by the development'*. The environmental statement will therefore need to consider the impact on each of the above designations to ensure that the objective of the designations is not compromised. The policy also highlights the sensitivity of the Cotswold National Landscape, and highlights that proposals *'within and adjacent to the Cotswolds AONB large scale wind or solar farms are unlikely to be appropriate.'* It is noted that the scheme is over 4.5km from the Cotswold National Landscape (CNL) at its closest point, however intervisibility is likely from the CNL and as such needs to be carefully assessed to determine its impacts. Careful consideration of these matters is expected within the ES.

Section B of Policy CS.3 focuses solely on Solar Energy, and again, is supportive providing impacts can be made acceptable. The following issues however, are considered to be of particular local significance and it is expected that the Environmental Statement addresses each of these in full:

- Impact on agricultural activities and disturbances to agricultural land.
- Impact on the openness and character of the landscape and on visual amenity.
- Impact on the character of the historic landscape.
- Impacts of trees and other vegetation which may cause overshadowing, making allowance for their future growth.
- Impact on and opportunities to enhance biodiversity.
- Impact of direct and reflected lighting (including glare) on the amenity of occupied affected buildings or land on light pollution, on aviation and on biodiversity (particularly bats).

The Environmental Statement should also have regard to the Council's [Renewable Energy Landscape Sensitivity Assessment](#). Table 1 contained within Appendix 1 outlines the sensitivities to Solar Developments for each of the landscape areas relevant to the scheme.

Neighbourhood Development Plans

It is noted that the scheme falls within the Neighbourhood Areas of two areas that have adopted Neighbourhood Plans, these being the [Bidford-on-Avon NDP](#) and the [Salford Priors NDP](#).

It is considered that the ES should refer to the policies contained within these development plan documents and demonstrate how relevant policies have been considered.

South Warwickshire Local Plan

Stratford-on-Avon and Warwick District Councils are currently working jointly to prepare a new Local Plan for the two District Areas. This plan, once adopted will supersede the existing Core Strategy. The SWLP will shortly be undertaking its Regulation 19 consultation which will present the proposed growth strategy and accompanying policies. The Regulation 19 Consultation is scheduled to take place in June/July, and as such the document and proposals contained within will be publicly available around this time. It is considered that the ES should refer to the policies contained within this publication document and address accordingly.

Two aspects of the Regulation 19 consultation it considered pertinent to the Arrow Valley Proposals will be the proposed growth strategy, and updated evidence base for Special Landscape Areas.

As outlined within the Regulation 18 Consultation, Bidford-on-Avon falls within an identified Priority Area for growth, as such development is being considered within this area. The applicant may wish to refer to the published growth strategy during the consultation to identify if there are overlaps with the Underground Cable Route Corridor Area of Search and proposed allocations.

It is also noted that work is currently underway to review the Special Landscape Areas within the District. As discussed above, the proposals fall in part within the Arden Special Landscape Areas. The applicant may wish to refer to the evidence when published to determine whether there have been any amendments to the boundary of the existing SLA.

The Renewable Energy Technical Evidence and South Warwickshire Local Plan: Climate Evidence Renewables and Decentralised Energy Opportunities Rev.5 (07 May 2024) is also of relevance.

Policy Conclusion

The Arrow Valley Solar Nationally Significant Infrastructure Project is a Renewable Energy scheme that would fall in part within Stratford-on-Avon District Council's boundary. Existing Policy identifies support for renewable energy schemes on the basis that any impacts can be mitigated or otherwise justified. The next stage of this project is for the Planning Inspectorate to issue a Scoping Report which outlines the scope and level of detail that an Environmental Statement must include. As a relevant consultation body Stratford-on-Avon District Council has been asked to identify what it considers should be provided within the ES. Stratford-on-Avon District Council has, in this response, considered the submitted Arrow Valley EIA scoping report, and identified relevant information it considers also needs to be addressed within the ES.

4.0 Commentary on proposed ES scope

4.1 The scoping report proposes to scope out:

- Waste and Materials
- Major Accidents and Disasters
- Socio-Economics
- Air Quality
- Climate Vulnerability
- Water Environment and
- EMF

Taking these in turn:

- Waste and Materials

I defer to Warwickshire County Council's County Planning Unit for their expertise in this area.

- Major Accidents and Disasters

Considering the type of development proposed and consideration of other factors such as glint and glare in other section of the ES, the District Council considers that Major Accidents and Disasters may reasonably be scoped out of the Environmental Impact Assessment. The applicant must commit to providing any necessary mitigation to manage risks identified as part of the process.

- Socio-Economics

The District Council considers that Socio-Economic impacts may reasonably be scoped out of the Environmental Impact Assessment subject to this being adequately dealt with as part of the planning process.

- Air Quality

The Council's Environmental Health officer agrees that the principal air quality impacts associated with the proposed development are likely to arise from construction-phase dust emissions, particularly given that the scheme is spread across several locations.

Operational impacts on air quality are expected to be negligible, and there are no Air Quality Management Areas within Stratford District in close proximity to the site.

However, an application may have significant adverse environmental effects that require mitigation; such effects will be identified in the accompanying ES and/ or relevant environmental information. Any mitigation measures relied upon in the ES must be capable of being delivered, often through relevant management plans such as a Code of Construction Practice, or a Construction Environmental Management Plan and/or a Site Waste Management Plan. These mitigation measures must be appropriately secured, and this will generally be achieved through the requirements in the DCO.

Requirements can impose an obligation on the applicant to seek approval of final details of the proposed development prior to construction. These should typically be drafted such that they are not tailpiece requirements which simply provide for their own variation, but at the same time should not prevent the discharging authority from approving details which would lead to environmentally better outcomes where appropriate.

On this basis, it is considered that air quality effects can be satisfactorily addressed through a Construction Environmental Management Plan secured by condition, and that air quality may reasonably be scoped out of the Environmental Impact Assessment.

- Climate Vulnerability

As climate change is scoped in and dealt with elsewhere within the ES the Council considers that climate vulnerability may reasonably be scoped out of the Environmental Impact Assessment.

- Water Environment

I defer to Warwickshire County Council's Flood Risk Management team for their expertise.

Based on an assessment of the scoping report whilst the majority of the proposed site lies within Flood Zone 1, though parts extend into Flood Zones 2 and 3. NPPF Annex 3: Flood Risk Vulnerability Classification, places the proposed use of a Solar Farm as 'essential infrastructure'. However, as the development site crosses various Flood Zones (1, 2 and 3) Table 2: flood risk vulnerability and flood zone incompatibility states that an exception test is required. The NPPG states that for nationally or regionally important infrastructure the area of search to which the Sequential Test could be applied will be wider than the local planning authority boundary. A site-specific flood risk assessment will be required at a minimum, and should consider how the development can remain operational during times of flooding.

- EMF

Subject to adequate mitigation measures being considered and proposed EMF may reasonably be scoped out of the Environmental Impact Assessment.

The scoping report proposes to scope in the following matters:

4.2 Ecology and Biodiversity

As a District Authority Stratford on Avon District Council refers to Warwickshire County Council's comments in regards to the scope of the assessment in relation to ecology and biodiversity.

The Development Requirements SPD Part N (Biodiversity and Green Infrastructure) and Part V (Climate Change Adaptation and Mitigation) is also a material consideration.

Another material consideration is also policy SP5 of the Salford Priors NDP which is of relevance as it requires that there are no significant adverse impacts on wildlife.

In terms of those elements proposed to be scoped out the Council would request that the relevant search areas for statutory and non-statutory designated sites is fully justified.

With respect to individual species such as bats, badgers and birds the Council also require the search area to be justified, further noting that these species are mobile.

Reference should also be made to the requirements of Salford Priors NDP policy SP11 and Policy ENV10 of the Bidford-on-Avon NDP.

4.3 Ground conditions and contamination

Ground contamination has been scoped into the EIA, and the Council's Senior Environmental Health Officer agree that human health impacts should remain scoped in, as identified in Table 7-5.

DMRB LA 109 is appropriate for identifying and assessing land quality effects at a strategic, high-level for the purposes of the EIA. However, it is not sufficient as a standalone methodology for the assessment of contaminated land risks.

Any detailed contaminated land assessment should therefore be undertaken in accordance with Land Contamination Risk Management, BS 10175, and relevant Environment Agency guidance. DMRB LA 109 should be used only to structure reporting and determine significance within the EIA, and not as a substitute for established contaminated land risk assessment guidance.

As a District Authority Stratford on Avon District Council also refers to Warwickshire County Council's expertise in regard to the scope of the assessment in relation to County Planning.

4.4 Soils and agriculture

Consideration should be made to Bidford NDP which contains policy ENV.6 (Protection of the Best and Most Versatile Agricultural Land) which should be taken into account.

In addition, Salford Priors NDP contains policy SP.12 which is seeks to 'Protect the Best and Most Versatile Agricultural Land'.

Consideration should also be given to IEMA Guide 'A new perspective on land and soil in EIA'.

NPPF Paragraph 187 and Core Strategy Policy AS.10 refer to the protection of the best and most versatile agricultural land. From an agricultural land perspective, the policy above seeks to conserve and minimise the loss of extensive area high quality arable farmland. Agriculture is the main land use within the site area. This vital resource is coming under increasing pressure from 'renewables' development proposals and this cumulative pressure should be seriously considered when making a decision to grant applications on high value agricultural land. Policy at all levels is very clear and states 'where significant development is unavoidable, preference will be given to the use of

poorer quality agricultural land in preference to higher quality land'. Care should also be taken to avoid damage or disturbance to soils of high environmental value and other soils that contribute significantly to ecosystem services. Looking at the Defra Agricultural Land Map this shows that the proposal area is predominantly in grade 1-3 agricultural land and as such, the national and local policy constraints associated with the loss of best and most versatile land would be applicable. The loss of this land will need require further consideration (potentially including the consideration of alternatives or exclusions) in line with national and local policy, to conserve and minimise the loss of the extensive high quality arable farmland. Alternatively the site area could be reduced to remove some of the best and most versatile agricultural land. The scoping report should identify how

The NPS states that 'where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land avoiding the use of "Best and Most Versatile" agricultural land where possible. 'Best and Most Versatile agricultural land is defined as land in grades 1, 2 and 3a of the Agricultural Land Classification (ALC)'.

With respect to magnitude the loss of land by sealing of land quality can downgrade the effects. In particular the anticipated siting of the BESS would need to be considered. Due to the high grade of the agricultural land within the site area has a national significance and the scoping report should consider this fully.

The Council also requires that the site search area includes all of the boundaries of the site.

4.5 Climate Change

Core Strategy policy CS.2 requires proposals for development to demonstrate that, dependent on their scale, use and location, measures are included that mitigate and adapt to the impacts of climate change. Full details of the proposed adaptation measures should be incorporated into the proposal. At a strategic level, measures to mitigate the impacts of climate change will include:

- Directing development to sustainable locations.
- Locating development in a manner which minimises the need to travel and encourages other forms of sustainable transport such as cycling, walking and the use of public transport.
- Designing development to reduce carbon emissions and make efficient use of natural resources.
- Promoting decentralised low carbon and renewable energy schemes.

In order that development proposals adapt to climate change, measures will include:

- Flood prevention and mitigation measures
- Heating and cooling
- Green Infrastructure and Biodiversity

Core Strategy CS.3 also supports a range of renewable energy and low carbon generation within the District to maximise environmental, social and economic benefits whilst minimising any adverse local impacts. The overarching aim is that the overall balance of outcomes from such projects should be positive for local communities. This would need to be demonstrated.

The Development Requirements SPD Part V (Climate Change Adaptation and Mitigation) is a material consideration and Policy SP5 of the Salford Priors NDP (Sustainability and Renewable Energy) is also of relevance.

The District Council has also issued a climate change emergency to work towards becoming a carbon neutral organisation by 2030.

4.6 Transport and access

As a District Authority Stratford on Avon District Council refers to Warwickshire County Council's comments in regard to the scope of the assessment in relation to transport and access arrangements.

Of material consideration is also the Development Requirements SPD parts C and O which relate to Access and Connectivity and Parking and Travel respectively. SP15 (Car Parking) of Salford Priors NDP is also of relevance.

Due to the presence of the A46 which is a trunk road which dissects the site the Council would also defer to National Highways.

As the proposed site is in a rural area I refer to the comments within the NPS which states that 'access for the delivery of solar arrays and associated infrastructure during construction can be a significant consideration for solar farm siting'. The impact of the access arrangements must be fully justified within the scoping report.

4.7 Noise and vibration

A material consideration is policy SP5 of the Salford Priors NDP is of relevance. SP5 states that Large-scale commercial renewable energy installations, such as wind turbines and solar farms, will only be supported where the proposal can demonstrate, individually, and cumulatively:

- a) The proposal does not adversely affect residential amenity;
- b) The visual impact does not adversely affect the rural and historic character and landscape of the parish;
- c) The noise impact is no greater than current noise levels within all inhabited areas of the parish;
- d) The land will be returned to its original use (i.e. agricultural) if the installation is removed. This should be made a condition of the planning permission;
- e) There are no significant adverse impacts on wildlife; and
- f) The installation does not affect a Listed Building or a Conservation Area and their setting. That any new pylons or substations required meet all of the above criteria.

The Council's Environmental Health Officer has considered the scoping report and agrees with the scoping conclusions presented in Table 11-7, and with the inclusion of sound and vibration within the EIA.

With regard to operational noise from fixed plant, whilst BS 4142:2014+A1:2019 is an appropriate methodology for assessing the significance of noise from sources such as battery energy storage systems and transformers, I do not agree with the use of the qualitative magnitude descriptors set out in Table 6-6. These descriptors may overstate

or understate the significance of effects if applied without due consideration of local context, baseline sound environment, and receptor sensitivity.

In addition, where BESS units and transformers are located in proximity to noise-sensitive properties, an assessment of low-frequency noise is expected. This should include consideration of audibility at receptors, for example through benchmarking against the NANSR 45 audibility threshold or other equivalent appropriate guidance.

4.8 Landscape and visual impact

Of relevance are policy SP5 (Sustainability and renewable energy) of the Salford Priors NDP and policy ENV1 (Renewable and Low Carbon Energy) of the Bidford-on-Avon NDP. The requirements of these policies must be incorporated into the assessment.

Parts B (Achieving Good Design), C (Character and Local Distinctiveness) and M (Landscape Design and Trees) of the Development Requirements SPD are also material considerations and must be taken into account during the scoping process. In particular Part B of The Development Requirements SPD sets out the character areas for the District. Warwickshire Landscape Guidelines and the Arden Landscape requirements must be considered within the scoping.

The findings of the Council's Landscape Sensitivity Study 2012 and Renewable Energy Landscape Sensitivity Study (White Consultants) July 2014 should also be incorporated into the scoping report.

An assessment of the landscape and visual effects of the proposed infrastructure should be undertaken in accordance with the guidance set out in Section 5.10 of EN-1.

With respect to trees and hedgerows a survey in accordance with BS5837 (2012) must be incorporated. The findings of which should be shown to have informed the design, layout and access to maximise retention of the best of the surveyed elements. In terms of hedgerows, ecological, cultural and historic information will need to be submitted (so as to be able to assess hedgerows against the criteria set by the Hedgerow Regulations 1997).

A review of the Landscape and visual impact part of the scoping report has been carried out with the full response contained within Appendix 2 of this response.

Based on the review of the EIA Scoping Report and supporting documentation, the following recommendations are made to ensure the subsequent Environmental Statement (ES) is robust and compliant:

- **Expansion of Study Area:** The study area for the assessment of landscape and visual effects should be increased from 3km to 5km from the outer limits of the Scheme. This is essential to account for the undulating topography and the potential for significant effects on highly sensitive receptors within the Cotswolds National Landscape and the Arden Special Landscape Area.
- **Provision of ZTV Mapping:** The Applicant must provide Zone of Theoretical Visibility (ZTV) mapping to Stratford-on-Avon District Council to justify the selection of viewpoints and related visual receptor groups. This should include both 'bare-earth' and 'with barriers' scenarios, with distinct projections for the varying heights of the solar arrays, BESS, and the substation.

- Methodological Realignment with GLVIA3: The Applicant should submit a detailed Methodology Statement for agreement. This must move away from generic matrices and explicitly demonstrate how susceptibility and value are combined to determine sensitivity, and how size/scale, duration, and reversibility inform the magnitude of effect.
- Terminology Correction: The methodology must be updated to distinguish between "impact" (the action) and "effect" (the result), ensuring the assessment focuses on the magnitude of effect in accordance with standard GLVIA3 practice.
- Provision of Visualisations: The number and location of photomontages must be agreed upon with Stratford on Avon District Council following the review of the 5km ZTV.
- Year 15 (Summer) photomontages should be provided to demonstrate the effectiveness of proposed mitigation planting at maturity, the locations of which to be agreed at a later date, while the requirement for photomontages regarding the Cable Route Corridors (CRCs) should remain reserved until the final routes and the extent of required vegetation clearance is confirmed

4.9 Historic Environment

Of relevance policy SP1 (Protecting the Historic Environment), SP2 (Buildings of Local Importance) and SP5 (Sustainability and Renewable Energy) of Salford Priors Parish NDP must be taken into account during the scoping. Policy ENV8 (Designated Heritage Assets) of the Bidford-on-Avon NDP is also relevant.

Built Heritage

On behalf of the Council an assessment has been made in relation to the scoping report and the built heritage; the full document can be found in Appendix 3. In summary, the following recommendations for the ES can be summarised as:

- It is recommended that the scope of assessment is reviewed beyond the 1km Study Area to confirm whether all likely significant effects have been captured, particularly in relation to highly designated heritage assets located between 1–2km of the Order Limits, or to provide further justification for their exclusion.
- The scope of assessment should be refined through cross-referencing with a Zone of Theoretical Visibility to help confirm the proportionality of the Study Area and identify assets where intervisibility with the Scheme may warrant further assessment.
- The scope of Non-Designated Heritage Assets should be refined to clearly differentiate between archaeological assets and built heritage assets, avoiding duplication in the HER data and ensuring a clear and proportionate scope of assessment.
- The assessment methodology should make some minor refinements to provide greater clarity on definitions of value and magnitude of change.
- It is recommended that the scope of the heritage assessment is reviewed and agreed with Stratford-on-Avon District Council and Historic England during consultation and in advance of submission.

Archaeology

With regards to the impact of the development on archaeology an assessment has been undertaken and can be found in Appendix 4. In summary the proposed scope set out within the Scoping Report provides a reasonable basis for assessment in principle. However, further clarification is required to ensure that the Environmental Statement (ES) is supported by a proportionate and robust evidence base.

The ES should ensure that:

- the assessment is informed by a comprehensive and up-to-date evidence base at the point of submission;
- a proportionate and robust programme of pre-application evaluation is undertaken to support assessment of likely significant effects;
- the scope of assessment remains responsive to new information;
- reliance on post-consent mitigation alone is avoided; and
- consultation with relevant archaeological advisors and Historic Environment Record (HER) data is clearly evidenced.

The ES should be supported by a robust and comprehensive archaeological baseline, including:

- a completed Desk-Based Assessment (DBA) drawing on up-to-date HER data;
- review and synthesis of relevant archaeological investigations within and around the Site;
- geophysical survey results where appropriate;
- aerial photography and LiDAR analysis;
- consideration of Historic Landscape Characterisation (HLC), where relevant; and
- a combination of intrusive (e.g. test trenches and boreholes) and non-intrusive (e.g. geophysical survey, fieldwalking) evaluation.

In conclusion the proposed scope provides an appropriate basis for assessment in principle. However, further clarification is required to ensure that the ES is supported by a proportionate and robust evidence base.

In particular, the ES should ensure that:

- the assessment is informed by a robust and complete archaeological baseline;

- a proportionate and targeted programme of pre-application evaluation supports assessment of likely significant effects;
- uncertainty is clearly identified and addressed;
- likely significant effects are not scoped out prematurely; and
- mitigation is supported by clear evidence and not relied upon in place of assessment.

In particular, the ES should ensure that:

- the assessment is informed by a robust and complete archaeological baseline;
- a proportionate and targeted programme of pre-application evaluation supports assessment of likely significant effects;
- uncertainty is clearly identified and addressed;
- likely significant effects are not scoped out prematurely; and
- mitigation is supported by clear evidence and not relied upon in place of assessment.

4.10 Population and human health

Policy AM1 (Protecting and Enhancing Health Opportunities) of the Bidford-on-Avon NDP is relevant.

With respect to PROW within or close to the site, policy SP14 (Footpaths and Cycleways) of Salford Priors NDP is also relevant.

4.10 Glint and glare

Core Strategy policy CS.3(B) requires the Impact of direct and reflected lighting (including glare) on the amenity of occupied affected buildings or land on light pollution, on aviation and on biodiversity (particularly bats) to be considered.

In terms of the impact of glint and glare on aerodromes the Council request that the distance is justified on a case by case basis when taking into account all necessary factors such as their sensitivity.

In terms of the scoping report the Council raises concerns with the impact on dwellings, PROW and roads being scoped out of the assessment and raises the following points:

- 1km study area for ground based receptors should be extended or assessed and justified on a case by case basis, particularly due to topography or other factors that result in an impact on how the glint and glare from the development could be harmful.
- In relation to road sensitivity the Council note that the A46 runs through the site. These road users could have a high sensitivity to the glint and glare from the

development. Due to the number of road users and speed of the traffic the assessment of the glint and glare on road safety is key.

- The impact on separate dwellings must be undertaken on a case by case basis in order to safeguard residential amenity. Assessment of the impact on dwellings must be completed within an agreed search area. The Council note that this is proposed to be completed on a desk based assessment which we raise concern with as this does not take into account up to date on-site factors which could influence the impact on amenity.

4.11 Cumulative impact

In terms of the cumulative impact the Council notes that a number of planning applications have been approved close to and within the site area; the Council welcomes that these developments will be taken into account.

One concern to raise is that the level of assessment should be commensurate with the scale of the development rather than proportionate to the level of information available.

The District Council welcomes that no elements of the cumulative impacts are scoped out at this stage due to the level of uncertainty with the associated impacts.

5.0 Final Comments

It is particularly important that all the views expressed by the technical/additional consultees are considered in full and taken into account in the formulation of the ES.

Presentation of the Environmental Statement

Generally speaking, the Environmental Statement should be concise and clear in its presentation. It should report on all the impact assessments detailed in this Scoping Opinion.

Details of the processes and methodologies used for the collection of baseline data, predictions and assessment of impacts should be clearly set out. Justification for how the Environmental Statement has shaped the design and the implementation plan of the development proposals should also be stated.

The ES should include a list of references used and a glossary of technical terminology used. A list of consultee's consulted should be provided with a summary of their representations. Key mitigation measures should be highlighted and their effectiveness explained.

A non-technical summary of the Environmental Statement should also be provided including any relevant plans and diagrams.

It is recommended that relevant individuals, organisations and groups affected by the proposal be notified of the existence of the Environmental Statement.

PLANNING NOTIFICATION

Date: 10 April 2026

To: Planning Policy

Application(s) reference: 26/00866/NSIPCO

Proposed : Application by Arrow Valley Solar Limited (the applicant) for an Order granting Development Consent for the Arrow Valley Solar (the proposed development)

At : Arrow Valley Solar

For : Arrow Valley Solar Limited

The above consultation has been received.

Comments due by : 22 April 2026 (due to PINS set deadlines)

Case Officer: [REDACTED]

Tel: [REDACTED] E Mail: planning.applications@stratford-dc.gov.uk

This is to advise you that the District Planning Authority is in receipt of a DCO scoping consultation request from the Planning Inspectorate for the above development which lies within Stratford-on-Avon District.

The District Council is a consultee on the DCO application and the scoping process.

A copy of the documents relating to this application can be found on: [E-Planning](#)

Please search the planning applications section under reference number for details.

Please submit your comments/observations to me no later than 22 April 2026

Reply

Context

This consultation relates to a Nationally Significant Infrastructure Project (NSIP) looking to install a ground-mounted solar photovoltaic (PV) generating station with a capacity in excess of 100MW. The proposed development includes solar array areas and associated development including energy storage, grid connection infrastructure, and other infrastructure integral to the construction, operation, maintenance and decommissioning of the development.

This NSIP is currently at the pre-application stage which involves consultation with relevant bodies and organisations. As a host body, Stratford-on-Avon District Council has been asked to inform the Planning Inspectorate of any information it considers should be provided within the Environmental Statement.

Before consideration, NSIPS are required to submit an environmental statement which will set out potential impacts of the proposed development on the environment. The applicant has already set out its proposed scope of the ES, however due process requires relevant 'consultation bodies' to be consulted.

Development Plan

The Development Plan within Stratford-on-Avon District consists of the adopted Core Strategy (2016) and relevant to the site, the adopted Bidford-on-Avon and Salford Priors Neighbourhood Development Plans.

Core Strategy

The Core Strategy was adopted in 2016, and covers the period of 2011-2031. As set out within strategic objective 5, the vision for the plan was that "the District will have reduced its greenhouse gas emissions so as to contribute to the national target for reduction through a range of measures such as the location and design of development, provision of renewable and low carbon energy schemes and promoting opportunities for low carbon travel." Whilst this is a pertinent objective in relation to the proposed scheme, the plan also seeks to maintain and enhance both the rural character of the district and its historic character. Policies considered particularly relevant to the proposed scheme are discussed below.

CS.2 Climate Change and Sustainable Construction, seeks to ensure development mitigates and adapts to climate change, with measure to achieve this including the promotion of decentralised low carbon and renewable energy schemes. This proposal for solar energy generation accords with the principles of CS.2. However, also considered under CS.2 is the opportunities for green infrastructure and biodiversity. The policy outlines that proposals should "maximise opportunities for multiple benefits of green infrastructure as an integral part of development" and "ensure the biodiversity and natural habitats are resilient to the predicted effects of climate change by safeguarding and enhancing existing habitats and through the creation and management of additional habitats". To accord with policy CS.2 it is considered that the ES will need to consider how Green Infrastructure will be embedded within the scheme, and how the scheme intends to support existing biodiversity and natural habitats on the site, particularly in light of the requirements of NSIPS to deliver a 10% Biodiversity Net Gain.

CS.3 Sustainable Energy supports renewable and low carbon energy generation, and states that 'provision.will.be.made.for.a.range.of.renewable.energy.and.low.carbon.generation.within.the.District.to.maximise.environmental?social.and.economic.benefits.whilst.minimising.any.adverse.local.impacts.' The policy then goes on to state that 'where.large.scale.low.carbon.and-er.renewable.energy.projects.are.proposed.that.serve.national?regional.or.county.interest?but.the.majority.of.the.effects.will.be.felt.locally?the.Council.will.support.such.schemes.where.the.impacts.are?or.can.be?made.acceptable.' The Arrow Valley proposal would be of national interest and as such the council are supportive only in the instance that the impacts can be made acceptable.

Particular aspects of Policy CS.3 that garner attention include the effects on Listed Buildings, Areas of Restraint, Special Landscape Areas, Conservation Areas, the Cotswolds Area of Outstanding Natural Beauty (AONB), or other nationally designated and non-designated heritage and cultural asset. The policy highlights that 'the.objective.of.[such].designation.must.not.be.compromised.by.the.development'. The environmental statement will therefore need to consider the impact on each of the above designations to ensure that the objective of the designations is not compromised. The policy also highlights the sensitivity of the Cotswold National Landscape, and highlights that proposals 'within.and.adjacent.to.the.Cotswolds.AONB.large.scale.wind.or.solar.farms.are.unlikely.to.be.appropriate.' It is noted that the scheme is over 4.5km from the Cotswold National Landscape (CNL) at its closest point, however intervisibility is likely from the CNL and as such needs to be carefully assessed to determine its impacts. Careful consideration of these matters is expected within the ES.

Section B of Policy CS.3 focuses solely on Solar Energy, and again, is supportive providing impacts can be made acceptable. The following issues however, are considered to be of particular local significance and it is expected that the Environmental Statement addresses each of these in full:

- Impact on agricultural activities and disturbances to agricultural land.
- Impact on the openness and character of the landscape and on visual amenity.
- Impact on the character of the historic landscape.
- Impacts of trees and other vegetation which may cause overshadowing, making allowance for their future growth.
- Impact on and opportunities to enhance biodiversity.
- Impact of direct and reflected lighting (including glare) on the amenity of occupied affected buildings or land on light pollution, on aviation and on biodiversity (particularly bats).

The Environmental Statement should also have regard to the Council's [Renewable Energy Landscape Sensitivity Assessment](#). Table 1 outlines the sensitivities to Solar Developments for each of the landscape areas relevant to the scheme.

Table.7. Landscape sensitivity to solar energy development

Landscape Area	Connection to scheme	Summary of sensitivity to solar energy
Arden Wooded Estatelands	Part of the proposed scheme overlaps the westerly edge of the Arden Wooded Estatelands.	The hill tops and valley slopes would be sensitive to solar energy development due to openness, visibility and skylining. The sensitivity is increased by distinctive landmarks such as woodlands and features such as Oversley Castle, as well as the heritage of the area including Ragley Hall and Park and Conservation Areas. Proximity to settlements is also an issue. The area is overlooked by higher hills to the north and from the lower land of the river valleys and the Avon Orchard Belt to the south. The least sensitive areas are where there is flat or very gently sloping plateau with screening woodland and existing non-characteristic uses such as the gliding club east of Bearley.
Avon Orchard Belt	The scheme overlaps with this landscape area west of Bidford and around Dunnington.	The area has sensitivity to solar energy development as it is predominantly open hill and valley slopes where it would be difficult to mitigate the effects of solar energy development although there are a limited number of hollows/flatter areas. The wooded hills are scenically attractive and open to view. The area is highly agriculturally productive which may be a disincentive to solar energy although the semi-formal patterns of these landscapes are more visually compatible. The field pattern is generally regular at a medium large scale which is also compatible with solar energy. The area has historic conservation features and landmarks adjacent and within it which are sensitive and is moderately tranquil although the A road corridors reduce this. The settlement pattern reduces the potential for development. Parts of the area lie within the Arden Candidate SLA.
Avon Terrace Farmlands	The scheme overlaps with this landscape area west of the A46	The area has sensitivity to solar energy development where it is open and close to valley sides allowing intervisibility. Where it broadens out and there is enclosure of hedgerows and also where there is movement and disturbance, such as around Wellesbourne there may be potential for solar energy development. However, potential locations are tempered by the presence of settlements, Conservation Areas and associated buildings and their settings and landmarks. The area is highly

		<p>agriculturally productive which may be a disincentive to solar energy although the semi-formal patterns of these landscapes are more visually compatible. The field pattern is generally regular or geometric at a medium-large scale which is also compatible with solar energy.</p>
<p>Avon Vale Farmlands</p>	<p>The scheme overlaps with this landscape area around Dorsington</p>	<p>The area has sensitivity to solar energy development where it is open and close to hillsides allowing intervisibility, especially to the south near Meon Hill. Fields of ridge and furrow are sensitive and unsuitable as are areas close to Conservation Areas and listed buildings and their settings. Where there is enclosure of hedgerows and also where there is movement and disturbance, such as around Long Marston airfield there may be potential for solar energy development. The field pattern is generally regular or geometric at a medium-large scale which is also potentially compatible with solar energy.</p>

CS.5 Landscape seeks to ensure the landscape character and quality of the District is maintained, and where possible enhanced. It is expected that the ES will consider the landscape impacts of the scheme in full to determine whether it will have a detrimental effect on features which make a significant contribution to the character, history and setting of the area, as well as the schemes visual impacts on the local landscape and townscape within its immediate and wider setting. The ES will also need to consider the schemes impact on Trees, Woodland and Hedges and not only protect the quality of ancient semi-natural woodland and aged/veteran trees, but also explore the opportunities to:

- enable the expansion of native woodlands,
- buffer, extend and connect fragmented ancient woodlands,
- develop flood risk reduction measures through the planting of woodlands, trees and undergrowth for their intrinsic value and to help climate change adaptation.

CS.6 Natural Environment looks to ensure there is a resilient ecological network throughout the district, which supports ecosystems and provides ecological security for wildlife, people, the economy and tourism. It is expected that the ES will consider the opportunities for Biodiversity net gain and ensure existing habitats are safeguarded and where possible, enhanced.

CS.7 Green Infrastructure addresses the green infrastructure network across the district, noting its importance for a low carbon economy, tourism, healthy and active communities, its role in protecting historic settings, supporting biodiversity and reducing flood risk. It is expected that the ES will address in full how the project can support and enhance the Green Infrastructure Network. The applicants should refer to the [Sub-Regional Green Infrastructure Strategy](#), and also the soon to be adopted [Local Nature Recovery Strategy](#) to inform locations for GI enhancement.

CS.8 Historic Environment seeks to protect and enhance the historic environment for its inherent value and for the enjoyment of present and future residents and visitors. For any proposals that will affect a heritage asset the applicant will be required to provide an assessment of the significance of the asset and the likely impact the proposal will have on the assets historic interest. It is important that the ES conducts proportionate assessments of the assets to determine level of impact. Depending on the level of impact determined by the assessments the following sections of CS.8 become relevant:

›Proposals.which.would.lead.to.substantial.harm.to?or.total.loss.of.significance.of? designated.heritage.assets.will.only.be.permitted.where.substantial.public.benefits.outweigh.that.harm.or.loss.and.it.is.demonstrated.that.all.reasonable.efforts.have.been.made.to.sustain.the.existing.use.or.find.reasonable.alternative.uses;

Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset? this harm must be justified and weighed against the public benefits of the proposal? including securing its optimum viable use?"

Should harm to heritage assets be identified, the applicant will need to justify within the ES the level of public benefits perceived to be resultant from the scheme.

CS.11 Cotswold Area of Outstanding Natural Beauty considers the impact of development proposals on the Cotswold National Landscape (CNL) and outlines that proposals should seek to conserve and enhance the special landscape qualities and scenic beauty of the designation, whilst being consistent with the objectives of the Cotswold AONB Management Plan. Particularly pertinent to the Arrow Valley proposal is the following:

Large scale development will not be allowed unless exceptional circumstances and public interest are demonstrated in accordance with all the criteria set out in the National Planning Policy Framework;

Whilst outside of the CNL the scheme is likely to be visible from points within the CNL and as such due consideration needs to be given to the impacts on this designation. Should impacts be identified through consultation with the CNL Board the ES will need to demonstrate how exceptional circumstances and public interest have been met, particularly now that National Policy has changed stating that there is now a duty, to seek to further the purposes of the National Landscape.

CS.12 Special Landscape Areas addresses the high landscape quality of certain areas across the District and seeks to protect these qualities from development which would have a harmful effect on their distinctive character. Part of the scheme falls within the Arden SLA which has been designated for its scenic quality in terms of the juxtaposition of well wooded rounded hilltops and slopes enclosing valleys, fine oak dominated hedgerows, intimate pastoral scenes, cultural heritage features and sense of tranquillity. The ES will need to address the impact on this SLA and how any impacts will be mitigated.

Neighbourhood Development Plans

It is noted that the scheme falls within the Neighbourhood Areas of two areas that have adopted Neighbourhood Plans, these being the [Bidford-on-Avon NDP](#) and the [Salford Priors NDP](#).

It is considered that the ES should refer to the policies contained within these development plan documents and demonstrate how relevant policies have been considered.

South Warwickshire Local Plan

Stratford-on-Avon and Warwick District Councils are currently working jointly to prepare a new Local Plan for the two District Areas. This plan, once adopted will supersede the existing Core Strategy. The SWLP will shortly be undertaking its Regulation 19 consultation which will present the proposed growth strategy and accompanying policies. The Regulation 19 Consultation is scheduled to take place in June, and as such the document and proposals contained within will be publicly available around this time. It is considered that the ES should refer to the policies contained within this publication document and address accordingly.

Two aspects of the Regulation 19 consultation it considered pertinent to the Arrow Valley Proposals will be the proposed growth strategy, and updated evidence base for Special Landscape Areas.

As outlined within the Regulation 18 Consultation, Bidford-on-Avon falls within an identified Priority Area for growth, as such development is being considered within this area. The applicant may wish to refer to the published growth strategy during the consultation to identify if there are overlaps with the Underground Cable Route Corridor Area of Search and proposed allocations.

It is also noted that work is currently underway to review the Special Landscape Areas within the District. As discussed above, the proposals fall in part within the Arden Special Landscape Areas. The applicant may wish to refer to the evidence when published to determine whether there have been any amendments to the boundary of the existing SLA.

Conclusion

The Arrow Valley Solar Nationally Significant Infrastructure Project is a Renewable Energy scheme that would fall in part within Stratford-on-Avon District Council's boundary. Existing Policy identifies support for renewable energy schemes on the basis that any impacts can be mitigated or otherwise justified. The next stage of this project is for the Planning Inspectorate to issue a Scoping Report which outlines the scope and level of detail that an Environmental Statement must include. As relevant stakeholders Stratford-on-Avon District Council has been asked to identify what it considers should be provided within the ES. Stratford-on-Avon District Council has, in this response, identified relevant information it wishes to see addressed within the ES, and looks forward to reading the finalised statement, once prepared.


Planning Policy Officer

Local Plans Team

22/04/2026



To: Stratford-on-Avon District Council
From: Iceni Projects
Date: 20/04/2026
Title: Arrow Valley NSIP Landscape and Visual Scoping Review

Introduction

1. This document has been prepared by Iceni Projects on behalf of Stratford-on-Avon District Council (SoADC) in its capacity as a statutory consultee to the Planning Inspectorate (PINS) in respect of the Environmental Impact Assessment (EIA) Scoping Report submitted by Arrow Valley Solar Limited (the 'Applicant') for a proposed solar photovoltaic (PV) electricity generating station, and associated development including Battery Energy Storage System (BESS), Ancillary Infrastructure, a Customer Substation and Grid Connection Infrastructure (the 'Proposed Development') hereafter referred to as the 'Scheme'.
2. The Scheme is proposed to be distributed across four principal solar array sites, connected by seven Cable Route Corridors (CRCs). The Scheme will feature tracking solar arrays up to 4.5m above ground level (and 3.5m for fixed panels), BESS enclosures and various conversion units, switch rooms and switchgear up to 4.5m in height, a 400kV substation up to 15m in height and additional 132kV substation up to 9.5m in height, and security fencing and pole-mounted CCTV up to 3m tall.
3. The Scheme spans the administrative areas of SoADC, Wychavon District Council, Worcestershire County Council, Warwickshire County Council and the Borough of Redditch. SoADC is the principal host authority for Sites 1, 2, 3 and 4 and the majority of the CRCs. The immediate landscape context to the Scheme includes the Cotswolds National Landscape and the Arden Special Landscape Area.
4. Iceni has reviewed the EIA Scoping Report (dated March 2026) with particular regard to the Landscape and Visual topic, as set out in Chapter 12, setting out a series of observations and recommendations in relation to the scope and methodology proposed by the Applicant for this element of the Environmental Statement (ES) with reference to the Landscape Institute Technical Guidance Note 1/20: Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs) (published 10 January 2020).
5. It is recognised that a Scoping Report is by definition a proportionate document and not all matters of detail need to be resolved at this stage. This review has therefore distinguished between points that are critical to the adequacy of scoping (issues that, if not addressed, would prejudice the ability of the ES to demonstrate compliance with the EIA Regulations 2017 and GLVIA3) and matters of refinement that the Applicant should reasonably be expected to address through the iterative LVIA process.

Review of Applicant's Assessment Methodology

Overall Approach

6. The Applicant establishes that the assessment of landscape and visual effects will be undertaken in accordance with the Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3) (2013), correctly making a distinction between landscape effects and visual effects.

Study Area

7. A preliminary study area of 3km is proposed, justified by reference to the GLVIA3 principle of proportionality. For comparable consented and proposed solar NSIPs, study areas of 5km are more typical. Given the undulating nature of the context and the proximity of both the Cotswolds National Landscape and the Arden Special Landscape Area to the Scheme and the clear relationship between parts of the Site and these designated landscapes, it is considered that the study area for the assessment of landscape and visual effects should be enlarged to 5km from the outer limits of the Scheme to accurately and robustly assess the potential for likely significant effects to arise.
8. A 500m study area for the CRCs is proposed on the basis that effects are likely to be limited to the construction period, the principle of which is accepted and is considered broadly appropriate for the type and scale of development proposed. It is considered that 500m act as the provisional study area, retaining flexibility to the limits of this study area as the Scheme evolves through the iterative process to reflect impacts on or proximity to, or indeed absence of, potentially sensitive receptors.

Legislation, Policy and Guidance

9. Given the proximity of the Site to the Cotswolds National Landscape, the Levelling-up and Regeneration Act 2023 (LURA) is a notable omission, specifically the requirement under Section 245 regarding the active duty to further the statutory purposes of designated landscapes.
10. The Environment Act 2021 (Biodiversity Net Gain) is a further omission and is clearly of relevance related to the provision of landscaping measures incorporated within the design of the Scheme and their long-term management and potential implications on the character of the landscape. The commitment to deliver an Outline Landscape and Ecological Management Plan (oLEMP) as part of the DCO is acknowledged.
11. The list of relevant policy and guidance appears proportionate and appropriate.

Methodology Steps and Criteria

12. It is noted that the term "impact" is defined as the "action being taken". However, GLVIA3 also highlights that there is a clear distinction between impacts and effect, with the latter the result of that action, and that the terms are used consistently in this manner. There is therefore a degree of concern that the methodology refers to the "magnitude of impact", as opposed to the "magnitude of effect" or "nature of effect".
13. The Scoping Report in Paragraph 12.4.6 sets out that the method for determining sensitivity and [impact] magnitude set out in Table 2-1 and Table 2-3 will be modified to align with GLVIA3. This approach is not supported.
14. GLVIA3 Paragraph 3.32 expressly cautions against the use of generic matrices to derive the significance of landscape and visual effects. The matrix approach is criticised in GLVIA3 because the determination of significance 'cannot be a formulaic activity' and 'judgement must always be exercised'.

15. Furthermore, sensitivity must be derived from a combination of value and susceptibility, whereas Table 2-1 does not capture susceptibility considerations at all. Similarly, [impact] magnitude in Table 2-2 is overly generic and fails to reflect size/scale, geographical extent, duration and reversibility considerations.
16. A commitment to modifying the tables to align with GLVIA is not considered to be sufficient, particularly in the absence of how this would be achieved and the inherent inconsistencies (e.g. absence of susceptibility, use of impact instead of effect) that are present. The criteria, thresholds and worked definitions for value, susceptibility, sensitivity, magnitude (and therein size/scale, extent, duration, reversibility) and the basis on which significance will be reached should all be provided to SoADC as part of a methodology statement for agreement.
17. At present the assessment methodology of landscape and visual effects is unsupported.

Review of Applicant's Scope of Assessment

Identification of Receptors

18. The Scoping Report highlights that early opinion was sought regarding a preliminary list of potential viewpoints locations, with responses received from all with the exception of SoADC. Early and continued engagement with the relevant authorities is welcomed and to inform the scope of visual assessment and outlining potential visualisation requirements. It is welcomed that both summer and winter photomontages will be provided (the number and locations of which subject to agreement), and recommend that further summer photomontages are provided for later assessment years where relevant to depict the effects of the implementation and ongoing management of embedded landscape proposals.
19. Note that there is a suggestion that 3 to 6 photomontages will be produced for each of Sites 1 – 4, while no photomontages will be produced for the CRCs. Recommend that the position on whether this is suitable is reserved regarding photomontage production for the CRCs following a more firm position on the likely route(s) and potential for vegetation removal or additions that may result in significant landscape or visual effects.
20. The Scoping Report is not complemented by a Zone of Theoretical Visibility (ZTV), which is a notable omission. This should be provided to SoADC, in conjunction with a transparent ZTV production methodology statement, in order to advise on the appropriate distribution of assessment viewpoints, while reflecting a broader study area of 5km. Where practicable, ZTV projections should illustrate both 'bare-earth' and 'with barriers' viewshed scenarios, differentiating between solar photovoltaic arrays, Battery Energy Storage System (BESS), substation and grid connection infrastructure.
21. The identification of landscape receptors is considered to be robust and comprehensive and there is agreement with those landscape receptors identified for inclusion within Table 12-2. The suitability of the representative viewpoints as set out in Table 12-1 (and therefore visual receptors) to be assessed should be subject to agreement following receipt of ZTV projections as set out above.

Summary of Recommendations

22. Based on the review of the EIA Scoping Report and supporting documentation, the following recommendations are made to ensure the subsequent Environmental Statement (ES) is robust and compliant:
 - Expansion of Study Area: The study area for the assessment of landscape and visual effects should be increased from 3km to 5km from the outer limits of the Scheme. This is essential to account for the undulating topography and the potential for significant effects on highly

sensitive receptors within the Cotswolds National Landscape and the Arden Special Landscape Area.

- Provision of ZTV Mapping: The Applicant must provide Zone of Theoretical Visibility (ZTV) mapping to SoADC to justify the selection of viewpoints and related visual receptor groups. This should include both 'bare-earth' and 'with barriers' scenarios, with distinct projections for the varying heights of the solar arrays, BESS, and the substation.
- Methodological Realignment with GLVIA3: The Applicant should submit a detailed Methodology Statement for agreement. This must move away from generic matrices and explicitly demonstrate how susceptibility and value are combined to determine sensitivity, and how size/scale, duration, and reversibility inform the magnitude of effect.
- Terminology Correction: The methodology must be updated to distinguish between "impact" (the action) and "effect" (the result), ensuring the assessment focuses on the magnitude of effect in accordance with standard GLVIA3 practice.
- Provision of Visualisations: The number and location of photomontages must be agreed upon with SoADC following the review of the 5km ZTV.
- Year 15 (Summer) photomontages should be provided to demonstrate the effectiveness of proposed mitigation planting at maturity, the locations of which to be agreed at a later date, while the requirement for photomontages regarding the Cable Route Corridors (CRCs) should remain reserved until the final routes and the extent of required vegetation clearance is confirmed.



To: Stratford-on-Avon District Council
From: Icen Projects, Built Heritage
Date: 15/04/2026
Title: Arrow Valley Solar Farm - Heritage Scoping Review

Introduction

1. This Heritage Scoping Review is provided on behalf of Stratford-on-Avon District Council (Stratford DC) in relation to the Arrow Valley Solar Farm [EN0110033]. The advice and observations made below are made in relation to the built heritage elements of the Historic Environment Chapter (13) of the Scoping Report, submitted to PINS on the 30th March 2026.
2. Overall, the proposed approach to scoping the topic of built heritage is broadly acceptable, however further work is recommended to refine the methodology and provide further justification for the Study Area. As noted at paragraph 13.4.12, it is considered positive that the Applicant will be seeking discussion with the local authorities and Historic England on heritage matters and Stratford DC would welcome further consultation to finalise and agree the scope of assessment.

Review of Scope of Assessment

3. The Applicant's approach to significance and setting broadly accords with the NPPF and NPS policy.¹ The scoping shows an awareness of proportionality and selective approach to grouping certain assets and assessing more sensitive assets individually is welcomed on the basis that sufficient information is provided to understand significance, contribution of setting and whether impacts would be significant. Although an ES should be "proportionate and focused, with just the sufficient detail required to clearly identify the likely significant effects"², it is felt that further discussion and analysis is required to demonstrate that the Applicant's proposed 1km Study Area is sufficient to capture all potential significant effects on above ground heritage assets. This is particularly relevant for highly graded designated heritage assets which fall beyond 1km as there is currently very limited justification as to why heritage assets beyond 1km would not be affected and have been excluded.
4. Due to the Site being located in the Avon and Arrow Terrace, and the Avon Vale landscape character areas, the topography varies between low ridges and terraces which stand above the valley floor. This landscape variance results in the potential for the Site to contribute to the wider setting of assets which stand beyond 1km due to visibility from the surrounding area. As such, it will be important that highly designated heritage assets, in particular, are reviewed beyond 1km to understand whether potential significant effects may arise, or to justify their scoping out. While the Applicant asserts that "assets beyond 1 km are unlikely to have significant views of the Scheme", and this may be correct, further evidence is required to determine if the 1 km radius is proportionate or whether expanding the Study Area would be warranted. This is recommendation is made with particular reference to the highly sensitive heritage assets of x2 Scheduled Monuments, x1 Grade I, x5 Grade II*, and x1 Registered Park and Garden which are located

¹ NPPF (2024), paragraphs 207 and 208. EN-1 (2025), paragraphs 4.2.13, 4.3.10, 5.9.12.

² EN-1. Paragraph 4.2.13

between 1-2km radius and within Stratford-on-Avon's administrative boundaries of the Order Limits.³

5. Whilst the Applicant has acknowledged that the scope of assessment may change, particularly in tandem with landscape and visual assessment work, it will be important to understand this next stage of analysis before the scope of heritage assets can be fully agreed. It is recommended that the Applicant takes an asset-based approach to scoping where the scope of assessment is not so strictly defined by a Study Area but considers the possibility of assets being affected from a wider radius and narrowing down from there where it can be demonstrated that they are unlikely to be affected. Although several factors may limit intervisibility with the Order Limits (intervening built form, mature woodland and topography), it is recommended that the Applicant cross-references the scope against a Zone of Theoretical Visibility (ZTV) which is prepared to at least 2km radius and ideally further afield for highly designated heritage assets. Should tracking panels be proposed, the ZTV should be based on the maximum height of the panels at full tilt and not the fixed level nighttime positioning. This would ensure that the proposed study area is proportionate and sufficient information is provided in order to understand the potential effects of the Scheme on built heritage assets, in line with National Policy Statement EN-1 para. 5.9.12.
6. Consideration should also be given to cross-referencing proposed views identified by LVIA to ensure the impact on setting and significance can be sufficiently understood and proportionally assessed, including whether photomontages may be useful to support the heritage assessment. For example, it is noted that the LVIA scoping current only proposes a baseline image from Wood Bevington Manor (VP1M) and photomontages would allow for greater assessment of the change that the Development poses to the Grade II* asset's wider setting. It is recommended that the assessment of co-visibility is focused on highly graded assets where the wider baseline landscape character makes a strong contribution to the informative setting. For example, it would be good to understand why the Applicant has not identified views from within Ragley Hall Registered Park and Garden (Grade II*) which contains a number of highly designated assets, and whether views should be included to support future assessments.
7. In addition to visual change, it is noted that, as set out within the Planning Practice Guidance paragraph 13⁴ and in Historic England's The Setting of Heritage Assets (GPA 3), the experience of an asset's setting is influenced by other environmental factors beyond views. Therefore, the scoping methodology should determine how it has made consideration to the multiple environmental factors and not just potential effect from changes to the baseline visibility of setting. The scope of assessment should also illustrate how awareness has been given to the range of potential effects, including potential effects from noise, vibration, increase in traffic movement and potential glint and glare, and the understanding that the stages of construction, operation, and decommissioning might necessitate inclusion of assets.
8. Finally, the Applicant's approach to the scoping of NDHA should look to differentiate between assets of archaeological value (below ground) and built cultural heritage assets (above ground). These asset types are currently combined within Table 13-2 and the associated Figures which confuses the scope of each discipline. The current scope of NDHAs also appears to reference statutory listed buildings (e.g. the Church of St Milburga) and results in duplication of assessment. It is recommended that the HER data is reviewed and the scope of built NDHAs is clarified in consultation with the local authority.

Review of Assessment Methodology

Definitions of Value

9. The Applicant's Assessment Criterion Table (Table A13-1) differentiates the value of Conservation Areas from high – medium depending on whether they contain "very important buildings" or "buildings which contribute significantly to their historic character". Likewise, NDHAs can range from high ("national interest"), medium ("exceptional quality") and low ("moderate quality"). The

³ There are no additional Conservation Areas between 1-2km of the Order Limits and 29 Grade II assets.

⁴ Planning Practice Guidance (2019). Paragraph 013 Reference ID: 18a-013-20190723

definition is considered unclear as it does not identify what factors contribute to each threshold of value. As such, the local authority would appreciate further clarification, either within the methodology itself or as part of future assessments of significance to explain how and why assets have been categorised as 'high', 'medium', 'low', etc.

Magnitude of Impact

10. The applicant's terminology on high magnitude of impact at Table A13-2 ("change such that the heritage significance of the asset is totally altered or destroyed through physical impact") appears to use the wording of *Bedford BC v SCLG38* and, at 13.4.19, the Applicant alludes to adverse effects broadly aligning with substantial harm at moderate adverse (subject to professional judgement) and above. In the Bedford case, the High Court determined that substantial harm to designated assets "was required to be serious such that very much, if not all, of the significance was drained away... One was looking for impact which would have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced...". However, it was held in the Holocaust Memorial case (*London Historic Parks And Gardens Trust v Minister of State for Housing & Anor [2022] EWHC 829 (Admin)*) that that the Bedford judgment did not import a test of "draining away" to the test of substantial harm and that it is not appropriate to treat this as creating a gloss or additional meaning to the test. In determining substantial harm, as set out in PPG para.18, it is important to consider "whether the adverse impact seriously affects a key element of its special architectural or historic interest". As such, whilst the applicant has shown an awareness of the more recent judgement and PPG within the context of assessing setting, it is considered that the criteria for high magnitude of change should be reviewed holistically taking this judgement into account.

Summary of Recommendations

11. Overall, the following recommendations can be summarised as:

- It is recommended that the scope of assessment is reviewed beyond the 1km Study Area to confirm whether all likely significant effects have been captured, particularly in relation to highly designated heritage assets located between 1–2km of the Order Limits, or to provide further justification for their exclusion.
- The scope of assessment should be refined through cross-referencing with a Zone of Theoretical Visibility to help confirm the proportionality of the Study Area and identify assets where intervisibility with the Scheme may warrant further assessment.
- The scope of Non-Designated Heritage Assets should be refined to clearly differentiate between archaeological assets and built heritage assets, avoiding duplication in the HER data and ensuring a clear and proportionate scope of assessment.
- The assessment methodology should make some minor refinements to provide greater clarity on definitions of value and magnitude of change.
- It is recommended that the scope of the heritage assessment is reviewed and agreed with Stratford-on-Avon District Council and Historic England during consultation and in advance of submission.



To: Stratford-on-Avon District Council
From: Icen Projects
Date: 24th of April 2026
Title: Arrow Valley NSIP Archaeology Scoping Review

Introduction

1. This section of the Scoping Opinion relates to Archaeology. Built heritage matters are addressed separately.
2. The Applicant's submitted Scoping Report has been reviewed. The following sets out the expected scope of archaeological assessment within the Environmental Statement (ES).
3. The assessment should be prepared having regard to relevant legislation, national policy, and guidance, including the Planning Act 2008, the National Planning Policy Framework, relevant Planning Inspectorate Advice Notes, applicable professional standards (including Chartered Institute for Archaeologists standards and Historic England guidance), and relevant development plan policies where these provide locally specific context for the historic environment.
4. The ES should reflect current sector-specific good practice, including recent guidance on Archaeology and Solar Development (2026), which promotes a design-led and proportionate approach, including early non-intrusive survey to inform masterplanning and reduce reliance on extensive intrusive investigation. The ES should confirm whether relevant National Policy Statements for energy NSIPs (including EN-3) have been taken into account.
5. The Scoping Report identifies a large and varied historic environment resource within the Site and Study Area, including designated assets, a high number of non-designated assets, and areas of archaeological and geoarchaeological potential. The ES should therefore ensure that the scope and methodology are appropriate to this level of complexity and potential.
6. The comments below reflect the position at the scoping stage. The assessment should be capable of refinement as further information becomes available.

Overall Approach to Archaeology

7. The proposed approach provides an appropriate high-level framework for the assessment of archaeological effects. However, key components of the baseline, including the Desk-Based Assessment (DBA), geophysical survey report, and the geoarchaeological deposit model, are not yet complete.
8. The baseline information identifies a substantial archaeological resource within the Site and Study Area. This includes the Scheduled Monument 'Enclosures ¾ mile (1200 m) north of Salford Priors' (NHLE 1005721) within Site 2(d), comprising a series of archaeological enclosures of likely later prehistoric or Romano-British origin, forming part of a wider archaeological landscape. The

Scoping Report notes the potential for associated archaeological remains beyond the designated boundary.

9. A high number of non-designated assets are also recorded (over 800 within the Study Area), including a notable concentration within the Site itself, alongside evidence of prehistoric settlement activity, medieval ridge and furrow, and later agricultural and settlement features.
10. The Scoping Report also identifies potential for geoarchaeological and palaeoenvironmental remains, including deposits associated with gravel members, head deposits and possible palaeochannels, particularly within parts of the Site and the Cable Route Corridors (CRCs). These deposits may preserve waterlogged and organic-rich sediments of high evidential value and may contribute to local and regional research objectives. Such deposits may not be detectable through geophysical survey and should be addressed through the baseline and evaluation strategy.
11. Taken together, this evidence indicates that the Site is of high archaeological potential, with the likelihood of both known and currently unidentified remains.
12. The ES should ensure that:
 - the assessment is informed by a comprehensive and up-to-date evidence base at the point of submission;
 - a proportionate and robust programme of pre-application evaluation is undertaken to support assessment of likely significant effects;
 - the scope of assessment remains responsive to new information;
 - reliance on post-consent mitigation alone is avoided; and
 - consultation with relevant archaeological advisors and Historic Environment Record (HER) data is clearly evidenced.

Archaeological Baseline

13. Where appropriate, the baseline should consider geoarchaeological potential, including the presence, depth, and preservation of buried deposits.
14. The ES should be supported by a robust and comprehensive archaeological baseline, including:
 - a completed Desk-Based Assessment (DBA) drawing on up-to-date HER data;
 - review and synthesis of relevant archaeological investigations within and around the Site;
 - geophysical survey results where appropriate;
 - aerial photography and LiDAR analysis;
 - consideration of Historic Landscape Characterisation (HLC), where relevant; and
 - a combination of intrusive (e.g. test trenches and boreholes) and non-intrusive (e.g. geophysical survey, fieldwalking) evaluation.

15. The baseline identifies a substantial and varied archaeological resource, including a Scheduled Monument, a high density of non-designated assets, and evidence ranging from prehistoric to post-medieval activity.
16. Evidence includes cropmarks, ridge and furrow, and previous investigations, indicating a complex and spatially extensive archaeological landscape.
17. The assessment should not rely solely on recorded assets and must address the potential for currently unidentified archaeological remains.
18. The absence of recorded remains should not be taken to indicate an absence of archaeological potential.
19. At present, the baseline is incomplete. A full Desk-Based Assessment and geophysical survey results are not yet available, and the current evidence base is insufficient to fully characterise the archaeological resource or support a robust assessment of effects.
20. Geoarchaeological potential should be addressed through deposit modelling and, where necessary, supported by monitoring of ground investigation works and targeted intrusive investigation (e.g. boreholes or test pits), with appropriate palaeoenvironmental assessment.

Study Area and Scope of Assessment

21. The proposed study areas are noted. However, study areas should be clearly justified with reference to baseline evidence, rather than relying solely on fixed distance thresholds.
22. In this context, the baseline indicates a complex archaeological landscape, including a Scheduled Monument, a high density of non-designated assets, and the potential for associated remains extending beyond the Site boundary. This suggests that proportionate refinement of study areas may be required as the evidence base develops.
23. For designated assets, including the Scheduled Monument, a study area of up to 2km should be adopted as a starting point.
24. For non-designated assets, a study area of up to 1km is appropriate. Smaller study areas should be clearly justified.
25. Particular consideration should be given to the Cable Route Corridors (CRCs), where alignment and impacts remain uncertain.
26. Study areas should be refined as the baseline develops.
27. Study areas should be refined as the baseline develops.

Assessment Methodology and Significance Criteria

28. The proposed methodology is broadly appropriate but requires further clarification.
29. The ES should clearly define terminology, magnitude of impact, and significance of effect, demonstrate consistent application, and ensure alignment with recognised professional guidance.
30. The methodology should explicitly address uncertainty and precautionary assumptions.

31. Geoarchaeological potential should be incorporated into the methodology through iterative deposit modelling, to be refined as the baseline develops and throughout subsequent project stages.
32. Limitations of geophysical survey should be addressed through complementary approaches.
33. The ES should demonstrate how evolving baseline data informs the assessment.
34. Group value and spatial relationships should be taken into account.

Archaeological Evaluation Strategy

35. The staged approach to archaeological investigation is supported in principle. Early non-intrusive surveys, including geophysical survey, should be undertaken at an early stage to inform masterplanning and the evolution of the Scheme design.
36. This design-led approach should demonstrate how impacts are avoided or reduced through layout and infrastructure design.
37. However, geophysical survey alone is unlikely to be sufficient, particularly in areas of complex geology or geoarchaeological potential.
38. Intrusive investigation should, where proportionate, inform the ES at application stage and should not be deferred solely to post-consent mitigation.
39. 'Archaeological investigation' should be clearly defined, including both intrusive and non-intrusive methods.
40. A proportionate and robust programme of targeted pre-application evaluation should therefore be undertaken, focused on areas of likely higher impact, including proposed infrastructure, access routes and areas of ground disturbance, and informed by the results of early-stage geophysical survey.
41. This should include targeted trial trenching focused on infrastructure and areas of impact, and geoarchaeological investigation where appropriate.
42. This approach should demonstrate a design-led and proportionate balance between front-loaded evaluation and targeted intrusive investigation, avoiding unnecessary or extensive trenching where impacts can be effectively avoided through design.

Potential Effects and Scoping

43. Given the current baseline is incomplete, it is not appropriate at this stage to conclude that impacts are limited or can be fully mitigated.
44. The ES should assess direct impacts, uncertainty associated with CRCs, impacts on non-designated assets, and indirect impacts on designated assets.
45. Indirect effects do not appear to have been considered in detail within the Scoping Report and should be fully assessed.

Mitigation and Embedded Design Measures

46. The use of embedded mitigation through design is supported.

47. The Scoping Report (Paragraph 4.3.6) refers to 'no-dig' solutions. This is supported in principle but must be demonstrated to be effective.
48. The ES should demonstrate how design evolution has avoided impacts and clearly distinguish between embedded mitigation and additional mitigation.
49. Reliance on 'no-dig' solutions or outline mitigation should not substitute for a robust assessment at ES stage.

Decommissioning Effects

50. The proposed scoping out of decommissioning effects requires clear justification.
51. Potential impacts arising from removal of infrastructure should be considered.
52. Any scoping out should be supported by clear evidence.

Conclusions and Recommendations

53. The proposed scope provides an appropriate basis for assessment in principle. However, further clarification is required to ensure that the ES is supported by a proportionate and robust evidence base.
54. In particular, the ES should ensure that:
 - the assessment is informed by a robust and complete archaeological baseline;
 - a proportionate and targeted programme of pre-application evaluation supports assessment of likely significant effects;
 - uncertainty is clearly identified and addressed;
 - likely significant effects are not scoped out prematurely; and
 - mitigation is supported by clear evidence and not relied upon in place of assessment.



UK Health
Security
Agency

Environmental Hazards and Emergencies Department
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Your Ref: EN0110033
Our Ref: 94789

Mr Joseph Jones
Environmental Advisor
Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough
Berkshire SL1 4PN

27 April 2026

Dear Mr Jones

**Nationally Significant Infrastructure Project
Arrow Valley Solar, EN0110033
Scoping Consultation Stage**

Thank you for including the UK Health Security Agency (UKHSA) in the scoping consultation phase of the above application. ***Please note that we request views from the Office for Health Improvement and Disparities (OHID) and the response provided below is sent on behalf of both UKHSA and OHID.*** The response is impartial and independent.

The health of an individual or a population is the result of a complex interaction of a wide range of different determinants of health, from an individual's genetic make-up to lifestyles and behaviours, and the communities, local economy, built and natural environments to global ecosystem trends. All developments will have some effect on the determinants of health, which in turn will influence the health and wellbeing of the general population, vulnerable groups and individual people. Although assessing impacts on health beyond direct effects from for example emissions to air or road traffic incidents is complex, there is a need to ensure a proportionate assessment focused on an application's significant effects.

Having considered the submitted scoping report we make the following comments and recommendations:

Environmental Public Health

We recognise the promoters' proposal to include a health section. We believe the summation of relevant issues into a specific section of the report provides a focus which ensures that public health is given adequate consideration. The section should summarise key information, risk assessments, proposed mitigation measures, conclusions and residual impacts relating to human health. Compliance with the requirements of National Policy Statements and relevant guidance and standards should also be highlighted.

In terms of the level of detail to be included in an ES, we recognise that the differing nature of projects is such that their impacts will vary. UKHSA and OHID's predecessor organisation Public Health England produced an advice document *Advice on the content of Environmental Statements accompanying an application under the NSIP Regime*¹, setting out aspects to be addressed within the Environmental Statement¹. This advice document and its recommendations are still valid and should be considered when preparing an ES. Please note that where impacts relating to health and/or further assessments are scoped out, promoters should fully explain and justify this within the submitted documentation.

Whilst we recognise that at this time, locations are not fixed, we would consider the distance from the BESS to sensitive receptors to be considered within the BSMP in the event of fire.

Our position is that pollutants associated with road traffic or combustion, particularly particulate matter and oxides of nitrogen are non-threshold; i.e, an exposed population is likely to be subject to potential harm at any level and that reducing public exposure to non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards will have potential public health benefits. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure) and maximise co-benefits (such as physical exercise). We encourage their consideration during development design, environmental and health impact assessment, and development consent.

Recommendation

We would expect consideration of the BESS location and its distance from receptors, in relation to public health risks in the event of a fire, in line with national fire guidance².

Recommendation

It is noted that a technical impact assessment for Electromagnetic Fields will be carried out and included as an appendix in the ES. This should clarify that the proposed development

1

<https://khub.net/documents/135939561/390856715/Advice+on+the+content+of+environmental+statements+accompanying+an+application+under+the+Nationally+Significant+Infrastructure+Planning+Regime.pdf/a86b5521-46cc-98e4-4cad-f81a6c58f2e2?t=1615998516658>

² [Grid scale energy storage system planning - Guidance for fire and rescue services - NFCC](#)

does not impact any receptors from potential sources of EMF; or ensures that an adequate assessment of the possible impacts is undertaken and included in the ES.

Please ensure the following DECC Codes of Practice are addressed in the assessment:

<https://assets.publishing.service.gov.uk/media/5a796799ed915d07d35b5397/1256-code-practice-emf-public-exp-guidelines.pdf>

<https://assets.publishing.service.gov.uk/media/5a7971e640f0b642860d8273/1255-code-practice-optimum-phasing-power-lines.pdf>

For cables over 132 kV and where evidence for compliance with ICNIRP exposure guidelines is needed, the above codes of practice state that a calculation or measurement of the maximum fields directly above the cable is to be provided.

Yours sincerely

On behalf of UK Health Security Agency

Please mark any correspondence for the attention of National Infrastructure Planning Administration.

Arrow Valley Solar EIA Scoping Report – Comments from Warwickshire County Council

Warwickshire County Council has reviewed the Arrow Valley Solar EIA Scoping Report and provides the following comments as a statutory consultee. The County Council broadly agrees with the issues to be scoped into the Environmental Statement.

The comments below provide technical input on the topics included in the Scoping Report, including areas where additional detail is required and where issues can be addressed through documents supporting the DCO application.

1 Waste and Materials

Warwickshire County Council agrees that waste and materials can be scoped out of the EIA. Solar farms are accepted to not sterilise mineral reserves, and effects on minerals and waste are not expected to be significant.

2 Water Environment

The Scoping Report provides some details on flood risk and drainage for the proposed development site, recognising that the red line boundary contains 6 Main Rivers and 106 ordinary watercourses. It is understood that due to the vast size of the development, the development does not solely sit within Warwickshire, meaning both Warwickshire County Council and Worcestershire County Council will be the over-arching LLFA of their respective parcels of development. Matters relating to surface water drainage and flooding have been scoped out of the report.

Areas of the site will be located within Flood Zones 2 and 3, largely correlating with the Main Rivers identified. The risk of flooding from rivers and seas and surface water also varies across parcels of the development, however a brief overview of this has been tabulated with *Table A 5-12 Detailed Flood Risk Baseline*. Historic flood events have also been recorded within this table.

A detailed Drainage Strategy and Flood Risk Assessment for the development proposals will be required under the NPPF and submitted under the DCO application. These should include details of how flood risk from all sources affects the proposed development and how surface water will be managed appropriately on site without increasing flood risk on site or on third party land. This includes consideration of the nearby watercourses and those situated within the site boundary.

The report does highlight that “with mitigation measures, operational impacts on fluvial and surface water flood risk are expected to be minimal and therefore flood risk aspects are scoped out”. This also applies to the likes of groundwater flooding and sewer flooding. The document also states the EA’s Flood Warning System will be adopted across the development, and initial consideration has been given to working easements near watercourses. It has also been said that key infrastructure will be located within Flood Zone 1 and initial consideration has been given to the levels of which solar panels will be installed, with a minimum clearance of 0.4 m no less than 0.6 m above the 0.1% Annual Exceedance Probability (AEP) flood level. Permeable access tracks will also be utilised.

Warwickshire County Council agrees with flood risk being scoped out of the ES given that it will be covered in an FRA and Drainage Strategy.

To be included within an FRA and drainage strategy, the LLFA would seek further information on the following points:

- Appraisal of existing site conditions (topography, hydrology, hydrogeology, land use, flow routes). Given the proposed cable route corridors, consideration should also be given to how the laying of cable may be impacted by site conditions, such as groundwater or waterbodies.
- Appraisal of suitable SuDS methods that the development will incorporate, with preference for above ground SuDS. Given the nature of the site, consideration should also be given to the planting of vegetation on site.
- Appraisal of the drainage hierarchy, infiltration test results and identification of viable outfalls.
- Site layout plans showing all surface water drainage infrastructure supported by a fully labelled network drawing showing all dimensions of all elements of the proposed drainage system.
- Calculations of existing and proposed discharge rates and volumes and proposed attenuation requirements.
- Exceedance and overland flow routing information.
- Modelling report of the whole drainage network demonstrating its performance during the critical storm in a 1 in 1 year, 1 in 30 year, and 1 in 100 year (plus allowance for climate change) return periods, including consideration of a surcharged outfall where applicable.
- Assess the likely water quality hazard arising from the development and identify appropriate mitigation.
- Where applicable, written agreement from any third-party asset or landowners required to enable the operation of the drainage infrastructure (such as evidence of an agreement with the adopting body). As Main Rivers have been identified as crossing the development site, the Environment Agency as the appropriate authority should also be consulted on the proposals.
- The LLFA also have a [Historic Flood Map](#) which may be utilised.

The above information should demonstrate that a sustainable and viable drainage strategy will be implemented, which does not create an adverse risk to flooding within the site, or elsewhere outside of the site boundary. Further details on the information required from applicants during the planning process from Warwickshire County Council as LLFA can be found within the 'Flood Risk Guidance for Development' document here: [WCCC-453486374-170](#). This document also includes a section on Solar Farm development sites, and information that should be provided to the LLFA.

3 Ecology and Biodiversity

Warwickshire County Council considers the content of the Ecology and Biodiversity chapter of the EIA Scoping Report to be comprehensive.

The County Council recommends that the consultants carrying out the breeding bird surveys contact the County Bird Recorders for both Warwickshire and Worcestershire following completion. This will ensure any notable species that are known to be present in these parts of the two counties have not been overlooked and will give some understanding of the population of such species within the context of the two counties.

4 Transport and Access

The Highway Authority has no specific comments on the EIA Scoping Report.

The following considerations will need to be taken into account should an application be made:

- Significant impacts from HGV/construction traffic will need to be considered and routing plans, CMPs etc all submitted.
- Temporary construction accesses are likely to be required at various locations and should be suitably design to the relevant standards.
- Glint and glare assessments should ensure no adverse impacts on the public highway.

5 Landscape and Visual

5.1 Study area

Warwickshire County Council agrees that the proposed scoping study area is appropriate. The proposed 3km study area from the Site boundary for solar infrastructure, extended to include an assessment of effects on parts of the Cotswolds National Landscape with clear intervisibility; and the 500m study area for the Cable Route Corridor are sufficient.

5.2 Representative viewpoints

Figure 12.4 shows the representative viewpoints to be scoped in. VP2f and VP2i are shown in two locations and should be corrected.

Warwickshire County Council would request that the following additional receptors are scoped into the LVIA:

- Avon Vale Farmlands, as defined in the Stratford-on-Avon Renewable Energy Landscape Sensitivity Study. Parcels 3e and 3f appear to fall within or on the boundary of this character type. The Stratford-on-Avon District Core Strategy requires renewable energy proposals to be determined with regard to the Council's Renewable Energy Landscape Sensitivity Assessment.
- Viewpoints located on the PRoW that crosses through Parcels 2b and 2e.
- Viewpoints located on the Heart of England Way to the north and south of Broom.
- In the vicinity of Barton and Dorsington, there are several Heart of England Forest car parks located along the rural roads, for example Dorothy's Wood Car Park. These are not shown on the OS map, but there are information boards in the car parks that show marked walking routes. Consideration should be given to the inclusion of a viewpoint to represent these locations, to ensure that visitors to the Heart of England Forest are included as visual receptors in the assessment.
- During the pre-application consultation, Warwickshire County Council requested the inclusion of a viewpoint along Welford Road where it forms part of a promoted scenic drive (South Warwickshire from Saxons to Shakespeare) and would welcome confirmation as to whether this has been explored.

5.3 Assessment methodology

Warwickshire County Council supports the general methodology set out in the Scoping Report.

However, the methodology for assessing landscape value and landscape or visual susceptibility lacks sufficient detail to clearly demonstrate how conclusions on sensitivity will be reached. Although reference is made to the Landscape Institute's Technical Guidance Note TGN 02-21: Assessing Landscape Value Outside National Designations, further clarification will be required within the LVIA chapter. This should include details of the methodology adopted to determine value, susceptibility and overall sensitivity, guided by relevant best practice and guidance documents.

The Council also notes that the approach to determining significance is described generically for the whole EIA at Section 2.3 of the Scoping Report, which uses terms such as 'Negligible', 'Minor' and 'Large' significance. The final LVIA should clearly determine whether the receptors scoped into the LVIA are judged to experience a significant effect or not.

5.4 Landscape baseline

In general, the baseline documentation referenced is appropriate to inform the baseline assessment, but a review of the contents of relevant Neighbourhood Plans should be included.

5.5 Issues of concern

It is recognised in the Landscape and Visual chapter that that the proposed development is likely to have an adverse effect on both landscape and visual receptors, some of which are likely to be significant given the quality of the existing landscape and the scale of the Scheme. Warwickshire County Council agrees with this assessment.

Based on visits to the sites and adjacent landscapes, the Council would expect that a proportion of the landscape directly impacted by the proposals would be considered 'valued landscapes' for the purposes of NPPF paragraph 187(a). Mitigation incorporated in the design should protect and enhance the landscape accordingly.

21st April 2026

ArrowValleySolar@planninginspectorate.gov.uk

Dear Sir or Madam,

Subject: Application by Arrow Valley Solar Limited for an Order granting Development Consent for the Arrow Valley Solar Project

The Police and Crime Commissioner for Warwickshire (PCC) acknowledges receipt of your letter dated 30 March 2026 regarding the scoping consultation for the above Nationally Significant Infrastructure Project (NSIP).

The PCC is responding in its capacity as a consultation body with responsibility for ensuring that the potential impacts of major development on policing services, community safety and emergency response are appropriately understood and addressed.

At this stage, the PCC does not raise any objection in principle. However, consider that the Environmental Statement (ES) should include sufficient information to enable the Secretary of State to assess the implications of the proposed development for policing resources, operational demand, safety and resilience, particularly during construction and operational phases.

Matters the OPCC considers should be addressed within the Environmental Statement

1. Construction Phase Impacts on Policing Demand

The ES should assess the potential effects of construction activity on policing services, including but not limited to:

- Workforce size, composition and accommodation arrangements during construction
- Traffic management arrangements and impacts on road safety and enforcement demand
- Potential for increased incidents of antisocial behaviour, theft, trespass, public order issues or protest activity
- Security arrangements for construction compounds, equipment and materials

- Implications for emergency access and response times during temporary road closures or diversions

This assessment should be supported by a proportionate Construction Management Plan, including liaison arrangements with local policing teams.

2. Operational Phase Community Safety and Security

The ES should consider longer-term community safety implications associated with the operational solar facility, including:

- Risk of unauthorised access, vandalism or criminal damage
- Safety and security of remote sites, substations and associated infrastructure
- Surveillance, lighting and boundary treatment proposals
- Access arrangements for emergency services
- Any implications for rural crime patterns or displacement of criminal activity

Where relevant, the ES should demonstrate how secured-by-design principles or equivalent crime prevention measures have been considered.

3. Traffic, Transport and Road Network Impacts

Whilst primarily a transport matter, the policing implications of traffic impacts should be covered, particularly:

- Increased enforcement demand as a result of abnormal loads or construction traffic
- Road safety risks requiring police attendance or intervention
- Coordination arrangements between the applicant, highway authorities and emergency services

4. Cumulative Impacts

The ES should assess cumulative impacts where the project coincides spatially or temporally with other major developments or infrastructure schemes that may collectively increase demand on:

- Local policing resources
- Emergency response capacity
- Community safety services

5. Mitigation, Engagement and Information Sharing

The ES should set out proposed mitigation measures, including:

- A clear framework for engagement with Warwickshire Police and relevant partners
- Incident escalation and communication protocols
- Proposals for funding, mitigation or management measures where additional policing demand is identified as a likely consequence of the development, where such measures meet the statutory tests

Regulation 11(3)

The OPCC notes its duty under Regulation 11(3) of the EIA Regulations and will make relevant information available to the applicant, if requested, where it is reasonable and lawful to do so.

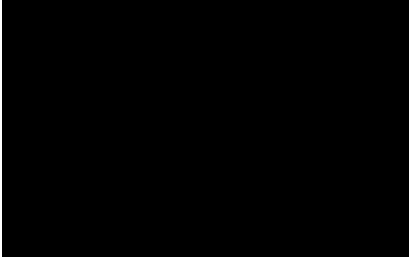
Should the Environmental Statement identify that the proposed development would give rise to additional or material impacts on policing services, whether during construction and/or operation, the OPCC considers it appropriate that suitable mitigation is explored. This may include, where necessary and justified, developer-funded mitigation secured through planning obligations or other lawful mechanisms, subject to meeting the statutory tests of necessity, direct relationship to the development, and fairness and reasonableness in scale and kind. The Environmental Statement should therefore include sufficient information to demonstrate whether any additional policing demand is likely to arise and, if so, how such impacts would be appropriately mitigated to ensure that existing policing services are not adversely affected.

Conclusion

The OPCC requests that the above matters are duly considered and reflected within the scope and content of the Environmental Statement, to ensure that the impacts of the proposed development on policing services and community safety are fully understood and appropriately mitigated.

This response relates solely to the EIA scoping consultation and does not preclude the OPCC from making further representations at later stages of the NSIP process should this be necessary.

Yours sincerely,



Head of Estates and Assets
Office of the Police and Crime Commissioner
 [@warwickshire.police.uk](mailto:warwickshire.police.uk)



worcestershire county council

To: Planning Inspectorate

Date: 26th April 2026

Your Ref: EN0110033

Our Ref: 26/0001/NSIP

RE: Application by Arrow Valley Solar Limited (the applicant) for an Order granting Development Consent for the Arrow Valley Solar (the proposed development). Scoping consultation and notification of the applicant's contact details and duty to make available information to the applicant if requested

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11

██████████
**Head of Planning
and Transport
Planning**

**Directorate of
Economy and
Infrastructure**
County Hall
Spetchley Road
Worcester
WR5 2NP



Introduction

Thank you for consulting Worcestershire County Council (WCC) on the above proposal. This response is made of behalf of WCC and comprises officer-only comments from the Planning Development Management Team, County Ecologist, County Public Rights of Way Officer, County Archaeologist, Worcestershire Regulatory Services, Local Lead Flood Risk Authority, Highway Authority and Worcestershire Wildlife Trust.

The full consultee responses are available in Appendix A 'Arrow Valley Nationally Significant Infrastructure Projects (NSIP) Scoping Request Consultee Comments' submitted alongside this response.

Background

To meet the requirements of The EIA Regulations, applicants are required to submit an Environmental Statement (ES) with an application for an order granting development consent for any NSIP likely to have a significant effect on the environment. An ES will set out the potential impacts and likely significant effects of the proposed development on the environment. Schedule 4 of The EIA Regulations sets out the general information for inclusion within an ES.

The applicant has asked the Planning Inspectorate on behalf of the Secretary of State for its written opinion (a Scoping Opinion) as to the scope, and level of detail, of the information to be provided in the ES relating to the proposed development.

Before adopting a Scoping Opinion, the Planning Inspectorate must consult the relevant 'consultation bodies' defined in The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended).

WCC has been consulted by Planning Inspectorate on the above Scoping Opinion.

Proposal

The proposal is for a solar photovoltaic (PV) electricity generating station, and associated development including Battery Energy Storage System (BESS), Ancillary Infrastructure, a Customer Substation and Grid Connection Infrastructure.

The scheme would cover approximately 1,762 hectares of land across four sites and seven Cable Route Corridors which would both connect the four sites together connect the scheme to the National Grid.

The scheme would allow for the generation and export of more than 100 megawatts (MW) Alternating Current (AC) of renewable energy, connecting into the National Electricity Transmission System. The site falls under the jurisdiction of three Local Planning Authorities: Redditch Borough Council, Stratford-on-Avon District Council and Wychavon District Council and two County Planning Authorities: Warwickshire County Council and WCC.

Comments

WCC considers that the following should be covered in the Environmental Statement: -

- Ecology and Biodiversity
- Ground Conditions and Contamination
- Soils and Agriculture
- Climate Change
- Transport and Access
- Noise and Vibration
- Landscape and Visual Impact
- Historic Environment
- Population and Human Health
- Glint and Glare
- Cumulative effects

WCC considers that the following could be scoped out of the Environmental Statement:

- Waste and Materials
- Major Accidents and Disasters
- Socio-economics
- Air Quality
- Climate vulnerability
- Electromagnetic fields (EMFs)

Additionally, whilst WCC is not against scoping out 'water environment' of the Environmental Statement in principle, the Planning Inspectorate should satisfy themselves whether this is appropriate where it relates to ecological impacts on water environment.

Ecology and Biodiversity

WCC concurs with the applicant's submitted Scoping Opinion Report that 'Ecology and Biodiversity' should be scoped into the ES.

WCC would like to make comments from the County Ecologist and Worcestershire Wildlife Trust as specified below regarding the content of this chapter.

Biodiversity Net Gain (BNG)

At present, the statutory Biodiversity Net Gain (BNG) requirement introduced through the Environment Act 2021 is not yet mandatory for NSIPs, with commencement subject to separate secondary legislation and transitional arrangements. However, Government policy and guidance make clear the expectation that NSIPs should anticipate BNG requirements and align with the principles of BNG delivery, particularly where applications are likely to be submitted following formal commencement.

In anticipation of this requirement, it is recommended that the survey strategy includes robust baseline habitat surveys, undertaken at appropriate times of year to capture seasonal variation and, where necessary, over sufficient periods. A single broad survey window (e.g. April–September, as indicated in Table 6-1) may not be appropriate for all habitat types; for example, woodland ground flora surveys in this region are typically most effective between mid-March and late April. Survey timing should therefore be tailored to habitat type to ensure BNG calculations are based on a robust and defensible evidence base.

On the assumption that the BNG requirement is activated at the point of application submission, it is expected that BNG would be delivered in accordance with the BNG hierarchy, prioritising on-site habitat retention, enhancement and creation ahead of off-site measures or statutory credits. Early integration of BNG within scheme design is therefore anticipated, with habitats designed to be ecologically coherent, deliverable, and capable of being secured through long-term management arrangements, rather than relying on late-stage compensation.

Where on-site landscaping and habitat creation align with UKHab habitat codes identified within the adopted Local Nature Recovery Strategy (LNRS) mapped measures, there is an opportunity to deliver enhanced outcomes, including uplift in strategic significance scoring within the BNG metric. Alignment of BNG delivery with LNRS priorities can therefore provide dual benefits: supporting landscape-scale nature recovery objectives while strengthening the robustness and efficiency of BNG delivery for NSIP schemes, particularly where works are associated with linear or energy-infrastructure development.

In addition to LNRS mapped measures, there is opportunity to strengthen scheme outcomes by reference to other mapped and non-mapped local priorities, including the Worcestershire Biodiversity Action Plan (BAP) and the Worcestershire Pollinator Strategy. While the installation of bee hives is noted, this is not generally aligned with pollinator recovery objectives and may risk localised competition with wild pollinators; the integration of bee banks and wild pollinator nesting features, linked to species-rich grassland and native wildflower habitats, would be more consistent with local strategy objectives. Similarly, where bird boxes are proposed, greater biodiversity benefit and strategic relevance would be achieved through consideration of a dedicated swift tower or pole-mounted barn owl boxes, particularly where these align with open farmland or infrastructure-associated habitats. Such measures would complement LNRS priorities, support priority species, and deliver targeted enhancement that is more functionally robust and locally appropriate.

Local Nature Recovery Strategy (LNRS)

The Scoping Report describes the ecological baseline primarily through reference to statutory and non-statutory site designations (Section 6.3). Further clarification is requested to confirm how the emerging LNRS has informed the identification of ecological constraints and enhancement opportunities.

It is not clear whether all Areas of Particular Importance for Biodiversity (APIB) identified through the LNRS evidence base have been systematically reviewed and treated as potential ecological constraints at scoping stage. By way of example, Local Grassland Inventory sites, which are included within the LNRS APIB layer, do not appear to be consistently reflected within the baseline or constraints mapping presented. Clarification is therefore sought on whether LNRS-defined APIB have informed the definition of the baseline, the Zone of Influence and the scoping of effects, consistent with BS 42020:2013 Clause 6.2.1(b)(5).

In addition, while the Scoping Report refers in general terms to mitigation and enhancement (Section 6.4), further clarification is requested on how LNRS Areas that Could Become of Particular Importance for Biodiversity (ACB) have informed early identification of enhancement opportunities. In particular, clarification is sought on how LNRS Potential Measure (PM) 48 – “energy infrastructure development sites” has been considered at scoping stage, including opportunities for habitat creation, restoration and strengthening of ecological networks associated with the scheme. Further information available at:

<https://storymaps.arcgis.com/collections/e40dd88149da4a0f9c98c43ffa3efafe?item=48>

Clear signposting to LNRS priorities within the ES would assist in demonstrating alignment with LNRS objectives and the mitigation hierarchy, consistent with BS 42020 Clause 5.2.

Habitat Regulations Assessment (HRA) screening and compliance

The position set out in Table 6-2, indicating that a formal HRA Screening Report will not be required, can be consistent in principle with government guidance and Planning Inspectorate advice provided that likely significant effects on European sites can be robustly excluded on the basis of objective information. Even where no likely significant effects are identified, sufficient information must still be provided to enable the competent authority to lawfully reach that conclusion. In this context, the explanatory narrative in Table 6-1, setting out why land is not considered functionally linked to a Natura 2000 site, is helpful and aligns with good practice. However, Planning Inspectorate guidance for NSIPs is clear that screening conclusions should be formally documented, typically through a No Significant Effects Report (NSER). Accordingly, while the scoping approach is directionally compliant, the conclusions currently signposted in Tables 6-1 and 6-2 should be drawn together into a clear and auditable HRA screening outcome at application stage.

Watercourses, fish and functional linkage

It is noted that impacts to watercourses and fish appear to be scoped out of the Environmental Statement. However, the River Avon and Bow Brook interact with, or are in proximity to the scheme's red line boundary and, therefore, warrant careful consideration. These watercourses should be considered not only in relation to direct and indirect impacts on aquatic and riparian biodiversity, but also in the context of potential functional linkage to the Severn Estuary Special Area of Conservation (SAC)/Ramsar site, noting previous correspondence with Natural England has identified the importance of upstream pathways.

Further clarification is therefore requested on the rationale for scoping-out these receptors, and on how hydrological connectivity and pathway effects will be addressed within the assessment framework, including in-combination considerations.

Survey Timing

The Scoping Report identifies that a range of ecology surveys will be required to inform the ES (Section 6.3, including Table 6-1), several of which are inherently season-dependent (e.g. bats, breeding and wintering birds, great crested newt, reptiles).

However, further clarification is requested to ensure consistency with BS 42020:2013 in relation to survey timing, disclosure of limitations and certainty for decision-makers. In particular:

- Section 6.3 and Table 6-1 set out proposed surveys but do not specify the optimal seasonal survey windows for key receptors, nor whether surveys can realistically be completed within those windows to inform the ES. Clarification is requested on this point, having regard to BS 42020 Clause 6.4.4 and Clause 6.2.1(b)(6).
- Section 6.7 (Assumptions and Limitations) acknowledges that surveys may be subject to constraints, but does not clearly explain the implications of seasonal constraints for data adequacy or confidence in subsequent assessment conclusions. BS 42020 expects timing and seasonal constraints to be identified as limitations, with their consequences explained (Clauses 6.7.1(a)(6) and 6.7.2).
- Section 6.5 (Assessment Methodology) does not describe how uncertainty arising from incomplete or seasonally constrained surveys would be treated within the assessment (e.g. via precautionary assumptions or sensitivity adjustments). Clarification on the proposed approach (particularly with reference to implications in the application of the Rochdale Envelope) would assist in demonstrating certainty and transparency, in line with BS 42020 Clause 6.6.1 and Clause 6.10.

Cumulative ecological effects

The Scoping Report identifies that cumulative effects will be considered within the ES (Section 6.6, with wider reference to cumulative assessment methodology in Chapter 2.4). However, further clarification is requested specifically in relation to cumulative habitat loss, fragmentation and functional connectivity across the scheme's Zone of Influence (Zol) and at the landscape scale, in order to ensure alignment with BS 42020:2013. In particular:

- Section 6.3 (Baseline Environment) describes habitats and designated sites largely at a site-by-site level across the scheme parcels and Cable Route Corridors, but does not clearly set out a landscape-scale ecological context, including the role of the site(s) within wider habitat networks or ecological corridors. Clarification is requested on how habitat connectivity and fragmentation will be considered, having regard to BS 42020 Clause 6.2.1(b)(5) (coverage of a sufficiently wide area commensurate with the requirements of the features affected).
- Table 6-1 (Preliminary Baseline and Requirements for Further Survey) focuses on receptor-specific survey needs but does not address how incremental habitat loss and severance arising from multiple Site parcels

and linear infrastructure (CRCs) will be assessed cumulatively. Further information is requested on how cumulative habitat effects will be scoped and assessed, consistent with BS 42020 Clause 6.2.1(b)(4) and (5) (ecological processes and connected systems).

- Section 6.6 (Likely Significant Effects) identifies potential effects on habitats and species, but provides limited explanation of how in-combination effects will be assessed where multiple elements of the scheme interact (e.g. multiple land parcels, substations, and cable routes), or where the scheme interacts with other reasonably foreseeable projects. BS 42020 expects cumulative and in-combination effects to be identified where relevant, even where individual effects may be limited (Clauses 6.2.1 and 8.1).
- The Scoping Report does not clearly explain how habitat function, not just habitat extent, will be considered when assessing cumulative effects (e.g. loss or weakening of stepping-stone habitats, disruption of commuting or dispersal routes). Clarification on the proposed approach would assist, in line with BS 42020 Clause 5.2 (mitigation hierarchy) and Clause 6.6.1 (certainty and clarity for decision-makers).

Accordingly, it would be helpful for the Applicant to clarify:

- how cumulative habitat loss and fragmentation will be assessed at an appropriate landscape scale, including across multiple site parcels and cable routes;
- how functional connectivity and ecological networks will be considered within the cumulative assessment; and
- how the scheme's effects will be assessed in combination with other reasonably foreseeable projects, particularly where incremental effects may give rise to material ecological change.

Providing this clarification would help ensure that cumulative ecological effects are appropriately scoped and that the ES is underpinned by information that is proportionate, transparent and fit for decision-making, consistent with BS 42020:2013. For clarity: these matters are not raised as an objection in-principle, but to reflect an expectation that potential cumulative effects will be robustly considered and resolved through appropriate evidence.

Further clarification is also requested in respect of riparian corridors and farmland bird assemblages. While these receptors are identified within the baseline (Section 6.3), the Scoping Report does not clearly explain how cumulative effects arising from multiple crossings, disturbance, habitat modification or incremental arable habitat change will be assessed in

combination across the scheme and with other reasonably foreseeable projects. This includes cumulative displacement and functional habitat loss for farmland birds, consistent with BS 42020:2013 Clauses 6.2.1(b)(4),(5) and 6.6.1.

Finally, it would be helpful to clarify how construction-phase lighting will be assessed cumulatively, including where temporary lighting may operate concurrently across site parcels, cable routes and riparian corridors. In particular, confirmation is sought that cumulative effects on bats, birds and corridor functionality will be considered within the ES, with uncertainty addressed explicitly, in accordance with BS 42020:2013 Clauses 6.2.1, 6.6.1 and 6.10.

Bat survey methodology

The Scoping Report indicates that bat activity surveys may rely predominantly on static or automated detectors rather than walked dusk/dawn transects. The Bat Conservation Trust (BCT) guidance identifies walked transects (now termed Night-time Bat Walkover surveys) as the standard methodology for bat activity assessment where development may affect commuting routes, foraging habitat and site-wide bat usage (Chapter 8.2, particularly paras 8.2.4–8.2.6). These surveys are intended to provide spatially explicit, real-time interpretation of bat behaviour in relation to habitat features, with static detectors generally used to supplement, rather than replace, transect surveys (paras 8.2.7–8.2.11).

BCT guidance recognises that departures from standard methodologies may be appropriate in certain circumstances; however, where this occurs the guidance is explicit that such departures must be clearly justified, with the ecological rationale, survey limitations and implications for interpretation fully documented (Chapter 1.1, paras 1.1.4–1.1.6; Chapter 2.2, paras 2.2.32–2.2.33). Static and automated detectors are noted to have specific limitations, including their fixed spatial coverage and reduced ability to identify commuting routes and habitat connectivity, which must be acknowledged where they are relied upon as the primary survey method (para 8.2.11).

In addition, BCT guidance links adherence to good practice directly with BS 42020:2013, which requires that published guidance is followed where available and that any deviation is substantiated by evidence and professional judgement (BS 42020 Clause 6.3.6–6.3.7, cited in BCT para 2.2.32). The guidance also requires that survey limitations are clearly identified and their consequences for the robustness of conclusions explained (BS 42020 Clauses 6.7.1–6.7.2, referenced in BCT Chapter 2.6).

On review, the narrative provided within the Scoping Report does not currently set out sufficient justification for departing from the BCT-identified standard

approach, nor does it adequately explain how the limitations of a static detector-led methodology will be acceptably addressed. Further clarification in the context of the full application is therefore requested to provide more substantive rationalisation as to how the proposed survey methodology meets BCT good practice expectations, or alternatively, how any departure from those expectations is justified (e.g., clear improvements to ecological data collection and analysis opportunities, or for demonstrable reasons of surveyors' health and safety etc) and implications fully accounted for.

Reptiles

Table 6-2 indicates that impacts to reptiles are proposed to be scoped-out of the ES, based on assumptions that populations are low and that habitat impacts are localised and largely temporary. Given the scale of the scheme, its linear nature, and the presence of multiple watercourses with associated rough grassland, scrub and marginal habitats within and adjacent to the red line boundary, there remains a reasonable likelihood for species of reptiles to be present at a level where impacts could be materially relevant.

As a UKHab habitat survey is proposed to inform subsequent survey design, it is considered that sufficient baseline information should be available to support an evidence-based scoping decision. On this basis, it is requested that reptiles remain scoped-in to the ES, until completion of baseline habitat assessment, rather than being scoped-out at this early stage.

Birds – adequacy of baseline for EIA purposes

While January and February 2026 winter bird surveys have been completed to date, and while conclusions regarding the absence of functionally linked land to the Severn Estuary Special Protection Area (SPA) may be appropriate for that specific screening exercise, it is recommended that a full season of bird surveys is undertaken to inform the ES.

Given the scale of the scheme, there is potential to support notable populations of priority species and Amber- and Red-listed species (BoCC5). Habitat change associated with the scheme may result in both positive and negative effects on these populations, and only a sufficiently robust baseline will allow these impacts to be properly assessed. This is important to support the Secretary of State in meeting their biodiversity duty under Section 40 of the NERC Act 2006, as strengthened by the Environment Act 2021.

Other priority species and local ecological context

In addition to designated sites and habitats, priority species identified through the Worcestershire LNRS should be considered where suitable habitat or functional connectivity is present. This would help ensure that receptor scoping

and survey design are aligned with locally defined ecological priorities and consistent with the role of the LNRS as a strategic evidence base informing development-related decision-making. Further advice is available at [Worcestershire LNRS Species PM Storymaps](#) and [Worcestershire LNRS Habitat PM Storymaps](#) and can also be provided on request via email: LNRS@Worcestershire.gov.uk

Ancient woodland and veteran trees

The Scoping Report identifies that ancient woodland and/or veteran trees may be present within at least one proposed Cable Route Corridor. As ancient woodland and veteran trees are recognised as irreplaceable habitats, the ES should clearly demonstrate that both direct and indirect impacts (including effects on root protection zones, hydrology, shading, dust deposition and construction disturbance) will be avoided through carefully considered routing, micro-siting and construction methodology.

Habitat baseline evidence, Worcestershire Habitat Inventory and Zone of Influence

In addition to national datasets and the Worcestershire LNRS, the Worcestershire Habitat Inventory (WHI3, available at www.worcestershire.gov.uk/council-services/planning-and-developments/environmental-policy/worcestershire-habitat-inventory) represents a valuable strategic evidence source that should be utilised to inform habitat prioritisation and survey design, particularly where locally important habitats are not fully captured within national datasets.

It is also recommended that the Applicant clearly defines and applies an appropriate buffer around the scheme's red line boundary to articulate the ZoI for ecological assessment. A clearly defined ZoI would assist in ensuring that off-site effects, functional connectivity and indirect impacts are transparently addressed within the baseline, cumulative effects assessment and mitigation design.

Additionally, WCC would like to highlight comments from Worcestershire Wildlife Trust in relation to this 'Ecology and Biodiversity' section of the ES.

They state that in view of the scale of the proposed development, it is clear that there is considerable potential for ecological harm if the development is not progressed in a suitably sensitive manner. In order to inform this process, it would be essential to gather appropriate levels of ecological information, potentially across multiple seasons, in order to develop detailed designs and plans for implementation. Aftercare and long-term management of the solar sites

and ancillary compounds etc. would also be important and should be considered early on as part of this process.

Worcestershire Wildlife Trust are content that the approach to the EIA set out in the Scoping Report is sensible and proportionate and should provide the bulk of the information required by the examining authorities. However, Worcestershire Wildlife Trust would like to make the following specific observations:

- The scale of the development (including the solar array sites, the various CRCs and the implications of traffic and noise etc. associated with construction) mean that the proposed development has potential to have profound impacts on nearby features as well as the land directly developed. The ramifications of this 'offsite' harm need to be as well considered as the on-site impacts on habitats and species. This is especially relevant in relation to designated assets, such as Sites of Special Scientific Interest (SSSIs), but is also important in relation to Local Wildlife Sites, Roadside Verge Nature Reserves, Nature Reserves, [Ancient Semi-Natural Woodland](#) and Veteran Trees, Traditional Orchard, Priority Habitats – especially grassland inventory sites - and sites or commuting corridors of particular importance for wildlife.
- Given the recent publication of the Worcestershire LNRS (and the statutory weight to be attached to it - it should be upgraded to 'policy' from 'guidance ' for Worcestershire as per the Warwickshire commentary in Chapter 6 of the EIA Scoping Report) Worcestershire Wildlife Trust recommend that the EIA process has regard to the guidance in the LNRS in terms of considering relevant buffers to important features and in terms of priority actions that might most effectively go towards mitigating and compensating for any harm arising from the development. It would be helpful for the ES to reference the LNRS in more detail and seek to align locational choices and potential mitigation approaches with the document where appropriate.
- Worcestershire Wildlife Trust are content that the Scoping Report desk studies have picked out the key ecological assets and that they would be given appropriate consideration subject to important caveats set out below.
- Worcestershire Wildlife Trust are content that the Scoping Report picks out key taxa for consideration and that for most part the survey methodologies chosen are proportionate to the proposals. However, there are important caveats to this also set out below.

- In connection with bullet three above, Worcestershire Wildlife Trust wish to particularly highlight the risk of potential impacts on Feckenham Wyldes Moor SSSI arising from the nearby CRC. The risks of contamination or dewatering as a result of trenching works within 130 metres of this important wetland must be fully considered in the ES, including in terms of alternative route choices to limit risk as far as possible.
- It would be important to provide detail on the protection of all watercourses, within and close to the development envelope, both during construction and thereafter. It seems that the proposal is to deliver this protection through an Construction Environmental Management Plan (CEMP) approach but while this is helpful, it does not accord with the mitigation hierarchy in terms of avoidance of harm first and more information on the route choices for the CRC and standoffs from waterbodies on a site by site basis would be helpful as part of the ES.
- In addition, it would be important to consider potential downstream receptors in the event of spills or silt intrusion during construction. The detail on this seems quite light at present and it would be helpful to better understand the protections in place in the event of a failure in the CEMP process.
- Worcestershire Wildlife Trust note the use of embedded mitigation to be detailed in the Development Consent Order (DCO). This is welcome and helpful but must not be used in place of avoidance of harm as a first step. It would be helpful for the ES to set out the procedures by which route choices and field-scale layout will seek to avoid harm before moving to embedded mitigation (for example in relation to noise barriers for noisy items or crossing points for watercourses, hedges etc). In connection with this, it would be helpful to clarify what 'where practicable' means in relation to trenchless river crossings. It will also be important to understand the alternatives used if a trenchless approach cannot be implemented.
- Further to bullet four above, Worcestershire Wildlife Trust note that the bat survey methodology uses just 36 pairs of static detectors. This seems very limited and strongly recommend that the applicant discuss the need for additional survey effort with WCC in-house ecologists. Worcestershire Wildlife Trust are content to defer to their opinions in this regard but feel that additional evidence in relation to bats would be important in the context of the habitats present within the area and the

scale of the proposed development. In addition, Worcestershire Wildlife Trust recommend that close consideration is given to any noise impacts that might affect bats. Ultrasonic sound emissions for noisier items such as BESS may have impacts and so survey work may have to take a particular view on this aspect of the application.

- Also, in connection with bullet four, Worcestershire Wildlife Trust note that winter bird surveys were only conducted very early in the season. This is probably acceptable in the context of the site but again, they recommend additional consideration be given to the need for more information on this aspect of the ES.
- Further to bullet nine, there is very little detail on predicted noise impacts (both from construction and operation) on wildlife generally. This appears to be an oversight and Worcestershire Wildlife Trust strongly recommend that further consideration is given to this in the ES. Impacts may vary by species group, season and duration but should still be considered. A reduction in habitat quality or severance of commuting or foraging corridors may be caused by noise and so positioning of, or mitigation for, noisy items may need further work. Any such steps would need to be informed by appropriate levels of information that are, as yet, absent from the noise and ecological chapters in the Scoping Report.
- Worcestershire Wildlife Trust note the proposed approach to buffering trees and woodland and would recommend that the minimum 15 metres for mature trees and woodland be extended to all trees and hedges to allow for growth during the 60-year lifespan of the proposed protect. This may have ramifications for developable areas and on-site track and panel layouts etc. and so should be considered in the ES.

Landscape and Visual Impact

WCC concurs with the applicant's submitted Scoping Opinion Report that 'Landscape and Visual Impact' should be scoped into the ES.

The County Landscape Officer welcomes that their earlier comments regarding viewpoints have been factored into the Scoping Report and notes that there would be an iterative approach towards consultations with the respective Local Planning Authorities throughout the assessment process.

The County Landscape Officer is satisfied that the landscape assessment methodology and level of detail proposed would be appropriate to assess the range of effects that would result from a scheme of this magnitude. The County

Landscape Officer supports the range of receptors scoped in for assessment and note the Landscape Types and designations that have been flagged as particularly sensitive.

In conclusion, the County Landscape Officer do not consider there to be any additional matters of assessment for inclusion in the Environmental Statement further to those already set out in the Scoping Report.

Historic Environment

WCC concurs with the applicant's submitted Scoping Opinion Report that 'Historic Environment' should be scoped into the ES.

The County Archaeologist agrees with the Scoping Report that the proposed scheme is likely to have significant effects on the environment, including the historic environment. They support those indirect impacts to Designated Assets; Direct and Indirect impacts to non-designated assets; Direct Impacts to Archaeological Remains and the Historic Landscape should all form the scope of the Environmental Statement. The County Archaeologist states that the submitted Scoping Report sets out a satisfactory methodology to assess and understand the likely significant effects of the scheme, including the worst-case scenario for the final cable route.

The County Archaeologist notes that Geophysical Survey is not being undertaken in the CRC search area in Q1 2026. While this is acceptable, bearing in mind the interpretation of geophysics along narrow strips is problematic, the County Archaeologist would recommend that geophysics, where feasible (i.e. where multiple trenches or temporary construction compounds are proposed), is considered to derisk potential route options and to inform any future strategy for further investigation.

Transport and Access

WCC concurs with the applicant's submitted Scoping Opinion Report that 'Transport and Access' should be scoped into the ES.

The County Public Rights of Way Officer comments that they are content that there is enough consideration given to Public Rights of Way in the Scoping Report. The Scoping Report refers to a detailed Public Rights of Way Public Rights of Way Management Plan in subsequent submissions and the applicant's agent has commissioned a separate Public Rights of Way search with the County Public Rights of Way.

The Highway Authority states that they will work collaboratively with the applicant, Warwickshire County Council and National Highways. Due to the majority of development being located within Warwickshire then as Highway Authority they will take their lead regarding assessment on transport matters.

Noise and vibration

WCC concurs with the applicant's submitted Scoping Opinion Report that 'Noise and Vibration' should be scoped into the ES.

Worcestershire Regulatory Services raise no specific comments in that respect.

Where it relates to noise impact on ecology, Worcestershire Wildlife Trust states that there is very little detail on predicted noise impacts (both from construction and operation) on wildlife generally in Scoping Report. This appears to be an oversight and Worcestershire Wildlife Trust strongly recommend that further consideration is given to this in the ES. Impacts may vary by species group, season and duration but should still be considered. A reduction in habitat quality or severance of commuting or foraging corridors may be caused by noise and so positioning of, or mitigation for, noisy items may need further work. Any such steps would need to be informed by appropriate levels of information that are, as yet, absent from the noise and ecological chapters in the Scoping Report.

Ground Conditions and Contamination

WCC concurs with the applicant's submitted Scoping Opinion Report that 'Ground Conditions and Contamination' should be scoped into the ES.

Worcestershire Regulatory Services provided comments relating to contaminated land and potential risks to human health. Worcestershire Regulatory Services consider the approach taken in the Scoping Report generally acceptable. They are in agreement for the further assessment would require to be carried out to determine potential risks from contamination.

Worcestershire Regulatory Services have no adverse comments to raise in respect of the Scoping Report. The proposed contamination assessment should be undertaken to assess potential risks from contamination and inform requirements for any site investigation and subsequent mitigation measures as necessary. All assessment is required to be undertaken by competent persons with the relevant qualification and experience and meet the requirements of the <https://www.gov.uk/government/publications/land-contamination-risk-management-lcrm> and other current industry guidance and best practice.

Significant areas of potential contamination issues have not been identified from the records held by Worcestershire Regulatory Services within Worcestershire for the site areas provided as much as can be ascertained from the available information. Much of the site appears to be agricultural land with the exception of the electricity substation in Feckenham (Worcestershire Regulatory Services reference 14/00437/HM – Electrical Production and Distribution) which is shown on historical maps dated c. 1968/75 onwards. This feature also includes two small, infilled ground features (ditch and a pond) that appear to have been infilled to make way for the substation.

In addition, another feature is highlighted as a potential contaminated land concern within the Worcestershire Regulatory Services records located in Wychavon although this has not been included within the Scoping Report. This is identified as 'Bidford Gliding Centre Airport, Buckle Street', reference WD/44/CL, which is located within site 3C and in the vicinity of 3B.

Whilst significant areas of landfill or made ground have not been noted within the Worcestershire Regulatory Services records relevant to the site there may be natural or unknown sources of ground gas present. The Scoping Report states that there would be no risks from ground gas associated with the proposal due to features either being external or sufficiently ventilated. However, Worcestershire Regulatory Services would recommend that particular attention is paid to areas of potential ground gas risk where confined spaces or buildings are proposed, such as switch rooms, inspection pits, or other buildings. Ground gas may accumulate in such areas if present and can therefore present a risk to site users / operatives. Further information should be provided in relation to the ventilation aspects of such spaces to demonstrate this.

Water Environment

Whilst WCC does not object to scoping out 'Water Environment' from the ES in principle, the Planning Inspectorate should satisfy themselves that this is appropriate, in particular, where it relates to the overlap between the water environment and ecological impacts.

Worcestershire Wildlife Trust comment in relation to this that:

- Given the number of waterbodies and watercourses in the study area it would be helpful to have more detail on the justification for scoping out wetland invertebrates, especially in relation to high value assets such as LWS watercourses, several of which are within or close to the proposed solar arrays.

- Given the number of waterbodies and watercourses in the study area it would be helpful to have more detail on the justification for scoping out wetland invertebrates, especially in relation to high value assets such as LWS watercourses, several of which are within or close to the proposed solar arrays.

The Local Lead Flood Authority, however, are content that flooding and drainage could be scoped out of the ES.

The proposed development's site area is of course extensive, but the Local Lead Flood Authority agree with the Scoping Report that the effects of flooding and drainage on the proposal, and in turn, the proposal's effects on flooding and drainage, and in both cases, in the construction and operation phases, can all be properly and effectively mitigated, and that this mitigation can be effectively managed through the normal planning process, outside of the EIA process.

Air Quality

WCC concurs with the applicant's submitted Scoping Opinion Report that 'Air Quality' could be scoped out from the ES.

Worcestershire Regulatory Services raised no issues in relation to air quality in their comments.

From: [REDACTED]@worcestershire.gov.uk>
Sent: 07 April 2026 09:07
To: [REDACTED]@worcestershire.gov.uk>
Subject: RE: EIA Scoping Opinion Request for Arrow Valley Solar NSIP

Hello [REDACTED] I've had a look at the scoping documents and am content that there is enough consideration given to PRow at this stage. There is promise of a more detailed PRow management plan in subsequent submissions and the applicant's agent has commissioned a separate PRow search which I am about half way through.

Given the existing PRow considerations and the separate PRow search, I am content that the level of PRow detail is sufficient at this stage.

Kind Regards

[REDACTED]

[REDACTED]

Mapping Officer

Public Rights of Way Team

Worcestershire County Council

Wildwood

Wildwood Drive, Worcester, WR5 2QT

Tel: 01905 846834

Email: [REDACTED]@worcestershire.gov.uk

www.worcestershire.gov.uk/countryside



From: [REDACTED]@worcestershire.gov.uk>

Sent: 14 April 2026 15:50

To: [REDACTED]@worcestershire.gov.uk>

Cc: [REDACTED]@worcestershire.gov.uk>; [REDACTED]
[REDACTED]@worcestershire.gov.uk>

Subject: RE: EIA Scoping Opinion Request for Arrow Valley Solar NSIP - archaeology

Dear [REDACTED],

I agree that the proposed scheme is likely to have significant effects on the environment, including the historic environment, and therefore I support the inclusion of heritage, notably - **Indirect impacts to Designated Assets; Direct and Indirect impacts to non-designated assets; Direct Impacts to Archaeological Remains** and the **Historic Landscape** – within the scope of the Environmental Statement. The submitted Scoping Report sets out a satisfactory methodology to assess and understand the likely significant effects of the scheme, including the worst case scenario for the final cable route.

I note that Geophysical Survey is not being undertaken in the CRC search area in Q1 2026. While this is acceptable, bearing in mind the interpretation of geophysics along narrow strips is problematic, I would recommend that geophysics, where feasible (i.e. where multiple trenches or temporary construction compounds are proposed), is considered to derisk potential route options and to inform any future strategy for further investigation.

Best Wishes

[REDACTED]

[REDACTED]

Historic Environment Advisor

Worcestershire Archive and Archaeology Service

Worcestershire County Council
The Hive, Sawmill Walk, The Butts, Worcester, WR1 3PD

Tel: 01905 844874

Service Feedback: Please let us know how we did:

<https://forms.office.com/e/braeVJLq00>

From: [REDACTED]@worcestershire.gov.uk>

Sent: 15 April 2026 11:08

To: [REDACTED]@worcestershirewildlifetrust.org>; [REDACTED]

[REDACTED]@worcestershire.gov.uk>

Cc: [REDACTED]@worcestershire.gov.uk>; [REDACTED]

[REDACTED]@worcestershire.gov.uk>

Subject: RE: Your Ref: 26/001/NSIP - EIA scoping for Arrow Valley Solar

Dear [REDACTED]

Thank you for sharing and co-ordinating responses for this consultation. The WCC Environmental Policy team would like to offer the following comments on the submitted EIA Scoping Report, with specific regards to protected and notable species and habitats, designated sites, and the HRA and BNG regimes. We hope this is helpful in guiding detailed survey methodologies and in positively supporting the preparation of an Environmental Statement and EIA for the development proposals in due course.

Biodiversity Net Gain (BNG)

At present, the statutory Biodiversity Net Gain (BNG) requirement introduced through the Environment Act 2021 is not yet mandatory for Nationally Significant Infrastructure Projects (NSIPs), with commencement subject to separate secondary legislation and transitional arrangements. However, Government policy and guidance make clear the expectation that NSIPs should anticipate BNG requirements and align with the

principles of BNG delivery, particularly where applications are likely to be submitted following formal commencement.

In anticipation of this requirement, it is recommended that the survey strategy includes robust baseline habitat surveys, undertaken at appropriate times of year to capture seasonal variation and, where necessary, over sufficient periods. A single broad survey window (e.g. April–September, as indicated in Table 6-1) may not be appropriate for all habitat types; for example, woodland ground flora surveys in this region are typically most effective between mid-March and late April. Survey timing should therefore be tailored to habitat type to ensure BNG calculations are based on a robust and defensible evidence base.

On the assumption that the BNG requirement is activated at the point of application submission, it is expected that BNG would be delivered in accordance with the BNG hierarchy, prioritising on-site habitat retention, enhancement and creation ahead of off-site measures or statutory credits. Early integration of BNG within scheme design is therefore anticipated, with habitats designed to be ecologically coherent, deliverable, and capable of being secured through long-term management arrangements, rather than relying on late-stage compensation.

Where on-site landscaping and habitat creation align with UKHab habitat codes identified within the adopted LNRS mapped measures, there is an opportunity to deliver enhanced outcomes, including uplift in strategic significance scoring within the BNG metric. Alignment of BNG delivery with LNRS priorities can therefore provide dual benefits: supporting landscape-scale nature recovery objectives while strengthening the robustness and efficiency of BNG delivery for NSIP schemes, particularly where works are associated with linear or energy-infrastructure development.

In addition to Local Nature Recovery Strategy (LNRS) mapped measures, there is opportunity to strengthen scheme outcomes by reference to other mapped and non-mapped local priorities, including the Worcestershire Biodiversity Action Plan (BAP) and the Worcestershire Pollinator Strategy. While the installation of bee hives is noted, this is not generally aligned with pollinator recovery objectives and may risk localised competition with wild pollinators; the integration of bee banks and wild pollinator nesting features, linked to species-rich grassland and native wildflower habitats, would be more consistent with local strategy objectives. Similarly, where bird boxes are proposed, greater biodiversity benefit and strategic relevance would be achieved through consideration of a dedicated swift tower or pole-mounted barn owl boxes, particularly where these align with open farmland or infrastructure-associated habitats. Such measures would complement LNRS priorities, support priority species, and deliver targeted enhancement that is more functionally robust and locally appropriate.

Local Nature Recovery Strategy (LNRS)

The Scoping Report describes the ecological baseline primarily through reference to statutory and non-statutory site designations (Section 6.3). Further clarification is requested to confirm how the emerging LNRS has informed the identification of ecological constraints and enhancement opportunities.

It is not clear whether all Areas of Particular Importance for Biodiversity (APIB) identified through the LNRS evidence base have been systematically reviewed and treated as potential ecological constraints at scoping stage. By way of example, Local Grassland Inventory sites, which are included within the LNRS APIB layer, do not appear to be consistently reflected within the baseline or constraints mapping presented. Clarification is therefore sought on whether LNRS-defined APIB have informed the definition of the baseline, the Zone of Influence and the scoping of effects, consistent with BS 42020:2013 Clause 6.2.1(b)(5).

In addition, while the Scoping Report refers in general terms to mitigation and enhancement (Section 6.4), further clarification is requested on how LNRS Areas that Could Become of Particular Importance for Biodiversity (ACB) have informed early identification of enhancement opportunities. In particular, clarification is sought on how LNRS Potential Measure (PM) 48 – “energy infrastructure development sites” has been considered at scoping stage, including opportunities for habitat creation, restoration and strengthening of ecological networks associated with the Scheme. Further information available at:

<https://storymaps.arcgis.com/collections/e40dd88149da4a0f9c98c43ffa3efafe?item=48>

Clear signposting to LNRS priorities within the EIA would assist in demonstrating alignment with LNRS objectives and the mitigation hierarchy, consistent with BS 42020 Clause 5.2.

HRA screening and compliance

The position set out in Table 6-2, indicating that a formal HRA Screening Report will not be required, can be consistent in principle with government guidance and Planning Inspectorate advice provided that likely significant effects on European sites can be robustly excluded on the basis of objective information. Even where no likely significant effects are identified, sufficient information must still be provided to enable the competent authority to lawfully reach that conclusion.

In this context, the explanatory narrative in Table 6-1, setting out why land is not considered functionally linked to a Natura 2000 site, is helpful and aligns with good practice. However, Planning Inspectorate guidance for NSIPs is clear that screening conclusions should be formally documented, typically through a No Significant Effects Report (NSER). Accordingly, while the scoping approach is directionally compliant, the

conclusions currently signposted in Tables 6-1 and 6-2 should be drawn together into a clear and auditable HRA screening outcome at application stage.

Watercourses, fish and functional linkage

It is noted that impacts to watercourses and fish appear to be scoped out of the Environmental Statement. However, the River Avon and Bow Brook interact with, or are in proximity to the Scheme's red line boundary, and therefore warrant careful consideration. These watercourses should be considered not only in relation to direct and indirect impacts on aquatic and riparian biodiversity, but also in the context of potential functional linkage to the Severn Estuary SAC/Ramsar site, noting previous correspondence with Natural England has identified the importance of upstream pathways.

Further clarification is therefore requested on the rationale for scoping-out these receptors and on how hydrological connectivity and pathway effects will be addressed within the assessment framework, including in-combination considerations.

Survey Timing

The Scoping Report identifies that a range of ecology surveys will be required to inform the Environmental Statement (Section 6.3, including Table 6-1), several of which are inherently season-dependent (e.g. bats, breeding and wintering birds, great crested newt, reptiles).

However, further clarification is requested to ensure consistency with BS 42020:2013 in relation to survey timing, disclosure of limitations and certainty for decision-makers.

In particular:

- Section 6.3 and Table 6-1 set out proposed surveys but do not specify the optimal seasonal survey windows for key receptors, nor whether surveys can realistically be completed within those windows to inform the ES. Clarification is requested on this point, having regard to BS 42020 Clause 6.4.4 and Clause 6.2.1(b)(6).
- Section 6.7 (Assumptions and Limitations) acknowledges that surveys may be subject to constraints, but does not clearly explain the implications of seasonal constraints for data adequacy or confidence in subsequent assessment conclusions. BS 42020 expects timing and seasonal constraints to be identified as limitations, with their consequences explained (Clauses 6.7.1(a)(6) and 6.7.2).
- Section 6.5 (Assessment Methodology) does not describe how uncertainty arising from incomplete or seasonally constrained surveys would be treated within the assessment (e.g. via precautionary assumptions or sensitivity

adjustments). Clarification on the proposed approach (particularly with reference to implications in the application of the Rochdale Envelope) would assist in demonstrating certainty and transparency, in line with BS 42020 Clause 6.6.1 and Clause 6.10.

Cumulative ecological effects

The Scoping Report identifies that cumulative effects will be considered within the EIA (Section 6.6, with wider reference to cumulative assessment methodology in Chapter 2.4). However, further clarification is requested specifically in relation to cumulative habitat loss, fragmentation and functional connectivity across the scheme's Zol and at the landscape scale, in order to ensure alignment with BS 42020:2013. In particular:

- Section 6.3 (Baseline Environment) describes habitats and designated sites largely at a site-by-site level across the Scheme parcels and Cable Route Corridors, but does not clearly set out a landscape-scale ecological context, including the role of the Site(s) within wider habitat networks or ecological corridors. Clarification is requested on how habitat connectivity and fragmentation will be considered, having regard to BS 42020 Clause 6.2.1(b)(5) (coverage of a sufficiently wide area commensurate with the requirements of the features affected).
- Table 6-1 (Preliminary Baseline and Requirements for Further Survey) focuses on receptor-specific survey needs but does not address how incremental habitat loss and severance arising from multiple Site parcels and linear infrastructure (CRCs) will be assessed cumulatively. Further information is requested on how cumulative habitat effects will be scoped and assessed, consistent with BS 42020 Clause 6.2.1(b)(4) and (5) (ecological processes and connected systems).
- Section 6.6 (Likely Significant Effects) identifies potential effects on habitats and species, but provides limited explanation of how in-combination effects will be assessed where multiple elements of the Scheme interact (e.g. multiple land parcels, substations, and cable routes), or where the Scheme interacts with other reasonably foreseeable projects. BS 42020 expects cumulative and in-combination effects to be identified where relevant, even where individual effects may be limited (Clauses 6.2.1 and 8.1).
- The Scoping Report does not clearly explain how habitat function, not just habitat extent, will be considered when assessing cumulative effects (e.g. loss or weakening of stepping-stone habitats, disruption of commuting or dispersal routes). Clarification on the proposed approach would assist, in line with BS 42020 Clause 5.2 (mitigation hierarchy) and Clause 6.6.1 (certainty and clarity for decision-makers).

Accordingly, it would be helpful for the Applicant to clarify:

- how cumulative habitat loss and fragmentation will be assessed at an appropriate landscape scale, including across multiple Site parcels and cable routes;
- how functional connectivity and ecological networks will be considered within the cumulative assessment; and
- how the Scheme's effects will be assessed in combination with other reasonably foreseeable projects, particularly where incremental effects may give rise to material ecological change.

Providing this clarification would help ensure that cumulative ecological effects are appropriately scoped and that the Environmental Statement is underpinned by information that is proportionate, transparent and fit for decision-making, consistent with BS 42020:2013. For clarity: these matters are not raised as an objection in-principle, but to reflect an expectation that potential cumulative effects will be robustly considered and resolved through appropriate evidence.

Further clarification is also requested in respect of riparian corridors and farmland bird assemblages. While these receptors are identified within the baseline (Section 6.3), the Scoping Report does not clearly explain how cumulative effects arising from multiple crossings, disturbance, habitat modification or incremental arable habitat change will be assessed in combination across the Scheme and with other reasonably foreseeable projects. This includes cumulative displacement and functional habitat loss for farmland birds, consistent with BS 42020:2013 Clauses 6.2.1(b)(4),(5) and 6.6.1.

Finally, it would be helpful to clarify how construction-phase lighting will be assessed cumulatively, including where temporary lighting may operate concurrently across Site parcels, cable routes and riparian corridors. In particular, confirmation is sought that cumulative effects on bats, birds and corridor functionality will be considered within the EIA, with uncertainty addressed explicitly, in accordance with BS 42020:2013 Clauses 6.2.1, 6.6.1 and 6.10.

Bat survey methodology

The Scoping Report indicates that bat activity surveys may rely predominantly on static or automated detectors rather than walked dusk/dawn transects. BCT guidance identifies walked transects (now termed Night-time Bat Walkover surveys) as the standard methodology for bat activity assessment where development may affect commuting routes, foraging habitat and site-wide bat usage (Chapter 8.2, particularly paras 8.2.4–8.2.6). These surveys are intended to provide spatially explicit, real-time interpretation of bat behaviour in relation to habitat features, with static detectors

generally used to supplement, rather than replace, transect surveys (paras 8.2.7–8.2.11).

BCT guidance recognises that departures from standard methodologies may be appropriate in certain circumstances; however, where this occurs the guidance is explicit that such departures must be clearly justified, with the ecological rationale, survey limitations and implications for interpretation fully documented (Chapter 1.1, paras 1.1.4–1.1.6; Chapter 2.2, paras 2.2.32–2.2.33). Static and automated detectors are noted to have specific limitations, including their fixed spatial coverage and reduced ability to identify commuting routes and habitat connectivity, which must be acknowledged where they are relied upon as the primary survey method (para 8.2.11).

In addition, BCT guidance links adherence to good practice directly with BS 42020:2013, which requires that published guidance is followed where available and that any deviation is substantiated by evidence and professional judgement (BS 42020 Clause 6.3.6–6.3.7, cited in BCT para 2.2.32). The guidance also requires that survey limitations are clearly identified and their consequences for the robustness of conclusions explained (BS 42020 Clauses 6.7.1–6.7.2, referenced in BCT Chapter 2.6).

On review, the narrative provided within the Scoping Report does not currently set out sufficient justification for departing from the BCT-identified standard approach, nor does it adequately explain how the limitations of a static detector-led methodology will be acceptably addressed. Further clarification in the context of the full application is therefore requested to provide more substantive rationalisation as to how the proposed survey methodology meets BCT good practice expectations, or alternatively, how any departure from those expectations is justified (eg, clear improvements to ecological data collection and analysis opportunities, or for demonstrable reasons of surveyors' health and safety etc) and implications fully accounted for.

Reptiles

Table 6-2 indicates that impacts to reptiles are proposed to be scoped-out of the Environmental Statement, based on assumptions that populations are low and that habitat impacts are localised and largely temporary. Given the scale of the Scheme, its linear nature, and the presence of multiple watercourses with associated rough grassland, scrub and marginal habitats within and adjacent to the red line boundary, there remains a reasonable likelihood for species of reptiles to be present at a level where impacts could be materially relevant.

As a UKHab habitat survey is proposed to inform subsequent survey design, it is considered that sufficient baseline information should be available to support an evidence-based scoping decision. On this basis, it is requested that reptiles remain scoped-in to the EIA, until completion of baseline habitat assessment, rather than being scoped-out at this early stage.

Birds – adequacy of baseline for EIA purposes

While January and February 2026 winter bird surveys have been completed to date, and while conclusions regarding the absence of functionally linked land to the Severn Estuary SPA may be appropriate for that specific screening exercise, it is recommended that a full season of bird surveys is undertaken to inform the EIA.

Given the scale of the Scheme, there is potential to support notable populations of priority species and Amber- and Red-listed species (BoCC5). Habitat change associated with the Scheme may result in both positive and negative effects on these populations, and only a sufficiently robust baseline will allow these impacts to be properly assessed. This is important to support the Secretary of State in meeting their biodiversity duty under Section 40 of the NERC Act 2006, as strengthened by the Environment Act 2021.

Other priority species and local ecological context

In addition to designated sites and habitats, priority species identified through the Worcestershire Local Nature Recovery Strategy should be considered where suitable habitat or functional connectivity is present. This would help ensure that receptor scoping and survey design are aligned with locally defined ecological priorities and consistent with the role of the LNRS as a strategic evidence base informing development-related decision-making. Further advice is available at [Worcestershire LNRS Species PM Storymaps](#) and [Worcestershire LNRS Habitat PM Storymaps](#) and can also be provided on request via email: LNRS@Worcestershire.gov.uk

Ancient woodland and veteran trees

The Scoping Report identifies that ancient woodland and/or veteran trees may be present within at least one proposed Cable Route Corridor. As ancient woodland and veteran trees are recognised as irreplaceable habitats, the EIA should clearly demonstrate that both direct and indirect impacts (including effects on root protection zones, hydrology, shading, dust deposition and construction disturbance) will be avoided through carefully considered routeing, micro-siting and construction methodology.

Habitat baseline evidence, Worcestershire Habitat Inventory and Zone of Influence

In addition to national datasets and the Worcestershire LNRS, the Worcestershire Habitat Inventory (WHI3, available at www.worcestershire.gov.uk/council-services/planning-and-developments/environmental-policy/worcestershire-habitat-inventory) represents a valuable strategic evidence source that should be utilised to inform habitat prioritisation and survey design, particularly where locally important habitats are not fully captured within national datasets.

It is also recommended that the Applicant clearly defines and applies an appropriate buffer around the Scheme's red line boundary to articulate the Zone of Influence (Zol) for ecological assessment. A clearly defined Zol would assist in ensuring that off-site effects, functional connectivity and indirect impacts are transparently addressed within the baseline, cumulative effects assessment and mitigation design.

I hope the information is helpful, but if you have any questions or require any additional clarification, please don't hesitate to contact me

Many thanks

██████████

From: LLFA Planning <LLFAPlanning@worcestershire.gov.uk>

Sent: 16 April 2026 16:26

To: ██████████@worcestershire.gov.uk

Subject: RE: EIA Scoping Opinion Request for Arrow Valley Solar NSIP

Hi ██████████

Many thanks for the gentle reminder.

I've reviewed the submitted documents and I am content that matters of flooding and drainage are 'scoped out' of the EIA.

The proposed development's site area is of course extensive, but I agree that the effects of flooding and drainage on the proposal, and in turn, the proposal's effects on flooding and drainage, and in both cases, in the construction and operation phases, can all be properly and effectively mitigated, and that this mitigation can be effectively managed through the *normal* planning process, outside of the EIA process.

Best wishes

[REDACTED]

[REDACTED]

Senior Flood Risk Management Officer

Flood Risk Management Team

Worcestershire County Council

County Hall, Spetchley Road, Worcester, WR5 2NP

Tel: 01905 844135

Email: [REDACTED]@worcestershire.gov.uk

From: [REDACTED]@worcestershirowildlifetrust.org>

Sent: 15 April 2026 08:27

To: [REDACTED]@worcestershire.gov.uk>

Cc: [REDACTED]@worcestershire.gov.uk>

Subject: [WCC EXTERNAL]Your Ref: 26/001/NSIP - EIA scoping for Arrow Valley Solar

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Dear [REDACTED]

Thank you for sending us details of this application. We note the contents of the various associated documents and in particular the commentary set out in the Environmental

Impact Assessment (EIA) Scoping Report (Document Reference - AVS-ATR-GEN-AA-DOC-ENV-000001) by Arrow Valley Solar.

In view of the scale of the proposed development, it is clear that there is considerable potential for ecological harm if the development is not progressed in a suitably sensitive manner. In order to inform this process it will be essential to gather appropriate levels of ecological information, potentially across multiple seasons, in order to develop detailed designs and plans for implementation. Aftercare and long term management of the solar sites and ancillary compounds etc. will also be important and should be considered early on as part of this process.

As you would expect, the comments set out below are limited to ecological considerations in Worcestershire only. Noting that matters of landscape and visual amenity, traffic and transport and drainage / flood defence may also be significant in this case our silence on those issues, or other relevant matters, should not be taken to diminish their importance. We recommend that you consult specialists in the relevant disciplines for a fully informed view to help with your deliberations.

For the most part we are content that the approach to the EIA set out in the scoping report is sensible and proportionate and should provide the bulk of the information required by the examining authorities. However, we would like to make the following specific observations in relation to the EIA scoping in the hope that they might help to inform your response to PINS and the Secretary of State.

1. The scale of the development (including the solar array sites, the various CRCs and the implications of traffic and noise etc. associated with construction) mean that the proposed development has potential to have profound impacts on nearby features as well as the land directly developed. The ramifications of this 'offsite' harm need to be as well considered as the on-site impacts on habitats and species. This is especially relevant in relation to designated assets, such as SSSIs, but is also important in relation to Local Wildlife Sites, Roadside Verge Nature Reserves, Nature Reserves, ASNW and Veteran Trees, Traditional Orchard, Priority Habitats – especially grassland inventory sites - and sites or commuting corridors of particular importance for wildlife.
2. Given the recent publication of the Worcestershire LNRS (and the statutory weight to be attached to it - it should be upgraded to 'policy' from 'guidance' for Worcestershire as per the Warwickshire commentary in Chapter 6 of the EIA scoping report) we recommend that the EIA process has regard to the guidance in the LNRS in terms of considering relevant buffers to important features and in terms of priority actions that might most effectively go towards mitigating and compensating for any harm arising from the development. It would be helpful for

the EIA to reference the LNRS in more detail and seek to align locational choices and potential mitigation approaches with the document where appropriate.

3. Thus far, we are content that the scoping report desk studies have picked out the key ecological assets and that they will be given appropriate consideration subject to important caveats set out below.
4. We are similarly content that the scoping report picks out key taxa for consideration and that for most part the survey methodologies chosen are proportionate to the proposals. However, there are important caveats to this also set out below.
5. In connection with bullet three above, we wish to particularly highlight the risk of potential impacts on Feckenham Wylde Moor SSSI arising from the nearby CRC. The risks of contamination or dewatering as a result of trenching works within 130m of this important wetland must be fully considered in the EIA, including in terms of alternative route choices to limit risk as far as possible.
6. It will be important to provide detail on the protection of all watercourses, within and close to the development envelope, both during construction and thereafter. It seems that the proposal is to deliver this protection through an oCEMP approach but while this is helpful, it does not accord with the mitigation hierarchy in terms of avoidance of harm first and more information on the route choices for the CRC and standoffs from waterbodies on a site by site basis would be helpful as part of the EIA.
7. In addition, it will be important to consider potential downstream receptors in the event of spills or silt intrusion during construction. The detail on this seems quite light at present and it would be helpful to better understand the protections in place in the event of a failure in the CEMP process.
8. We note the use of embedded mitigation to be detailed in the DCO. This is welcome and helpful but must not be used in place of avoidance of harm as a first step. It would be helpful for the EIA to set out the procedures by which route choices and field-scale layout will seek to avoid harm before moving to embedded mitigation (for example in relation to noise barriers for noisy items or crossing points for watercourses, hedges etc). In connection with this, it would be helpful to clarify what 'where practicable' means in relation to trenchless river crossings. It will also be important to understand the alternatives used if a trenchless approach cannot be implemented.
9. Further to bullet four above, we note that the bat survey methodology uses just 36 pairs of static detectors. This seems very limited to us and we strongly recommend that you discuss the need for additional survey effort with your in-

house ecologists. We are content to defer to their opinions in this regard but feel that additional evidence in relation to bats will be important in the context of the habitats present within the area and the scale of the proposed development. In addition, we recommend that close consideration is given to any noise impacts that might affect bats. Ultrasonic sound emissions for noisier items such as BESS may have impacts and so survey work may have to take a particular view on this aspect of the application.

10. Also in connection with bullet four, we note that winter bird surveys were only conducted very early in the season. This is probably acceptable in the context of the site but again, we recommend additional consideration be given to the need for more information on this aspect of the EIA.
11. Further to bullet nine, there is very little detail on predicted noise impacts (both from construction and operation) on wildlife generally. This appears to be an oversight and we strongly recommend that further consideration is given to this in the EIA. Impacts may vary by species group, season and duration but should still be considered. A reduction in habitat quality or severance of commuting or foraging corridors may be caused by noise and so positioning of, or mitigation for, noisy items may need further work. Any such steps would need to be informed by appropriate levels of information that are, as yet, absent from the noise and ecological chapters in the scoping report.
12. We note the proposed approach to buffering trees and woodland and would recommend that the minimum 15m for mature trees and woodland be extended to all trees and hedges to allow for growth during the 60-year lifespan of the proposed protect. This may have ramifications for developable areas and on-site track and panel layouts etc. and so should be considered in the EIA.
13. Given the number of waterbodies and watercourses in the study area it would be helpful to have more detail on the justification for scoping out wetland invertebrates, especially in relation to high value assets such as LWS watercourses, several of which are within or close to the proposed solar arrays.

I hope that these comments are of use to you but please do not hesitate to contact us again if we can be of further assistance.

Best Wishes,



[REDACTED]
Head of Conservation

From: [REDACTED]@worcestershire.gov.uk>
Sent: 17 April 2026 22:56
To: [REDACTED]@worcestershire.gov.uk>
Cc: [REDACTED]@worcestershire.gov.uk>
Subject: RE: EIA Scoping Opinion Request for Arrow Valley Solar NSIP

Dear [REDACTED]

Thank you for your consultation.

Having reviewed the submitted EIA Scoping Opinion Report and its accompanying documents, I concur that the scheme will result in a significant environmental effect that will include specific and significant landscape and visual effects. I therefore welcome the inclusion of landscape as a component of the EIA and broadly support the scope and LVIA level of assessment proposed (based on GLVIA3).

The landscape consultant for the applicant contacted us for landscape pre-application comments and to review photo viewpoints. I welcome that our comments have been factored into the Scoping Opinion Report and note there will be an iterative approach towards consultations with the respective Local Planning Authorities throughout the assessment process.

I am therefore satisfied that the landscape assessment methodology and level of detail proposed will be appropriate to assess the range of effects that will result from a scheme of this magnitude. Equally, I support the range of receptors scoped in for assessment and note the Landscape Types and designations that have been flagged as particularly sensitive.

In conclusion, I do not consider there to be any additional matters of assessment for inclusion in the Environmental Statement further to those already set out in the EIA Scoping Opinion Report.

Kind regards,

[REDACTED]

[REDACTED]

Landscape Advisor

Worcestershire County Council
County Hall, Spetchley Road, Worcester, WR5 2NP

Tel: 01905 844873

Email: [REDACTED]@worcestershire.gov.uk

From: [REDACTED]@worcsregservices.gov.uk>

Sent: 20 April 2026 11:05

To: [REDACTED]@worcestershire.gov.uk>

Subject: [WCC EXTERNAL]RE: EIA Scoping Opinion Request for Arrow Valley Solar NSIP

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Hi [REDACTED]

Apologies, the service request was closed before it should have been.

Noise / Nuisance: No comments.

Regards,

[REDACTED]

Senior Technical Officer (Technical Services)

Tel: [REDACTED]

Wyre Forest House, Finepoint Way, Kidderminster, Worcestershire, DY11 7WF

Mobile: [REDACTED]

Fax: 01562 745516

E-mail: [REDACTED]@worcsregservices.gov.uk

From: [REDACTED]@worcsregservices.gov.uk>

Sent: 20 April 2026 15:16

To: [REDACTED]@worcestershire.gov.uk>

Subject: [WCC EXTERNAL]RE: EIA Scoping Opinion Request for Arrow Valley Solar NSIP

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Dear [REDACTED]

Thank you for the opportunity to comment on this Scoping Opinion in respect of air quality. WRS Technical Services (Pollution Team) has reviewed the available records and documents and do not perceive a need for an Air Quality Assessment in this instance.

Yours sincerely,

[REDACTED]

[REDACTED]

Technical Officer

Tel: [REDACTED]

Wyre Forest House, Finepoint Way, Kidderminster, Kidderminster, DY11 7WF

E-mail: [REDACTED]@worcsregservices.gov.uk

From: [REDACTED]@worcestershire.gov.uk>
Sent: 23 April 2026 10:02
To: [REDACTED]@worcestershire.gov.uk>
Subject: Arrow Valley NSIP

Hi [REDACTED]

As discussed, my words be as follows.

Worcestershire County Council, in its capacity as Highway Authority, will work collaboratively with the applicant, Warwickshire County Council and National Highways. Due to the majority of development being located within Warwickshire then as Highway Authority we will take their lead regarding assessment on transport matters.

Thanks

[REDACTED]
[REDACTED]

Highways Development Management & Control Manager
Directorate of Economy and Infrastructure
Worcestershire County Council
County Hall, Spetchley Road, Worcester, WR5 2NP

Telephone: [REDACTED]
Mobile Number: [REDACTED]
Email: [REDACTED].gov.uk



From: [REDACTED]@worcsregservices.gov.uk>

Sent: 10 April 2026 12:23

To: [REDACTED]@worcestershire.gov.uk>; [REDACTED]

[REDACTED]@bromsgroveandredditch.gov.uk>; [REDACTED]

[REDACTED]@bromsgroveandredditch.gov.uk>; [REDACTED]

[REDACTED]@worcestershire.gov.uk>

Subject: [WCC EXTERNAL]FW: EIA Scoping Opinion Request for Arrow Valley Solar NSIP

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Dear all,

Our References – 26/02917/PLAN & 26/03239/PLAN

Contaminated Land

Thank you for the recent planning consultations relating to the request for scoping opinion references **26/0001/NSIP (WCC), 26/00383/EOR (BDC / RBC) - Arrow Vally Solar and Battery Storage.**

Worcestershire Regulatory Services (WRS) have reviewed the proposal in relation to contaminated land. This has included a review of the document entitled “*Environmental Impact Assessment (EIA) Scoping Report - Volume I Main Report*”, Arrow Valley Solar, Document Reference AVS-ATR-GEN-AA-DOC-ENV-000001, dated March 2026, and reference to the other submitted documents and plans.

The WRS comments are based on the information we have for Worcestershire in the districts of Redditch Borough Council and Wychavon District Council (largely includes parts of sites 1 and 3, site 4 and areas of the cable route corridor). WRS do not have access to contaminated land records outside of the county. These comments relate to contaminated land and potential risks to human health.

Chapter 7 of the EIA Scoping Report specifically covers Ground Conditions and Contamination and sets out the scope for the proposed assessment, providing a summary of ground conditions and potential sources of contamination. The chapter includes a review of available historical and environmental information. The report sets out the sources of contamination which generally include made ground associated with various features, the electricity substation at Feckenham, and general impacts from farming and agriculture.

The report outlines that some mitigation measures will be incorporated and managed as part of the construction process including considerations within the design, implementation of a soils management plan where excavation of soils is undertaken, environmental management plans and various health and safety procedures adopted during the construction process.

Further assessment is proposed for potential risks to human health in relation to *“effects from contamination associated with potential on-site current and historical sources, and those off-site in the Study Area which may migrate to the Site in soil derived dusts or groundwater (all Sub-Sites and CRC areas)”*.

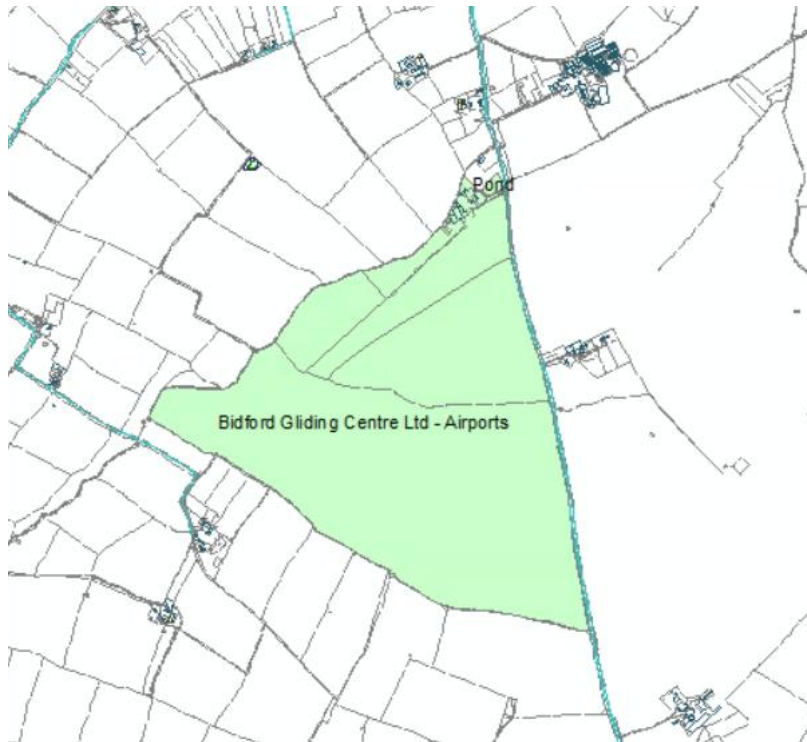
Other potential sources (such as those arising during construction) have been scoped out of the assessment as they are to be managed through *“best practice construction methods and operational procedures and monitoring to be detailed in the CEMP and OEMP”*. Risks from ground gas have also been scoped out as they are to be managed through design, with *“no proposed enclosed structures as part of the Scheme within which ground gas may accumulate. The solar arrays, substations, sub distribution switch rooms, conversion units, BESS and ancillary development are either external or sufficiently ventilated”* (Table 7-5, page 228).

WRS Comments and Recommendations

The proposals are generally found to be acceptable. WRS are in agreement for the further assessment to be carried out to determine potential risks from contamination.

Significant areas of potential contamination issues have not been identified from the records held by WRS within Worcestershire for the site areas provided as much as can be ascertained from the available information. The majority of the site appears to be agricultural land with the exception of the electricity substation in Feckenham (WRS reference 14/00437/HM – Electrical Production and Distribution) which is shown on historical maps dated c. 1968/75 onwards. This feature also includes two small, infilled ground features (ditch and a pond) that appear to have been infilled to make way for the substation.

In addition, another feature is highlighted as a potential contaminated land concern within the WRS records located in Wychavon although this has not been included within the EIA report. This is identified as 'Bidford Gliding Centre Airport, Buckle Street', reference WD/44/CL, which is located within site 3C and in the vicinity of 3B. A screen shot from the WRS records showing this feature is set out below: -



Whilst significant areas of landfill or made ground have not been noted within the WRS records relevant to the site there may be natural or unknown sources of ground gas present. The EIA statement reports that there will be no risks from ground gas associated with the proposal due to features either being external or sufficiently ventilated. However, WRS would recommend that particular attention is paid to areas of potential ground gas risk where confined spaces or buildings are proposed, such as switch rooms, inspection pits, or other buildings. Ground gas may accumulate in such areas if present and can therefore present a risk to site users / operatives. Further information should be provided in relation to the ventilation aspects of such spaces to demonstrate this.

WRS have no adverse comments to raise in respect of the scoping opinion. The proposed contamination assessment should be undertaken to assess potential risks from contamination and inform requirements for any site investigation and subsequent mitigation measures as necessary. All assessment is required to be undertaken by

competent persons with the relevant qualification and experience and meet the requirements of the <https://www.gov.uk/government/publications/land-contamination-risk-management-lcrm> and other current industry guidance and best practice.

I hope the above is useful to you. Please get in touch with any further queries.

Kind regards,

[REDACTED]

[REDACTED]

Specialist Lead Officer (Contaminated Land)

Tel: [REDACTED]

Wyre Forest House, Finepoint Way, Kidderminster, Worcestershire, DY11 7WF

Fax: [REDACTED]

E-mail: [REDACTED][@worcesterservices.gov.uk](mailto:[REDACTED]@worcesterservices.gov.uk)

Rishabh Rai

From: Wyre Forest Planning Administration <planning.admin@wyreforestdc.gov.uk>
Sent: 20 April 2026 08:44
To: Arrow Valley Solar
Cc: Wyre Forest Planning Administration
Subject: EN0110033 Arrow Valley Solar EIA Notification
Attachments: AV_Letter to stat cons_Scoping & Reg 11 Notification.pdf

Our response on this occasion is: No comment.

Kind regards



From: Arrow Valley Solar <ArrowValleySolar@planninginspectorate.gov.uk>
Sent: 30 March 2026 14:44
Subject: EN0110033 Arrow Valley Solar EIA Notification

This email originated from outside of the organisation

STOP : Were you expecting this email? Does it look genuine?

THINK : Before you **CLICK** on any links or **OPEN** any attachments.

FAO Head of Planning

Dear Sir/Madam

Please see attached correspondence on the proposed Arrow Valley Solar Farm.

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **27 April 2026**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards



Planning
Inspectorate

Rishabh Rai (He/Him)
Associate EIA Advisor
Planning Inspectorate

 [@PINSgov](#)  [Planning Inspectorate](#)  [planninginspectorate.gov.uk](#)

Ensuring **fairness, openness** and **impartiality** across all our services

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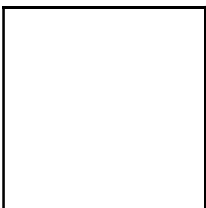
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