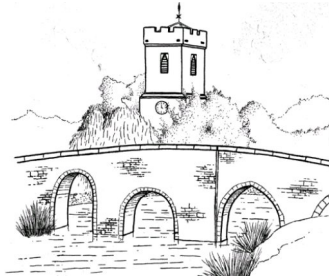


BIDFORD ON AVON PARISH COUNCIL

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 nondesignated 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: Planned system; NDPs form part of the Development Plan.
- Para 92: Healthy, safe, inclusive communities.
- Para 130: Highquality 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 StratfordonAvon 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 deskbased assumptions rather than field surveys.

3.4 Failure to consider community impacts

The Scoping Report treats socioeconomic and human health impacts as negligible, which is not evidencebased.

3.5 Inadequate cumulative assessment

The report does not include:

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

4. Detailed TopicbyTopic 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 nighttime 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, uptodate 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 nighttime 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 designed approach to security (minimising fencing height and visual prominence where possible, using appropriate materials/colour, and limiting lighting through a darksky and ecologically sensitive strategy), consistent with the NPPF and relevant StratfordonAvon 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 longterm 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 StratfordonAvon 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 StratfordonAvon 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 StratfordonAvon DC Core Strategy policies on biodiversity.

River crossings and riveradjacent 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 StratfordonAvon 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. Groundmounted 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 sitespecific geotechnical investigation to inform foundation design and to assess potential construction effects (including noise, vibration and groundborne 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 AngloSaxon 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 deskbased assessment, but should include an appropriate programme of nonintrusive 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, evidenced and capable of informing the Examination.

Missing / inadequate:

- Assessment of nondesignated 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 socioeconomics, 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 standoff 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 onroad 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, sweptpath analysis where relevant, bridge capacity constraints, and pre and postconstruction 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 waterrelated 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 worstcase 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 EN1 (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 EN1, EN3, EN5

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