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20 May 2026

Applicant Name: Arrow Valley Solar Limited
Proposal: Planning Inspectorate - Consultation on a Scoping Opinion
EN0110033 Arrow Valley Solar EIA Notification
Location: Various Sites Around Wychavon District

Please find below the Council's comments on the above:

Landscape and Visual section (Chapter 12)

Notwithstanding the viewpoints for the LVIA listed at Table 12-1 and plotted on Figure 12.5, it is welcomed, as set out in 12.1.10 that *'This initial study area will be refined where necessary, subject to agreement with the LPA landscape officers and during more intensive Site visits.'* Also, para 12.3.72 that confirms *'The viewpoints and receptors will be subject to change throughout the scoping and LVIA process as the Scheme design develops and following verification of intervisibility on the Site as part of the LVIA.'* The Council welcome that additional viewpoints may be added if the more detailed work identifies the need. It is trusted the same will apply to viewpoints for photomontages.

Para 12.2.2 – reference should now be made to the adopted SWDP Review 2026.

Para 12.2.3 – The Wychavon Design Code is currently out for public consultation.

With reference to Landscape Receptors Scoped In/Out at Table 12-2 and Visual Receptors Scoped In/Out at Table 12-3 - whilst those are generally agreeable it is suggested that, given it is acknowledged that there is intervisibility from all sites with the Cotswolds National Landscape, the Dark Skies as a Visual Receptor should be scoped in and not out as proposed. Table 12-3 states that there is 'minimal' proposed lighting – however, as there will be lighting to some degree (extent not fully clear at this stage) and at least some of the site might be regarded as being within the setting of the NL, then it is suggested that the Cotswolds Conservation Board Position Statement on Dark Skies and Artificial Light is duly taken into account within the LVIA.

Construction/transport routes should also be considered in the LVIA work to identify whether any landscape features may be affected off-site as a result of the proposals – for example, the need for any hedgerow removal to accommodate required highway works (access points, visibility splays, road widening etc) which would affect landscape features and potentially local landscape character (eg character of a rural lane).

Otherwise, it is considered that generally the scope for the LVIA work to be carried out as outlined in Chapter 12 is agreeable.

Whilst this NSIP includes land in Redditch and Stratford District Councils, a large proportion of the sites and the cable route corridors lie within Wychavon District Council, some of them immediately adjacent to ancient semi-natural woodland and close to other sensitive habitats. Given the extent of the project, it is essential that all relevant ecological receptors are fully investigated through appropriate surveys to not only avoid, mitigate and compensate for local impacts but also allow for cumulative and impacts on wider connectivity to be properly assessed.

The approach laid out in the scoping report is generally acceptable and allows for flexibility, should the initial findings highlight the need for further surveys. I would just like to highlight a few specific issues:

- Worcestershire has recently published its Local Nature Recovery Strategy (LNRS) and this has now become policy for Worcestershire. I would therefore ask that the EIA carefully considers the recommendations of the LNRS so that the proposed site and layout choices and mitigation measures can align with the LNRS.

- I note that some ditch and watercourse crossings will be required for cables and access tracks but that *'as far as practicable'* existing crossing points are to be used, or the crossings will be sensitively designed. It will be crucial that the EIA provides as much detail as possible on how this is to be achieved and also provide justification for choosing any new crossings instead of using existing ones and include a detailed analysis of not only local but also downstream impacts.

- Bat surveys:

The bat survey methodology proposed uses 36 pairs of static detectors. Without further detail it is difficult to ascertain if this is likely to be sufficient or not. However, it seems low considering the fact that several of the plots for Site 1 lie immediately adjacent to ancient semi-natural woodland and the need to ensure connectivity across the wider area is maintained.

According to a study published in 2023 by L. Tinsley (et al), bat activity was found to be reduced at solar farms compared to neighbouring sites without solar panels. I would ask that the bat surveys which are to be undertaken provide sufficient baseline information to not only guide the design of the solar farm plots but also to allow for future monitoring. I note that Operational Phase surveys have been scoped out but believe it would be justified to provide monitoring surveys in selected locations during the operational phase based on the research study by L. Tinsley.

- Noise:

No specific detail has been provided on assessing noise impacts on sensitive species such as bats. I would ask that the EIA includes specific analysis of such impacts, not only during construction and decommissioning but also during the operational phase, in particular from installations such as BESS. Bat monitoring surveys during the operational phase should be scoped in to provide valuable information about such noise impacts.

- Breeding birds:

The scoping report 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."* One of the potential issues that may arise is the loss of habitat for ground nesting birds, such as skylark. This species has particular requirements which are not always easy to accommodate within the solar farm. I would therefore ask that careful consideration is given to this species, if found to be nesting in within and immediately adjacent to the solar farm plots, to ensure that suitable compensation is provided which is large enough and not overlooked by predators to provide successful compensatory nesting habitat. This may need to lie outside the solar farm.



Strategic Sites Officer

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