Land east of Stock Green (adjacent to Roundhill Wood) Wychavon, Worcestershire SEI Review

Prepared for:
Roundhill Wood Solar Farm Opposition Group

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Executive Summary

I. An independent review of the submitted Supplementary Environmental Information which accompanies the full planning application for the Solar Farm on land east of Stock Green has been undertaken which has identified several shortcomings in relation to Cultural Heritage, Ecology and Biodiversity, Archaeology, and Noise and Vibration. The Supplementary Environmental Information also fails to comply with the EIA Regulations 2017 with regards to the Alternative Cable Route Application.

II. A summary of the key findings are noted below:

- The Supplementary Environmental Information does not comply with the Town and Country Planning (Environmental Impact Assessment) 2017 Regulations as it does not include the alternative cable route within the red line boundary;
- The site selection process is not covered in any detail in the design evolution and alternatives section on the ES. This is an important part of understanding the alternatives considered and any potential justification for selection of this greenfield site should be provided;
- Regarding Built Heritage, the Supplementary Environmental Information does not follow best practice guidance as it does not include a robust assessment of significance and does not adequately assess the contribution made by setting to the significance of each asset;
- The Landscape and Visual Impact Assessment has under reported the likely significant effects of the Proposed Development and has set the threshold for 'significance in EIA terms' to high, thereby distorting the overall conclusions;
- The archaeology assessment fails to comply with the Town and Country Planning (Environmental Impact Assessment) 2017 Regulations as it does not provide a clear and accessible description of impacts on archaeological assets;
- The Supplementary Environmental Information does not provide sufficient baseline information to assess the potential impact on bat populations. Without on-site survey data or analysis of foraging and commuting behaviours, claims of minor impacts are unsubstantiated, especially given evidence of negative effects from similar developments on bat species;
- The Biodiversity Net Gain assessment excludes the alternative cable route without justification. Best practice dictates that all components of the Proposed Development should be included within this assessment;
- It is clear from the measurements and evaluations presented in the Noise Assessment that the existing environment is generally undisturbed by noise. The NPPF policies suggest that areas such as these should be protected. Including the Proposed Development at this location is likely to result in the loss of amenity for existing and future residents; and
- Potential night-time noise and vibration impacts, particularly at Church Farm in Dormston, have not been adequately assessed. Given the potential for likely significant effects, an Environmental Statement Chapter should have been provided.

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1. INTRODUCTION

1.1 Trium Environmental Consulting LLP were appointed in April 2025 by Roundhill Wood Solar Farm Opposition Group to carry out an independent review of the Supplementary Environmental Information which accompanies a full planning application (W/23/00270/FUL) for the development of Land East of Stock Green (adjacent to Roundhill Wood), Wychavon, Worcestershire (hereinafter referred to as the Application Site). The Supplementary Environmental Information has been prepared by Pegasus Group on behalf of JBM Solar Projects 11 Ltd (hereafter referred to as 'the Applicant').

1.2 Since the submission of the 2023 Environmental Statement, additional Supplementary Environmental Information (SEI) has been submitted by the Applicant which responds to statutory and public representations. In addition, the SEI provides further information on a separate alternative underground cable route application (Planning Reference: 23/01308/FUL).

1.3 This review considers the documents submitted as part of planning applications W/23/00270/FUL (to Wychavon District Council) and 23/01308/FUL (to Redditch Bourgh Council) for the solar farm development and 23/00192/FUL for the alternative cable route application.

1.4 The Application Site is situated within the administrative area of Wychavon District Council (WDC) and Redditch Borough Council (RBC). The Proposed Development comprises the construction of a Solar Farm and battery energy storage system (BESS) facility together with all associated works, equipment and necessary infrastructure (hereinafter referred to as the 'Proposed Development'). The main solar farm and battery energy storage scheme sits within Wychavon District, however, the underground cable connection routes through the administrative areas of both WDC and RBC.

1.5 The purpose of this review is to provide an independent review of the Supplementary Environmental Information and amended Proposed Development provided by the Applicant. We understand that WDC is the lead authority for the planning application and any direction provided to the Applicant. WDC should also take into account the responses received from statutory consultees and other consultees.

Planning History and EIA Background

1.6 Trium Environmental Consulting LLP was appointed in January 2023 by Farrer & Co, on behalf of local residents, to carry out an independent review of the Environmental Impact Assessment (EIA) and Environmental Statement (ES) which accompanies a full planning application (W/23/00270/FUL) for the development of Land East of Stock Green (adjacent to Roundhill Wood), Wychavon, Worcestershire (hereinafter referred to as the Application Site). The EIA was prepared by Pegasus Group on behalf of JBM Solar Projects 11 Ltd (hereafter referred to as 'the Applicant').

1.7 The purpose of this was to provide an independent review of the 2023 Environmental Statement, Non-Technical Summary and supporting documentation. We understand that since the submission of the 2023 ES, further information has been provided in the form of Supplementary Environmental Information in response to statutory and public consultation responses.

Structure of this Review

1.8 This report comprises the following sections:

- Section 1 - provides an introduction and summary of the review and structure of the report;
- Section 2 – provides a description of the approach to the review;
    - Section 3 - provides a review of the Supplementary Environmental Information and Updated ES Chapters (Introductory Chapters, LVIA, Cultural Heritage, Biodiversity, Concluding Chapters and Non-Technical Summary);
    - Section 4 - provides a review of the updated technical assessments; and
    - Sections 5 and 6 - provides the conclusions of this review and further information Trium and the technical team believe is required to fully understand the effects of the Proposed Development.

2. REVIEW APPROACH TO THE EIA

Approach to ES Review

2.1 This report provides an independent review of the SEI. It provides a review as to whether the ES is compliant with the EIA Regulations, is compliant with the Scoping Opinion provided by the WDC, provides sufficient information on the Proposed Development and Alternatives and whether the ES technical assessments provide sufficient detail to fully understand the potential significant environmental effects associated with the Proposed Development. Where relevant, the review summarises any further information that is required to fully understand the environmental effects and for the ES and SEI to be in full compliance with the EIA Regulations.

2.2 This report has taken into consideration relevant EIA review guidance such as the Institute of Environmental Management and Assessment (IEMA) Review Criteria and the IEMA Guidelines for Environmental Impact Assessment (EIA).

2.3 In addition, the report takes into account current best practice for preparing ES's and is based on the reviewer's technical specialist EIA knowledge and experience with good practice in EIA procedure. Trium's Partners and Employees have extensive experience in managing the environmental issues and impacts surrounding large scale development projects. The Partners and Employees of Trium have, over the course of their careers to date project directed, managed or contributed to over 500 EIAs across numerous sectors.

REVIEW OF COMPLIANCE WITH 2023 ES REVIEW

2.4 As noted above, Trium undertook a review of the 2023 ES and provided a number of comments on the introductory and concluding chapters as well as the Non-Technical Summary. A range of technical specialists reviewed the Landscape and Visual Impact Assessment, Built Heritage ES Chapter, Buried Heritage ES Chapter, Ecology ES Chapter and standalone planning deliverables including Glint and Glare, Noise and Vibration and Water Resources and Flood Risk.

2.5 Within the 2023 ES Review undertaken by Trium, Table 1 provided a summary of Further Information which was required. The updated SEI addresses many of the points, noted below:

- Further information on decommissioning of the Proposed Development, including information on the permanent nature of the Distribution Network Operator (DNO) Station;
- Further information on inter-project and intra-project cumulative effects;
- Inclusion of a climate change assessment within the updated Landscape and Visual Impact Assessment;
- The landscape and visual assessment provides further information on the effects relating to glint and glare;
- Inclusion of elevated views from above Morton Underhill are included within the LVIA;
- A baseline noise survey has been undertaken, and report submitted as further information;
- An analysis of construction traffic along Earls Common Road;
- Initial estimates of impacts that comply with BS 4142;
- A summary of the mitigation measures to be adopted to reduce the noise impacts during the construction and operation of the Proposed Development needs to be provided.

2.6 The SEI does not clearly state the points which have been addressed, and which have not. Having reviewed the documents, Trium believes there are many points which have not been addressed, which are noted below:

- Climate change has not been sufficiently assessed within the Cultural Heritage and Ecology SEI Chapters;

- Bat Surveys have not been undertaken;
- Further explanation is required for the exclusion of Rookery Cottage Meadows SSSI located 2.5km of the northern boundary of the site;
- The 'No Development' scenario should be updated;
- The site selection process is relevant in the context of the use of greenfield land and any significant effects which may occur as a result as of the Proposed Development, this should form part of the Alternatives analysis in the ES (unless of course the site is owned by the Applicant;
- Figures within the Non-Technical Summary to be updated and made readable;
- A clear and comprehensive list or table of the mitigation measures required should be provided;
- A clear description of the levels of less than substantial harm to avoid phrases such as 'at the lower end of the less than substantial harm spectrum'; and
- A description of the significance of the individual assets, rather than grouped together as 'non-designated heritage assets'.

Alternative Cable Route Application

2.7 It is unclear why a separate Environmental Statement has been submitted for the 'Alternative Cable Route' Application. If two routes are proposed, a comparison of effects should be presented throughout the *Alternative Cable Route* Application and the SEI information for the Solar Farm application. No comparison of effects has been provided in either application, therefore it is unclear why two routes are proposed, and which one would have lesser environmental impacts.

2.8 It is noted within the Non-Technical Summary for this application (23/00192/FUL) *"No ES was submitted for the Proposed Development due to the minor nature of the application".* Regardless of how minor the application was, the EIA undertaken for the cable route should have assessed the cable route as, in accordance with the EIA Regulations, is part of the project especially given that the potential for significant effects in relation to Ecology and Biodiversity and Archaeology.

2.9 The planning deliverables associated with the application provide contradicting and inconsistent information regarding the purpose of the alternative cable route, making it difficult to understand why an alternative point of connection is required. The Ecological Impact Assessment notes "*the route of the buried cable is to be changed from its currently predicted course*" whilst the Planning Statement notes "*the purpose of this application is to allow for a minor alteration to the currently proposed cable route … Should both proposals for the solar farm application and the standalone application be granted planning permission, this would result in 2 options for connecting to the substation*".

2.10 The EIA Regulations clearly define that the assessment should comprise everything within the red line plan as this is part of the proposal. As it stands the SEI makes reference to the alternative cable route within SEI Chapter 1: Introduction, noting the EIA Assessment area is inclusive of the red line boundary and the alternative cable route boundary. However, the impacts of the alternative cable route are set out within a separate planning application and the reader is directed to this planning application to understand the impacts of this cable route. This raises two fundamental flaws:

1. The alternative cable route is not holistically assessed as part of the EIA; and
2. Given the alternative cable route is part of the project for which an EIA is needed, the submission documents should have been updated to avoid a paperchase. This is in line with the Case Law ruling Berkeley v Secretary of State for the Environment [2001] 2 AC603 in which the House of Lords emphasised the importance of an EIA and made it clear that if but only if there had been substantial compliance with the requirements of the Directive would a permission be granted in the absence of an EIA. It was not sufficient that the court was persuaded that the outcome was inevitably going to be the same. In Berkeley there was no EIA provided and it was necessary to trail trawl through various documents in order to obtain the information which should have been provided in an EIA.

2.11 The Applicant should provide the following additional information in relation to the alternative cable route:

- A comparison of effects between the original proposed cable route and alternative cable route;

- Clarity on which cable route is the most viable option and could come forward as part of the planning application. Is there a possibility that both could come forward?;
- Why the alternative route has been considered;
- If the alternative route is within the Applicant's land ownership; and
- Updated BNG Report which includes the alternative route within the assessment.

3. REVIEW OF INTRODUCTORY AND CONCLUDING CHAPTERS OF ENVIRONMENTAL STATEMENT AND NON-TECHNICAL SUMMARY

SEI Chapter 1: Introduction

3.1 Trium has reviewed SEI Chapter 1: Introduction prepared by Pegasus Group, for planning application W/23/00270/FUL.

3.2 The chapter sets out the planning history and EIA Background of the site, terminology and the proposed amendments. It further sets out the assessment approach, baseline conditions and provides an assessment of cumulative and in-combination effects.

3.3 **Table 1** below provides Trium's comments on the updated Introduction chapter.

Table 1 Introduction Comments

SEI Reference	SEI Comment	Trium Comment
1.3.9	• The alternative underground cable route application has been considered alone and in-combination with the Proposed Development.	• The ES submitted in 2023 did not consider an alternative cable route as part of the planning application, whereas the SEI considers an alternative cable route which may come forward as part of the Proposed Development. Therefore, the inclusion of this assessment constitutes further information under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and will require re-consultation.
1.4.8	• *"This SEI (2025a) has been provided by the Applicant voluntarily as opposed to a request for Further Information and Evidence under Regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017*	• The 2023 ES has not been updated and although this has been provided voluntarily, the SEI constitutes further information given the inclusion of the assessment of the alternative cable route and 10 additional viewpoints. • Re-consultation will be required.
1.6.1	• Within paragraph 1.6.1 it is noted *"The scope and content of the SEI (2025a) is based on the methodology adopted in the original ES and submitted in February 2023".*	• Since the submission of the 2023 ES, the NPPF has been updated in December 2024. There is no narrative on the updated NPPF and whether or not this will have a material effect on the Proposed Development. If the Proposed Development had been granted planning permission, then the SEI could have been updated without reference to any new planning policies and legislation. As planning permission has not been granted, the SEI should have been undertaken in accordance with revised planning policy and guidance and therefore the impact of changes to planning policy/guidance or legislation requires clarification.
1.9.1	• *"The EIA Assessment Area encompasses the Proposed Development (the alternative cable route section subject of planning application 23/01308/FUL (RBC)) and the Roundhill Solar Farm application (subject of planning application 23/00192/FUL / W/23/00270/FUL (WDC/RBC)). However, the*	• The information presented in relation to the alternative cable route is confusing. It is unclear how the Application site Red Line Boundary has not increased or decreased as a result of the alternative cable route. • The inclusion of the alternative cable route within the Red Line Boundary would result in a larger site,

	Application Site red line boundary has not increased or decreased since the ES (2023) was submitted."	thus impacting on the Biodiversity Net Gain. This point is discussed further in the *Ecology* section of this response. • The planning deliverables associated with the alternative cable route note a different approach. The Ecological Impact Assessment notes "*the route of the buried cable is to be changed from its currently predicted course"* whilst the Planning Statement notes *"the purpose of this application is to allow for a minor alteration to the currently proposed cable route … Should both proposals for the solar farm application and the standalone application be granted planning permission, this would result in 2 options for connecting to the substation*". *".* • The Applicant should clarify if both options are viable, and which cable route is the preferred route, should permission be granted.
1.10.10 – 1.10.18	• This section of the SEI Chapter 1: Introduction provides further information on Sustainability and Project Resilience and Sustainability.	• The Landscape and Visual Assessment provides further information on the implications of climate change, which has been updated since the 2023 ES. However, it is not clear what guidance, and methodology have been utilised to inform the assessment. • The Cultural Heritage and Biodiversity 2023 ES Chapters and 2025 SEI Chapters do not provide any updated assessments on climate change, which is not in accordance with the Scoping Opinion which requests climate change scenarios, detail regarding the implications of the assessments or the residual effects. • The EIA Regulations 2017 (as amended) require that an EIA provides: "*A description of the likely significant effects of the development on the environment resulting from, inter alia…* *(f) the impact of the project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change".* This has not been provided as part of the 2023 ES or 2025 SEI update.
1.10.18	• *Details of the mitigation measures are found in Table 3.3-3.5 of the Sustainability and Climate Resilience Strategy*	• Whilst the EIA Regulations do not explicitly state that mitigation should be clearly presented, IEMA Guidance "Environmental Impact Assessment Guide to Delivering Quality Development (2016)" states that *"the list of key mitigation commitments can be itemised, enabling their ongoing tracking into conditions, management plans or detailed design."* • Mitigation measures are cross-referenced throughout the ES, but there is no comprehensive list of the key mitigation measures. • A clear and comprehensive list or table of the mitigation measures required should be provided.
1.10.19	• A 40-year operational life span is noted. At the end of this lifespan, the site would be restored back to agricultural use. The Distribution Network Operator (DNO) substation and ancillary security measures will be retained.	• There is no narrative provided on whether the Proposed Development is classed as temporary or permanent. The Applicant should justify their position on this.
1.11.2	• *"The design changes between the two layouts are listed at paragraph 1.4.5 of this Introduction Chapter."*	• The design changes associated with the scheme are not considered to be alternative designs. • Whilst the "additional elements" introduced into the scheme are welcomed and beneficial from an ecological perspective, it should be recognised

		that these are enhancements to the scheme, not alternative designs. .

Non-Technical Summary

3.4 Trium have reviewed the Non-Technical Summary (NTS) which has been prepared by the Pegasus Group. The aim of the Non-Technical Summary is to provide a concise summary of the ES written in non-technical language. It should present a summary of the Proposed Development, alternatives considered, the likely effects and the identified residual likely significant environmental effects, and any required mitigation measures.

3.5 **Table 2** below provides Trium's comments on the updated Non-Technical Summary.

Table 2 Non-Technical Summary Comments

NTS Reference	SEI Comment	Trium Comment
INTRODUCTION		
Page 2	• *"This SEI (hereafter referred to as the "SEI (2025a) …"*	• The purpose of the Non-Technical Summary is to provide a summary of the ES in non-technical language. • There is no narrative provided on what the 'SEI' is or how it differs from the Non-Technical Summary submitted with the 2023 Environmental Statement. It is unclear if the reader should read the 2025 SEI Non-technical Summary in conjunction with the 2023 NTS, or if this is a replacement document.
Page 3, Figure 1	• Location of Application site	• The alternative cable route is not shown on this figure and is inconsistent with the information presented in the SEI Main Report. Clarification is required as to the redline and scope of assessment.
Page 7, Figure 3	• Site Layout and Landscape Mitigation Plan	• This figure is unreadable. This defeats the purpose of an NTS.
APPLICATION SITE / EIA ASSESSMENT AREA AND CONTEXT		
Page 12 and Page 13, Figure 4	• *The inclusion of the Alternative Underground Cable Route section in the EIA Assessment Area allows for optionality for the final section of underground cable route connecting to National Grid Feckenham. Only one cable route option will be implemented. However, the Application Site red line boundary has not increased or decreased since the ES (2023) was submitted.*	• It is unclear how the Application site Red Line Boundary has not increased or decreased as a result of the alternative cable route. • There is no information provided on the alternative cable route – i.e. why it has been chosen and if it is located within the Applicant's land ownership. • Further clarification is required from the Applicant to understand if both cable routes are viable options. • Whilst an application has been submitted for the alternative cable route and the Proposed Development, no comparison of effects has been provided and there is no understanding of the impact from both the Proposed Development and the cable route.
LANDSCAPE AND VISUAL		
Page 18	• *The EIA Assessment Area would however retain existing landscape pattern, scale, structure and characteristic features, and importantly, it is fully reversible (apart from the DNO substation) and so would not adversely affect the landscape character of the local landscape in perpetuity.*	• The DNO substation has not been assessed as being permanent. An assessment of the DNO substation on the wider landscape once the solar farm has been decommissioned should be provided. • There is no assessment of the infrastructure associated with the solar farm. The visual assessment focusses on the solar PVs and does

		not include an assessment of the substation, CCTV poles or inverters.
Page 19	• *Mitigation measures outlined at Figure 1.3a: Proposed Site Layout and Landscape Strategy including new native hedgerow planting and infill would be implemented resulting in Major to Moderate Beneficial (significant) effects by Year 15.*	• The effects noted within the construction stage assessment are misleading as a Major to Moderate Beneficial effect is anticipated by Year 15. This should be updated to provide an accurate effect of the construction stage. • The Year One scenario should be assessed accurately, and the significance of effects should be presented.
Page 18 - 21	• During the construction and operational phases, there is an inconsistency around Moderate effects – 'Moderate Adverse' effects are noted as 'Not Significant' but 'Moderate Beneficial' effects are noted as 'Significant'. • Examples of this include: • *"For receptors at Viewpoint 23, during the construction phase Moderate adverse (not significant) temporary effects…";* • *"For the residents of Leasowes (Viewpoint 4) the construction activity would be partially screened from view by vegetation within the curtilage of the property resulting in a Low magnitude of Change and Moderate (not significant) effects".;* • *"Moderate (significant) effects are identified upon the Site itself reducing to Minor (not significant) by Year 15."; and* • *For the residents of Leasowes (Viewpoint 4) the EIA Assessment Area at year 1 would result in Moderate (significant) effects.*	• The reporting is inconsistent and subjective, and the methodology used to catergorise Moderate effects as 'Not Significant is not known. • The Applicant should provide an updated assessment which follows best practice guidance and methodology.
Page 20	• *For the residents of Leasowes (Viewpoint 4) the EIA Assessment Area at year 1 would result in Moderate (significant) effects, reducing to Negligible during the summer months and by year 15.*	• This assessment should include winter views by Year 15 as a worst-case scenario. By only assessing the summer months of Year 15, the conclusions made are misleading. • The Year One scenario should be assessed accurately, and the significance of effects should be presented.
Page 21	• *The DNO substation would remain following decommissioning leading to a very localised permanent but not significant effects.*	• A summary of this assessment should be provided in the non-technical summary as it is not clear how the conclusions have been reached.
Page 22	• The conclusion of the LVIA section of the NTS states that the solar farm could successfully be accommodated within the site with only limited significant effects, which are noted to be temporary in nature.	• It is unclear why they are noting a development which has a 40-year lifespan as a 'temporary' development. Whilst it is recognised that a 40-year lifespan is not permanent, the solar farm will be seen for a large portion of the receptors lifetime. The Applicant should justify how they have come to this conclusion. • There are a number of moderate and major adverse effects, so it is unclear how they can conclude the Proposed Development would be 'successfully accommodated' in the landscape. The Applicant should clarify this conclusion.
BIODIVERSITY		
Page 26	• Within the construction stage assessment it is noted: *Aside from the above, the text within the ES (2023) remains accurate in this SEI (2025a). Please refer to the ES (2023) and 'Section 8 Biodiversity' of the NTS (2023) for this information.* • With regards to the operational stage, it is noted: *Aside from the above, the text within the ES (2023) remains accurate in this SEI (2025a). Please refer*	• The NTS should provide a summary of the assessment to understand how the conclusion is reached. • The 2023 NTS notes *"There could be indirect effects on roosting, commuting and foraging bats that could be significant without mitigation. The cable route could affect otter / water vole on the*

	to the ES (2023) and 'Section 8 Biodiversity' of the NTS (2023) for this information.	*Brandon Brook that could be significant without primary mitigation measures."* • Therefore, it is unclear from the text provided in both the 2023 NTS and 2025 SEI NTS how the conclusion of *no significant adverse effects* has been reached.
Heritage		
Page 25	• *"Further cultural heritage setting information is provided or the Grade II Listed Building: The Leasowes, Grade II Listed Building: Dormston Manor, Grade I Listed Building: Church of St Nicholas and Non-designated heritage asset: Stockwood Lodge Farmhouse".*	• Within the section for heritage, the information presented for above ground assets is minimal. From this NTS, it is unclear if there will be any significant impacts to above ground heritage assets.
SUMMARY		
Page 28	• *"It is therefore considered that there are no negative residual significant effects that are overriding which would preclude the Proposals in the EIA Assessment Area."*	• Significant effects have been identified for the construction phase, operational phase and decommissioning phase in relation to the Landscape and Visual Impact Assessment. Major Adverse effects are anticipated in relation to residential receptors and Public Right of Way users during construction and Year One of operation. The NTS is biased and appears to be promoting the planning application. The NTS should be updated to provide objective conclusions of the Proposed Development. • Whilst no significant residual effects are reported in relation to biodiversity, these conclusions are not understood given the baseline for biodiversity and bat presence is unknown. • The summary provided on Page 28 of the NTS is inaccurate and misleading, and appears biased towards the Proposed Development.

Mitigation and Monitoring

3.6 Mitigation is not clearly discussed and understood throughout the ES. An essential requirement under the EIA Regulations is to identify and clearly present the mitigation required and implemented to reduce adverse effects. Mitigation measures are referenced intermittently throughout the ES, but there is not a drawing together of key mitigation measures in ES Chapter 5 Summary. A clear and comprehensive list or table of the mitigation measures required should be provided.

Residual Effects

3.7 SEI Chapter 5: Summary provides a summary of the SEI. However, the purpose of this chapter is unclear. It largely repeats information included in SEI Chapter 1 Introduction and provides a similar function as the NTS. This SEI should provide a clear and concise summary of all environmental effects (beneficial and adverse) associated with the Proposed Development. A table would be a useful way to display the information.

3.8 **Table 3** below provides Trium's comments on SEI Chapter 5: Summary

Table 3 SEI Chapter 5: Summary Comments

SEI Reference	SEI Comment	Trium Comment
5.1.1 – 5.6.7	• The information presented within Paragraphs 5.1.1 – 5.6.7 is repetition of the introduction chapter and includes information on the Proposed Development, SEI availability and comments and the SEI Scope and Methodology.	• There is no requirement for this information to be repeated in the summary chapter of the SEI as it repeats the information provided in SEI Chapter 1: Introduction.

LANDSCAPE AND VISUAL		
5.6.10	• *"It is concluded that the EIA Assessment Area would not significantly harm the existing positive landscape elements associated with the Site. The existing landform of the Site would remain largely unchanged during the construction, operational and decommissioning period".*	• The assessment of likely significant effects notes major adverse (significant) visual effects during the construction stage of the Proposed Development for a number of residential dwellings and users of the Public Right of Way. • The Operational Phase effects notes significant effects within Year 1 from residential receptors and Public Right of Way users. • The information presented within the summary contradicts the statement "*The existing landform of the Site would remain largely unchanged during the construction, operational and decommissioning period"* given there are Major Adverse (significant) effects anticipated during the operational stage (Year One).
Operational Phase	• This text notes the operational phase impacts of the Proposed Development.	• It is not clear from the assessment whether the associated infrastructure is included within this assessment. This assessment appears to focus on the PV panels, not the development as a whole [i.e. substation, access tracks, CCTV poles and inverter houses]. The Applicant should clarify if the associated infrastructure is included within the assessment.
5.5.29	• It is noted within the conclusions that the Proposed Development would have *"very limited significant temporary but long-term residual effects"*	• It is unclear what is meant by "*temporary but long-term residual effects".* The Applicant should clarify their position on this.
CULTURAL HERITAGE		
5.6.6 – 5.5.7.	• The assessment of likely significant effects and mitigation and enhancement sections only provide information on the below ground heritage assets. There is no narrative on the above ground heritage assets.	• Given no detail has been provided on above ground heritage assets, it is unclear how the conclusion of "*no significant residual effects in respect of cultural heritage assets (above and below ground)"* has been reached.
BIODIVERSITY		
5.8.9	• For operation effects, the summary notes "*the text within the ES (2023) remains accurate in this SEI (2025a). Please refer to this ES (2023) for this information.*	• The conclusions within the 2023 note there could be "*indirect effects on roosting, commuting and foraging bats that could be significant without mitigation. The cable route could affect otter / water vole on the Brandon Brook that could be significant without mitigation*". It further notes there will be no significant residual effects with mitigation in place. However, given that no bat surveys have been undertaken to understand the species present on site, Trium disagrees with this conclusion.
CONCLUSIONS		
5.9.1	• *"In conclusion, this SEI (2025a) provides an update to the ES (2023), updating the Landscape and Visual, Cultural Heritage and Biodiversity chapters. Overall, this SEI (2025a) demonstrates that there are no overriding environmental constraints which would preclude the Proposed Development".*	• Significant effects have been identified for the construction phase, operational phase and decommissioning phase in relation to the Landscape and Visual Impact Assessment. Major Adverse effects are anticipated in relation to residential receptors and Public Right of Way users during construction and Year One of operation. • Whilst no significant residual effects are reported in relation to biodiversity, these conclusions are not understood given the baseline for biodiversity and bat presence is unknown. • This conclusion is inaccurate given the visual and ecological constraints.

ENVIRONMENTAL TOPICS SCOPED INTO THE EIA

Landscape and Visual

3.9 A review of the Landscape and Visual Impact Assessment SEI Chapter and supporting information has been undertaken by Charles Potterton of Potterton Associates Ltd. The review by Potterton Associates Ltd consists of an independent peer review of the LVIA (within the ES) and an independent review of the landscape and visual context of the site. The review concludes that the LVIA has under reported the likely significant effects of the Proposed Development and has set the threshold for 'significance in EIA terms' to high, thereby distorting the overall conclusions.

3.10 **Table 4** provides a summary of the ALLP comments on of SEI Chapter 2: Landscape and Visual Impact. In addition to the summary below, Potterton Associates Ltd have prepared separate documentation with regards to the landscape and visual effects tables presented in the SEI. This should be read in conjunction with this document.

Table 4 SEI Chapter 2: Landscape and Visual Impact Comments

SEI Reference	SEI Comment	Charles Potterton Comment
2.2.19	• *"Within Table 2.9, the major effects highlighted in dark gray are considered to be significant in terms of the EIA Regulations".*	• Table 2.9 only includes the category of 'major' significance as being significant in EIA terms. This is incorrect as 'moderate' effects are also considered significant in EIA terms. It is unclear why 'moderate' effects have not been included as 'significant' and no justification or explanation has been presented. • Further justification on why 'moderate' effects are not classed as significant should be provided.
2.3.58 – 2.3.62	• *"…the susceptibility of the local landscape to this type of development is assessed as low".*	• Potterton Associates Ltd fundamentally disagrees with this assessment. Landscape susceptibility is a measure of whether the site can accommodate the proposed scheme without undue consequences for the maintenance of the baseline situation. • Given the nature of the site is openly visible from a number of locations and includes varying topography, alongside there being no other solar farms in the locality, justification is required as to why the assessment of susceptibility is given as 'low'. • Using the methodology presented in Table 2.3 of the LVIA, Potterton Associated Ltd have concluded the susceptibilty of the site should be classed as 'high' due to the following: – The scale of enclosure – landscapes with a low capacity to accommodate the type of development being proposed owing to the interactions of topography, vegetation cover, built form, etc.; – Nature of land use – landscapes with no or little existing reference or context to the type of development being proposed; – Nature of existing elements – landscapes with components that are not easily replaced or substituted (e.g. ancient woodland, mature trees, historic parkland, etc); and – Nature of existing features – landscapes where detracting features, major infrastructure or industry is not present or where present has a limited influence on landscape character.

		• The Applicant should update the LVIA to provide an objective assessment of the Proposed Development.
2.3.62	• *"Solar farms and their associated infrastructure and cables are characterised by their light footprint and low profile, with the panels following and reflecting the underlying topography, and limited earth works. On that basis, the susceptibility of the local landscape to this type of development is assessed as low"*	• The solar panels are approximately 3m tall, with their associated infrastructure (CCTV, poles etc.) being much taller. These are exclusively man-made elements that are industrial in appearance. • It is unclear how the Applicant has concluded the Proposed Development will have a 'light footprint' given the overall site area is 119.7 hectares. The Applicant should provide justification for this.
2.3.106	• *"Whilst Viewpoint 9 is recorded from the Earls Common Road, it is not considered to be entirely representative of a typical view experienced by road users".*	• If not representative of the view from Earls Common Road, it is unclear why this viewpoint has been included within the assessment. • Updated photography should be taken, and an assessment provided for a typical view experienced by road users.
Appendix 2.1a Landscape Effects Table		• Potterton Associates Ltd have undertaken their own review of the Landscape Effects Table which has been submitted separately. • Overall, the conclusions of this document note the assessment provided is incorrect and misleading. The change to the character of the site (in totality) is 100% and of major significance at year 1 and at year 15 (even with mitigation due to the overwhelming scale of the scheme).
2.4.20 – onwards	• Operational Effects	• A number of inconsistencies are reported throughout the assessment, with Moderate Adverse (Not Significant) effects being noted for viewpoint 12 and Moderate Adverse (Significant) effects being noted for viewpoint 4. The Applicant should clarify if Moderate Adverse effects are considered significant or not significant. • The visual amenity does not consider the ancillary uses associated with the Proposed Development (i.e. inverters, CCTV, DNO Station). The Applicant should update the assessment to include an assessment of the Proposed Development as a whole, not just the solar array.
2.7.8	• *"Overall, it is considered that the effects on views and landscape character arising from the EIA Assessment Area may be locally significant during the lifetime of the scheme".*	• 'Locally significant' is a key phrase and seems to suggest effects are limited. There is a blurring of the use of the word and no admission as to whether it is beneficial or adverse.
2.7.10	• *"It is concluded that the EIA Assessment Area would not significantly harm the existing positive landscape elements associated with the Site. The existing landform of the Site would remain largely unchanged during the construction, operational and decommissioning period".*	• Potterton Associates Ltd disagrees with the statement made within the summary. The solar arrays and associated infrastructure would alter the current landscape, by introducing industrial elements in an otherwise open landscape. • The assessment appears to under-report the likely significant effects, and at times promotes the scheme. The Applicant should provide an objective assessment.
2.7.22	• *For the residents of Leasowes (Viewpoint 4) the construction activity would be partially screened from view by vegetation within the curtilage of the property resulting in a Low magnitude of Change and Moderate (not significant) effects.*	• There are extensive and wide-open views from Leasowes across a significant part of the site. This assessment is incorrect and should be updated.
2.7.40	• *"On balance, it is concluded that the EIA Assessment Area could be successfully accommodated within the Site and surrounding landscape with only very limited significant temporary but long- term residual effects on landscape character or visual amenity as a whole".*	• The conclusions noted within the SEI are not 'very limited significant effects'. There are a wide range of moderate and major effects noted from construction through to decommissioning. The Proposed Development could not be successfully

		accommodated within the site and surrounding landscape due to the number of PROW's, road users and residential receptors. • The life cycle of the scheme is considerable and, in all reality is generational and not really temporary. The effects identified would persist throughout the lifetime of the Proposed Development (40 years).

Cultural Heritage

Built Heritage

3.11 A review of the updated Built Heritage Assessment has been prepared by Paul Crisp at Smith Jenkins Planning and Heritage Ltd. Paul has 24 years' experience of advising on planning matters with the last 21 years specialising on development which affects heritage assets. A separate detailed response has been prepared by Smith Jenkins, which should be read in conjunction with this response.

3.12 **Table 5** provides Smith Jenkins Planning and Heritage Ltd comments on SEI Chapter 3: Cultural Heritage, focussing on above ground assets.

Table 5 SEI Chapter 3: Cultural Heritage Comments

SEI Reference	SEI Comment	Smith Jenkins Planning and Heritage Comment
Scope of Assessment		
3.2.5	• *"Following the submission of the ES (2023), formal consultation responses were received from WDC and RBC in relation to Cultural Heritage (both Conservation and Archaeology). The responses from the Wychavon District Council Conservation Officer (11.06.23), Trium ES Review, April 2023 (19.04.23), and the Wychavon District Council Archaeology and Planning Advisor (21.08.23) have been considered when undertaking this SEI (2025a)".*	• Comments from the WDC Conservation officer stated "*18 non-designated heritage assets (hereinafter referred to as 'NDHA') will also be affected through change within their setting. Again, these were unnamed*", only six NDHA have been assessed. • The Applicant should provide justification as to why only six of the 18 NDHA have been assessed.
Assessment of Effects		
		• No assessment of construction effects or decommissioning effects on heritage assets has been included within the SEI Chapter. This should be provided to understand the effects of each stage of the Proposed Development. • Each heritage asset should have a scale and nature of effect assigned.
3.3.29 – 3.3.30	• Regarding Dormston Manor, paragraphs 3.3.29 – 3.3.30 note the previous conclusions within the 2023 ES remain unchanged, and the Proposed Development will result in no harm to their significance.	• The Zone of Theoretical Visibility (ZTV) mapping indicates there would be visibility between the Proposed Development and Dormston Manor. The Proposed Development would be visible on the approach to the buildings and across fields, changing the rural setting. • Therefore, the conclusions of 'no harm' is incorrect. The Applicant should update their assessment accordingly.
3.3.31 – 3.3.33	• The assessment of the Church of St Nicholas (Grade I Listed) concludes the Proposed Development will result in no harm to its significance.	• The assessment only considers this asset in summer, when vegetation would screen the Proposed Development. • A worst-case scenario should be included (i.e. winter) to assess the Proposed Development without screening from vegetation.
3.3.37	• The assessment of Stockwood Lodge Farmhouse (NDHA) concludes no harm to the significance with embedded mitigation.	• The SEI should provide further information on the effect upon this NDHA before mitigation. • The Proposed Development borders the site and would be highly visible. The mitigation proposed of

		a community orchard would further change the rural setting of the asset. • There would be harm to the asset which should be considered in further detail.
Table 3.4	• Table 3.4 provides a summary of effects, mitigation and residual effect for the construction, operation and decommissioning stages of the Proposed Development. • Minor Adverse residual effects are noted in relation to Grade II Listed Building 'The Leasowes'.	• There is no methodology for identifying how the significance of effects has been arrived at. Table 3.4 notes that the proposals will have minor adverse effect on the Grade II listed 'Leasowes', but there is no supporting methodology to arrive at this conclusion. • A series of tables which set out how the value of a heritage asset has been determined as well as how the magnitude of effect has been arrived at should be included, in line with GLVIA guidance. • Dormston Manor (Grade II Listed), Church of St Nicholas (Grade I) and Stockwood Farm Lodge (NDHA) are not included within Table 3.4. This table should be updated to include this information.
3.3.29 – 3.3.37	• Paragraphs 3.3.29 – 3.3.37 provides an assessment on various heritage assets including The Leasowes, Dormston Manor, Church of St Nicholas and Stockwood Farm Lodge.	• When assessing the effects on the heritage assets, consideration is only given to the solar arrays themselves. There appears to have been no consideration to the potential effects of the boundary treatments and other elements (CCTV, inverters etc) which will be a noticeable change to the open character of the landscape. • The assessment should include an assessment of all aspects of the Proposed Development including DNO Station, CCTV poles and inverters.
		• The Pool House (Grade II) and The Shieling (Grade II) are within the study area but have not been subject to the Scoping Process. • There has been no consideration of the Proposed Development on these assets. Further information should be provided on why no assessment has been carried out, despite being within the study area.
Mitigation, Enhancement and Residual Effects		
3.4.1 – 3.4.3	• The Cultural Heritage chapter provides mitigation which includes the landscape strategy and excluding solar arrays and cabling from the north-west quadrant.	• The mitigation outlined is over-reliant on newly planted trees and hedges which will take a number of years to mature and there will be an intervening period when there will be open views of the solar farm and battery energy storage scheme. The assessment should reflect this, and a consistent approach should be used to assess impacts (i.e. using a Year One and Year 15 scenario, as noted in the Landscape and Visual Impact Assessment).

Buried Heritage

Introduction

3.13 The Cultural Heritage SEI Chapter has been prepared by the Pegasus Group and provides an update of the cultural heritage baseline and assessment of effects presented within the 2023 ES. The SEI and appendices have been reviewed by MOLA. MoLA is one of the largest archaeological and built heritage practices in the UK, with over 40 years' experience of providing independent, expert, and objective heritage guidance, research and fieldwork services

3.14 **Table 6** provides MOLA's comments on SEI Chapter 3: Cultural Heritage and the technical appendices.

Table 6 SEI Chapter 3: Cultural Heritage Comments

SEI Reference	SEI Comment	MOLA Comment
Technical Appendices		
Heritage Addendum paragraph 1.13	• *"The Late Iron Age and Roman archaeological resource of the site is not of Schedulable quality; rather, the remains are considered to be non-designated heritage assets of local to regional heritage significance".*	• The Heritage Statement provides no detailed discussion of significance. Given there is no discussion of significance, it is unclear how the conclusion of 'not schedulable quality' has been reached. • The Applicant should provide clarification on the significance and conclusions.
SEI - Methodology		
3.2.12 – 3.2.14	• Paragraphs 3.2.12 – 3.2.14 provide a summary of planning policy and legislation, specifically noting harm to the significance of a heritage asset.	• No attempt has been made to address the main comment in the previous review, which relates to the use of 'harm' and the restriction to only three categories of 'heritage significance'. • The reader is left entirely in the hands of the author without fully being able to follow the steps that lead them through the assessment stages. The conclusion regarding significance of environmental effect seems to rest instead on the scale of impact (partial or total removal of archaeological remains). There is also a greater chance of over-or-under reporting an effect; the resulting description of the residual effects is similarly unclear. The methodology does not clearly show how asset significance has been assessed, nor how it would be changed by the impacts of the Proposed Development. The methodology does not clearly show how significant adverse effects would be mitigated or offset by preservation in situ or excavation or recording.
SEI – Significance of Cultural Heritage Resource of the EIA Assessment Area		
3.3.9	• *"Within the original cable route of the Application Site, the gully and ditch recorded in Trench 2 are considered non-designated heritage assets of very limited significance".*	• The assets have been described as being of *'very limited significance'* however, it is unclear how the author has concluded this as there is no discussion of this setting within the 2023 ES or the 2025 SEI.
SEI - Assessment of Likely Significant Effects		
3.3.13	• *"The areas of greatest archaeological sensitivity within the Application Site comprise clusters of features pertaining to Late Iron Age and Roman settlement and agricultural activity, as identified by geophysical survey and trial trenching; these archaeological remains are considered to represent non-designated heritage assets of up to county level significance".*	• The author has identified changes to the scheme and the SEI Chapter notes this. However, the subsequent discussion blurs any possible distinction in significance between different assets, describing all in paragraph 3.3.13 as *'non-designated assets of up to county level'*. Yet, structural evidence would have a greater significance than simple plough marks and thus the significance of effect would be different.
3.3.18 – 3.3.20	• Paragraphs 3.3.18 – 3.3.20 provide the archaeological effects of the north-west quadrant, north-east quadrant and cable route. Noting the following: – North-west Quadrant: Excavations for the construction and removal of the visitor car park and access track could wholly destroy discrete archaeological features like pits, which could be considered **significant** in EIA terms, but would only partially destroy the larger Roman enclosure ditches and droveways, which would be considered **not significant** in EIA terms.	• The description of impacts is inconsistent. As a result, it is unclear how the conclusions in paragraphs 3.3.18 – 3.3.20 have been reached. • Describing the significance of each type of asset, the magnitude of impact and thus resulting the scale of effect would help the reader understand the conclusion.

	– North-east quadrant: If archaeological features were wholly destroyed, this could be considered **significant** in EIA terms. – Cable Route: The gully and ditch recorded within the cable route by the trial trenching could be partly destroyed by the excavation of the cable trench, but acknowledging the very limited significance of these non-designated heritage assets, this effect would be considered **not significant** in EIA terms.	
3.3.33	• *"The EIA Assessment Area makes no contribution through setting to the significance of the Church, and so the Proposed Development will result in no harm to its significance".*	• The author of the SEI has used incorrect language when reporting effects. Significance is never 'Harmed', it may be reduced or increased but never Harmed. Thus, the report should state '*and so the Proposed Development will result in no change to its significance'*.
SEI - Mitigation		
3.4.2 – 3.4.4	• The Mitigation by Design section of the SEI notes the development layout and landscape strategy has been amended to exclude solar arrays and cabling from the north-west quadrant of the application site (within which there are 12 archaeologically sensitive areas). It further states some development infrastructure is proposed in the north-west quadrant, and there are some unavoidable conflicts.	• The changes in the Proposed Development to avoid areas of potentially significant archaeology are noted. However, the discussion is confusing as they have noted mitigation which could impact upon archaeological assets – this would mean the archaeological effects would remain significant and the proposed mitigation would be ineffective. • It is unclear why they have concluded the proposed mitigation would result in no harm to the significance of a non-designated heritage asset. The Applicant should clarify their position on this.
SEI – Residual Effects		
3.4.10	• Paragraph 3.4.10 provides the residual effects on archaeology as a result of the Proposed Development.	• The residual effects have been described in terms of Harm and thus given that all the archaeological assets have been described as 'non-designated' are reduced to 'shades' of one level of Harm, i.e. 'Harm to Non-designated Heritage Assets'. Nowhere has there been any description of how this Harm varies in this category. • It is unclear why the residual effects are noted as having 'No Harm' or 'Minor Harm' on assets when it is stated the mitigation proposed could potentially impact the asset. This would mean the archaeological effects would remain significant and the proposed mitigation would be ineffective • MOLA considers that this lack of clarity has led to the possibility that the level of residual effect has been underreported. The grouping together under one level of 'significance', hides any slight differences in level of significance that may exist between assets. • An assessment of each type of asset should be provided to provide clarification.

Biodiversity and Ecology

Introduction

3.15 A review of SEI Chapter 4: Biodiversity and supporting information has been carried out by Trium Environmental Consulting LLP. A review of the Biodiversity and Ecology Assessment and supporting information has been carried out by Tom Hall MEnvSci CEnv MCIEEM, Head of Ecology at Trium Environmental Consulting LLP. Tom has over 19 years experience in ecological consultancy, working

on a wide variety of project types across the UK, and holds full Membership of the Chartered Institute of Ecology and Environmental Management and is a Chartered Environmentalist.

3.16 **Table 7** provides Trium's comments on SEI Chapter 4: Biodiversity.

Table 7 SEI Chapter 4: Biodiversity Comments

SEI Reference	SEI Comment	Trium Comment
Methodology		
4.2.1	• *"The text within the Environmental Statement (ES) (2023) remains accurate in this SEI (2025a). Therefore, there is no need to update this section. Please refer to the ES (2023) for this information".*	• The assessment remains based on version 1.1 of the best practice guidelines for Ecological Impact Assessment. • The SEI Chapter should be updated to include the latest best practice guidelines for Ecological Impact Assessment (EcIA) (version 1.3) issued by the Chartered Institute of Ecology and Environmental Management (CIEEM) in September 2024.
Designated Sites – Hydrological Connectivity		
Table 4.1	• "*as a buried service and backfilled with permeable material – either excavated material or sand, […] therefore, water would still flow either over ground or through the sub-surface to or from the SSSI as per the existing situation, minimising potential impacts on the SSSI hydrological regime*".	• The detail regarding backfilling is important, as any changes to the permeability could influence the condition of the SSSI and priority habitat through which the pipeline traverses, as highlighted by Natural England. The response identifies the potential to use sand as backfill material, as this material is likely to have a higher permeability than the existing soil. It has potential to intercept shallow groundwater movement and redirect it along the trench as the path of less resistance. Given the close proximity of the cable to the SSSI and extent across the eastern side, the influence of this could affect the SSSI condition that requires further assessment to reach the conclusions provided. • Further justification that the pipeline will not impact upon the Wylde Moor, Feckenham Site of Special Scientific Interest (SSSI) is required.
Designated Sites - Dust		
4.4.1	• *"Air pollution and dust impacts to Stock Wood Meadows SSSI during the construction phase are not considered to generate a significant impact upon the SSSI. Best practice dust suppression practices will be employed during the construction phase, which would reduce dust dispersion, and prevent dispersal off-site, and would therefore not impact upon any off-site designations, such as Stock Wood Meadows SSSI which is 30m east of the solar site boundary, and no significant effects*".	• The SEI provides limited additional information regarding the potential for impact from dust generation, with no assessment made to determine the potential magnitude of impact or risk to the SSSIs. • The SEI does not specify the measures that would be proposed or how these would be identified, and as a result it cannot be concluded with certainty that appropriate measures will be adopted to avoid impacts. • The potential for impact from dust generation and mitigation measures for both Stock Wood Meadows SSSI and Wylde Moor, Feckenham SSSI should be outlined in further detail.
Bats		
4.3.4	• The SEI confirms information presented in the ES, with additional information relating to the alternative cable route, that "*there are a total of 20 trees within the solar site which are assessed as having either moderate or high potential to support roosting bats and there are many more present within Roundhill Wood although these were not surveyed individually due to being located outside of the EIA assessment*	• The concerns previously raised regarding the absence of targeted survey information for bats has not been addressed, with no further surveys carried out to provide baseline information or adequate justification set out in the SEI as to why surveys would not be required.

	area boundary. There is one high potential tree located directly on the original cable route. The alternate cable route has two moderate potential trees and three high potential trees".	
	• The SEI confirms that disturbance impacts will occur but does not provide a justification as to why targeted surveys to provide greater certainty on impacts are not warranted. Whilst the surveys were originally completed with the previous best practice guidelines, referenced in the ES, these still recommend further survey where '*the preliminary roost assessment has not ruled out the reasonable likelihood of a roost being present, but no definitive evidence of the presence of bat roost has been recorded*'.	• The latest best practice guidelines make recommendations for survey effort for bats based on the level of habitat suitability. For potential roosting habitat further surveys are required to provide confidence of a negative result with emergence surveys potentially required where "structures or trees will be directly (through demolition, modification, pruning, felling) or indirectly (through lighting, noise or vibration disturbance or changes to surrounding habitats) impacted by development proposals. • Targeted bat surveys should be undertaken to understand the baseline.
4.5.2 and 4.5.4	• The SEI provides information on noise disturbance, noting "*the solar inverters would only operate at maximum noise levels during the peak daytime periods and typically when temperatures are in excess of 30 degrees. At other times of the day, the cooling fans would operate at lower speeds or not at all*". • *"Whilst acknowledging that the evidence is limited, current evidence indicates that noise avoidance behaviour occurs at 60 dB and above. The equipment associated with the Development in the EIA Assessment Area will be kept below this level where it is present in close proximity to bat foraging and commuting habitat."*	• In the absence of baseline activity surveys, it is unclear how it can be concluded that equipment within the development site will be kept below 60 dB where it is present in close proximity to bat foraging and commuting habitat. • The noise assessment identifies the locations of significant equipment in respect to noise generation, which are located along field boundaries with 7 locations along the hedgerow to the south of Roundhill Wood, one associated with a hedgerow to the north and one alongside the northern boundary of Roundhill Wood. One is also in close proximity to the trees with moderate and high roosting potential at the eastern end of Roundhill Wood. The noise assessment identifies that noise levels in close proximity to the battery stations will be in the region of 65 dB to 70 dB, with the nighttime noise level plot (Figure 5 of the report) indicating noise levels around 60 dB around these locations. • It is unclear how the conclusions have been reached, and further surveys should be undertaken to confirm the conclusions presented are accurate.
Biodiversity Net Gain		
Appendix 4.8	• '*as the installation of the buried cable will not lead to the loss, enhancement or creation of any habitat whatsoever, and the post-development habitat will be identical to the baseline, it is considered inappropriate to undertake a Biodiversity Net Gain assessment for works of this nature'*	• The BNG methodology should apply to the entirety of a development site, with guidance provided by the Department for Environment, Food and Rural Affairs (Defra)[1] stating that "*Unless exempt, developers in England are required to provide 10% BNG on all habitats within the redline boundary of their development, whether or not they are impacted*". Whilst this was added in an update to the guidance in February 2024, it predates the justification provided in the response document. • The BNG should be updated to include the alternative cable route.
4.5.11	• Table 4.2 and paragraph 4.5.11 identify rush pasture habitat in close proximity to the development area.	• Rush pasture habitat is identified as a Habitat of Principle Importance under the Natural Environment and Rural Communities Act (2006) and as a result is likely to be classified in the UK Habitat Classification as f2b Purple moor-grass and rush pastures. This habitat has a high

[1] *Defra (2023) Understanding Biodiversity Net Gain. Guidance on what BNG is and how it affects land managers, developers and local planning authorities. Available at: https://www.gov.uk/guidance/understanding-biodiversity-net-gain*

		distinctiveness in v4.0 of the BNG metric with a high degree of difficulty in creation and enhancement and a minimum standard time of 10 years to enhance/create. As a result, it is not robustly justified that the habitat of principal importance would meet the definition of a temporary impact under the various metric versions applied.
Appendix 4.6, paragraph 1.5	• *"A Biodiversity Metric was completed in 2022 using the 3.1 iteration (12827_R05a). Following the release of Biodiversity Metric 4.0 iteration from Natural England in March 2023, the assessment was undertaken again with the latest metric, for robustness. Further to this, the site layout has been amended as of December 2024, and so this assessment replaces that undertaken within the previous report (12827_R02c), and should be read in conjunction with the ES chapter."*	• The BNG assessment confirms that the assessment was updated to the latest metric version (v4.0) for robustness. However, despite a change in layout, the SEI has not considered updating the metric to the latest version of the Statutory Biodiversity Metric, released in February 2024 and updated in July 2024.

4. ENVIRONMENTAL TOPICS SCOPED OUT OF THE EIA

Glint and Glare

Introduction

4.1 RWDI reviewed the revised Glint and Glare assessment as well as the rebuttal document to RWDI's review of the previous design.

4.2 The review has been undertaken by Ryan Danks (B.A.Sc., P.Eng.), who has 15 year's experience in studying glare and is RWDI's Global Practice Leader for Building Performance which includes our glare internal and external glare services. Ryan has been the lead author of several solar glare publications. A sample of which are included below:

a. Danks, R., Good, J. and Sinclair, R., 2016. Assessing reflected sunlight from building facades: A literature review and proposed criteria. Building and Environment, 103, pp.193-202.

b. Danks, R. and Shilston, R., 2018. Simulation of urban solar reflections and their impact on building performance. Proceedings of the 2018 CIBSE Technical Symposium

c. Danks, R., Pedro, G., Predicting the Interaction Between Building Integrated Photovoltaics and the Built Environment: Opportunities and Challenges. Proceedings of the 2018 IPBSA Canada Conference

4.3 Given the change from a single axis tracking system to fixed-tilt, RWDI agrees that several of our previous comments are now moot. Those that are still relevant are included below.

4.4 That said, the updated methodology is now totally reliant on the geometric analysis rather than leveraging GlareGauge which is the standard approach outside the UK. It should however be noted that there is no single fixed standard in the UK.

4.5 Similarly, the criteria used is now entirely based on Pager Power's internal approach and does not involve the colour-coded system used in GlareGauge analyses or common thresholds for daily and annual cumulative reflection exposures used in other jurisdictions (i.e. Germany, Canada).

4.6 The above notwithstanding, RWDI does not disagree with the conclusions of the analysis.

4.7 RWDI does, however, retain its original opinion that it is **recommended** good practice to evaluate all roads, even those with lower traffic to provide full context to reviewers with respect to glare potential on drivers. While the traffic volume may be lower, the frequency/duration of potential glare impacts may be higher due to their proximity. The net effect of these two factors may make the impact more significant. The conclusions reached by Pager Power in the current assessment appear to be based upon professional judgement alone.

4.8 Given that glare "may be possible on the second floors" of some dwellings as well, RWDI would consider it prudent to apply a **recommendation** that in-principal mitigation measures to be suggested in the report. This would help illustrate that if complaints are raised by the effected building occupants or local drivers, that there is an approach to mitigate them.

4.9 RWDI has also been made aware of an objector's comment related to glint/glare impacts on ecology (specifically plants and animals) within the nearby Roundhill Wood. This is an active area of research and RWDI is not aware of any specific guidelines/criteria related to glare impacts to flora and fauna. That said, Pager Power should respond by highlighting design considerations, mitigation measures, etc. taken to address such concerns specific to glint/glare impacts where they have been explored with an ecologist for the project

Noise & Vibration

Introduction

4.9 Trium has undertaken a review of the Noise Assessment produced by LFAcoustics submitted to support the planning application (ref 23/00192/FUL).

4.10 The review has considered the following in detail:

- The application of the guidance that has been referenced;
- The measurement and use of the baseline data;
- The prediction of sound levels at receptors; and
- The evaluation of impacts.

4.11 A summary of the review comments is provided in the following sections.

Guidance Review

4.12 The Noise Assessment includes references to the following documents:

- National Planning Policy Framework 2024 (referred to as NPPF);
- BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 1: Noise (referred to as BS 5228-1);
- BS 5228-2:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 1: Vibration (referred to as BS 5228-2);
- BS 4142:2014+A1:2019 Methods for rating and assessing industrial and commercial sound (referred to as BS 4142);
- BS 8233:2014 Guidance on sound insulation and noise reduction for buildings (referred to as BS 8233); and
- World Health Organisation Guidelines for Community Noise – 1999 (referred to as WHO 1999).

4.13 Paragraph 198 of the NPPF states the following:

> *"Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:*
>
> *a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life;*
>
> *b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and*

c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation."

4.14 As noted in Paragraph 198 of the NPPF, planning decisions should ensure that new development is appropriate for its location. The council has on previous occasions identified this site as being tranquil and refused other development on this basis.

BS 5228 – Construction Noise and Vibration

4.15 BS 5228 is the code of practice for construction noise and vibration and is therefore a key document when evaluating potential impacts during construction. There are two parts to BS 5228, with part 1 related to noise, and part 2 to vibration. Only part 1 has been referenced, which is considered appropriate in this instance.

4.16 BS 5228-1 then highlights that Annex E includes different methods of establishing significant (adverse) effects. As noted in the Noise Assessment, the 'ABC' (Annex E.3.2 of BS 5228-1) is typically used for establishing a threshold noise level that would likely result in a significant noise impact. The lowest noise threshold using the 'ABC' method is LAeq,12h 65 dB.

4.17 It is reasonable that a noise threshold of LAeq,12h 65 dB has been adopted in the Noise Assessment when determining whether it is likely that significant impacts occur during construction.

BS 4142 – Noise from Fixed Items of Plant

4.18 BS 4142 is the British Standard used to evaluate sound from fixed items of plant at residential receptors. The use of BS 4142 is considered appropriate for the evaluation of noise impacts from the proposed items of fixed plant associated with the solar farm.

4.19 As noted in the Noise Assessment, the current version of BS 4142 does not include definitions of low background sound levels or low rating sound levels.

BS 8233 – Supplementary Guidance

4.20 BS 8233 has been referenced in the Noise Assessment, though does not caveat its appropriateness. **Figure 1** is taken from Section 1 of BS 8233, titled Scope.

Figure 1 Section 1 of BS 8233

> This British Standard provides guidance for the control of noise in and around buildings. It is applicable to the design of new buildings, or refurbished buildings undergoing a change of use, but does not provide guidance on assessing the effects of changes in the external noise levels to occupants of an existing building.

4.21 BS 8233 clearly states that its purpose was not intended to be used for evaluating changes to noise level to occupants of an existing building.

4.22 Given that BS 8233 clearly state its purpose and limitations it is not considered an appropriate standard for referencing and evaluating impacts from the Proposed Development.

WHO 1999 – Supplementary Guidance

4.23 The WHO 1999 have been referenced in the Noise Assessment. While these guidelines are commonly referenced, it should also be acknowledged for full context that more recent guidance has been provided by WHO, in 2008 and 2018.

4.24 The 1999 guidelines were completed prior to the WHO's guideline development process, which were more expert-based rather than evidence-based.

4.25 The 2018 guidelines were provided to reflect and consolidate the scientific knowledge on the time of health impacts over the previous 19 years (since 1999). It reflects the state-of-the-art understanding of noise and health impacts and provides a scientific basis for evaluating external noise levels.

4.26 The 2018 guidelines specifically note industrial or "neighbourhood" noise has been excluded. It notes that "they can cause considerable concern even at low levels…In general, little scientific research is available on exposure and health outcomes related to neighbourhood noise. "

4.27 This is further reinforced by the WHO' 2009 Night noise guidelines for Europe, which stays clear of specifically mentioning industrial/commercial noise except to note that there is "almost complete lack of information" on the subject to reach reliable/robust conclusions.

4.28 In conclusion, the reference to WHO 1999 is not a reliable indicator of whether significant impacts would be avoided with its adoption.

Summary

4.29 It is agreed with the applicant that the NPPF, BS 5228 (construction) and BS 4142 (fixed plant) are appropriate references to consider within the planning application process.

4.30 The references to BS 8233 is not considered reasonable, given the Standard explicitly states it is not intended for the purpose of evaluating noise at existing residential properties.

4.31 The reference to WHO 1999 guidelines is similarly not considered reasonable given that more recent WHO guidelines exist (2018) that note does not cover industrial and neighbourhood due to lack of reliable information on the potential impact on health.

Measurement of Baseline Conditions

4.32 The measurements described in the report are of sufficient duration and locations to be considered a reliable and robust representation of the existing acoustic environment.

4.33 The evaluation of the background sound level considers the Modal and Median averages during four time periods. This is consistent with the advice provided in BS 4142. The graphs provided in Appendix E illustrates the range of background sound levels. The selection of representative background sound levels presented in the Noise Assessment is reasonable.

4.34 There is no reporting of the measured residual sound pressure level. This is a shortcoming of the Noise Assessment, as including this information would be helpful for demonstrating future compliance and used in the contextual evaluation of impacts. Nevertheless, the graphs supplied in the appendices indicate that residual sound pressure levels follow closely the background sound pressure levels and while higher may not be significantly different during the night or early morning periods.

4.35 In general, the baseline noise measurements indicate that the site is generally quiet, which would support the Local Authorities' previous view that this area is generally unaffected by noise and one that is tranquil.

Prediction of Sound Levels

Construction Noise and Vibration

4.36 It is agreed that construction vehicle noise is unlikely to increase existing sound levels, i.e. significant adverse and adverse impacts are unlikely.

4.37 It is agreed that generally noise during construction will not result in significant noise impacts. It is noted that any impact would be temporary and limited to geographic extent, i.e. will not affect all receptors equally.

4.38 No construction vibration assessment has been completed, which is considered appropriate given the assumptions provided.

Operational Noise – Fixed Plant Installations

Plant Equipment

4.39 Details of the proposed items of fixed plant are provided. The information is not verified by providing the selection information and it appears there is a typographical error for the DC-DC Converter A-weighted sound pressure level at 10m (reported 59dB, though potentially 54dB).

4.40 The data provided indicates that all equipment will operate at lower noise levels during the night, which is attributed to the cooling fans not operating at 100%. This is a reasonable claim, though it is not substantiated by additional data.

4.41 It is unclear whether the main source of noise associated with each piece of equipment primarily relates to the "cooling fans" or to other potentially noise producing components of the fixed plant. The description of the noise emissions is key given the evaluations presented.

Modelling Assumptions and Calculations

4.42 The modelling assumptions are reasonable.

4.43 The assessment of specific sound levels at the receptors has been checked based on the information provided in the Noise Assessment. The checks confirm that the predictions are reliable.

Acoustic Features

4.44 The Noise Assessment (Section 6.4) notes that no acoustic features penalty has been applied. The following highlights why this assumption is not robust:

- Only tonality has been mentioned in the Noise Assessment. The equipment will switch on/off with demand though no mention has been made to the potential for impulsivity/intermittency penalties; and
- The report highlights that high frequency sound will attenuate over distance more than low frequencies, which is accurate. The report then highlights that the cooling fans produce "broadband" noise, i.e. noise across the spectrum. It follows that the high frequency sound of the cooling fan noise will attenuate more over distance than the lower frequencies. Consequently, a tonal component may exist at the receptor.

4.45 Given the acknowledged low background sound levels, it is robust assumption to consider acoustic features in the rating sound level. For simplicity, a rating penalty of 3dB could have been applied, i.e. sound includes an acoustic character that is *readily distinctive against the residual acoustic environment*.

Evaluation of Sound Impact

Initial Impact Ratings

4.46 BS 4142 describes that initial impacts can be assessed with respect to the difference between the rated sound level and background sound level. BS 4142 states that:

- A difference of **around** 10dB or more is likely to be an indication of a significant adverse impact;
- A difference of **around** 5dB is likely to be an indication of an adverse impact; and
- The lower the rating level is relative to the measured background sound level, the less likely it is that the specific sound source will have an adverse impact or a significant impact. **Where the rating level does not exceed the background sound level, this is an indication of the specific sound source having a low impact.**

4.47 According to the above, when the rated level exceeds the background there would no longer be a Low impact (before considering context) and it is more likely to be adverse as the difference approaches 5dB, and a significant adverse impact when the difference approaches 10dB.

4.48 The appraisals of impact included in Tables 6.3 to 6.7 do not follow the guidance in BS 4142, as highlighted below:

- Table 6.3 - night time and early morning ratings exceed the background sound level, therefore is above a Low impact and is approaching an adverse impact;
- Table 6.4 - night time rating is 5dB above the background, so would be an indication of an adverse impact. Early morning ratings exceed the background by 4dB, so would be an indication of an adverse impact;
- Table 6.5 - night time rating is 5dB above the background, so should be reported as an adverse impact.

- Table 6.7 - night time rating is 7dB above the background, so would be an adverse impact and approaching a significant adverse impact and early morning ratings exceed the background by 3dB, so is above a Low impact and approaching an adverse impact.

4.49 As can be seen, all receptors are expected to experience a greater than Low impact and most will likely experience an adverse impact, before context is taken into consideration.

4.50 As noted, the analysis presented in the Noise Assessment does not include acoustic features corrections, which if included (as suggested 3dB is considered reasonable) then there would adverse impacts at all receptors and a significant adverse impact at Church Farm, before context is considered.

4.51 A common planning condition would be to demonstrate a Low impact in accordance with BS 4142. This cannot be demonstrated from the assessments presented.

Contextual Analysis

4.52 A contextual analysis of noise impacts is fundamental to BS 4142 methodology. The Noise Assessment considers context only with respect to absolute threshold that were formulated (within the report) by reference to BS 8233 and WHO 1999 guidelines. The absolute threshold are unlikely to be reliable indicators of whether adverse or significant adverse impacts will be avoided.

4.53 In this instance, other considerations of context would also be the change in acoustic character of the surroundings.

4.54 It is recommended that the residual sound levels are confirmed, and appraisals consider the changes to the sound characteristics so that a robust appraisal can be made.

Public Rights of Way

4.55 The Noise Assessment identifies that sound levels close to the Public Rights of Way will approach "65-70 dB(A)". The NPPF makes it clear that decisions should be made to "… *protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason*."

4.56 While effort has been made by the applicant to reduce sound levels in the PRoW, it is clearly stated that sound levels will be significantly higher than those currently experienced. The baseline measurements and the appraisals of context included in the Noise Assessment also clearly illustrate that the area is undisturbed by noise and are in part relied upon to conclude that adverse and significant adverse impacts will be avoided at the receptors.

4.57 The Noise Assessment states that the sound level in parts of the PRoW would be similar to a "*car passing a pedestrian along a lane or footpath".* Whilst it is not disputed the sound level would be similar to a car passing, the overall conclusion that is reached from this point (no adverse or significant adverse impact) is surprising.

4.58 Table 2.1 of the Noise Assessment includes descriptions for the Adverse and Significant Adverse effects, which is taken from the Noise Policy Statement for England (NPSE). The description provided for the Significant Adverse effect is "*The noise causes a material change in behaviour and/or attitude e.g. avoiding certain activities…Quality of life diminished due to change in acoustic character of the area*."

4.59 The conclusion reached in the Noise Assessment of there being no significant adverse impact relies on those using the footpath to walk past the fixed items of plant to escape the sound. Ultimately it may result in those who have used the footpaths choosing alternative routes or diminishing the enjoyment that they previously experienced.

4.60 Overall, the Noise Assessment places a high reliance on the low existing background sound levels (when considering context) at the residential receptors. This approach when considering the impact on the PRoW is absent as it would have identified that even with mitigation measures adopted, the change in the acoustic environment would be significant. As noted in the NPPF, areas prized for their tranquillity and undisturbed by noise should be protected. Including a Solar Farm in this location would be counter to this element of the NPPF and requires greater consideration.

Conclusion

4.61 The guidance referenced are generally considered reasonable with the exception of BS 8233 and WHO 1999. The text in BS 8233 makes it clear it should not be used to appraise changes in existing sound levels or in existing buildings. WHO 1999 guidance has most recently been updated in 2018. The 2018 WHO guidance makes it clear that the assessment of industrial noise requires further evidence to make reliable conclusions on health impacts. The use of these two documents could result in impacts not being correctly identified.

4.62 The measurements of baseline conditions are robust and provides a reliable basis for evaluating impacts in accordance with BS 4142. It is recommended that the residual sound pressure level for each period is also provided along with the background sound level to assist in the contextual analysis and potentially aid future compliance testing (should the scheme be approved).

4.63 The predicted specific sound pressure levels are reliable based on the information provided in the Noise Assessment, though small typographical errors may need to be corrected and greater information on the operation of the plant would assist with the general understanding of the potential impacts.

4.64 The evaluation of the potential impacts has a couple of notable areas of disagreement:

- Does not include an acoustic features correction. A correction for tonality, intermittency and/or other sound characteristic would seem appropriate given the described baseline conditions and the mechanical nature of the introduced specific sound source; and
- The evaluation of impact presented in Tables 6.4 to 6.7 do not follow the approach described in BS 4142 and under report the potential likelihood of adverse or even significant impacts.

4.65 Correcting for both of the above would increase the number of adverse impacts being reported and indicate a potential significant impact during the night at Church Farm, Dormston receptor(s).

4.66 Usually, noise and vibration could be screened out of an ES if emissions from the fixed plant can be reduced or mitigated. However, as shown in the evaluations, the noise emissions are not sufficiently reduced in all instances and there is therefore the potential for significant effects. Given the potential for significant effects, Noise and Vibration should be scoped into the ES.

4.67 The final appraisal considering context (acknowledged to be a key feature of BS 4142) concludes there will be no adverse or significant adverse noise impact at the surrounding residential receptors. The conclusion is reached by comparing the predicted sound level (without acoustic feature corrections) to the disputed BS 8233/WHO 1999 thresholds that were established for the evaluation. A more thorough and robust analysis would also consider other features such as the change in the character of the sound compared to the existing, which may result in a significant impact occurring in practice.

4.68 The assessment of the noise impact on the Public Right of Ways presented concludes that there is not a significant adverse or adverse impact, which is disputed as the sound levels would be similar to those adjacent to a road. There would be a high change in sound levels and this would be expected to result in a change in behaviour of those who currently use the path, or result in the path no longer being used in the future.

4.69 It is clear from the measurements and evaluations presented in the Noise Assessment that the existing environment is generally undisturbed by noise. The NPPF policies suggest that areas such as these should be protected. Including the Proposed Development at this location is likely to result in the loss of amenity for existing and future residents.

Water Resources and Flood Risk

Introduction

4.70 RMA Environmental Limited is an independent environmental consultancy specialising in Environmental Impact Assessment, hydrology, Flood Risk Assessment and Surface Water Drainage Strategies for a wide range of development projects throughout the UK.

4.71 Our Project Team has significant combined experience in EIA and environmental planning and includes individual experts in each technical discipline. We have good working relationships with statutory

consultees and are corporate members of the Institute of Environmental Management and Assessment (IEMA).

4.72 RMA have undertaken a review of the following documents that have recently been submitted to Wychavon District Council under planning application reference: W/23/00270/FUL:

- Roundhill Solar Farm Flood Risk Assessment (Calibro; 13th February 2025);
- Flood Risk Assessment Addendum Technical Note 01 (Calibro; 12th February 2025); and
- Flood Risk Sequential and Exception Tests Assessment (Pegasus Group; February 2025).

4.73 The purpose of the review is to determine if the reports are in line with the National Planning Policy Framework (NPPF), associated Planning Practice Guidance (PPG) and local policy as well as best practice guidance.

Review

4.74 The Flood Risk Assessment (FRA) and associated reports such as the Sequential Test has have based on the Environment Agency's (EA's) superseded Flood Map for Planning. The EA have published new national risk information for flooding and this now includes future scenarios accounting for climate change. This new data was published on the 25th March 2025 and supersedes previous mapping.

4.75 Figure 5.1 in the latest Calibro FRA (February 2025) refers to the now superseded Flood Map for Planning. Based on the latest EA Flood Map for Planning, areas of Flood Zones 2 and 3 extend into the western part of the site just north of Roundhill Wood. This is not considered in the latest FRA which states that the development site is located within Flood Zone 1 and is at very low risk of fluvial flooding.

4.76 The FRA needs to be updated to take into account the most up-to-date flood risk information for the site which shows the development site located partially in Flood Zones 2 and 3. The latest flood data also now includes flood extents for the defended and undefended scenarios with the added effect of climate change. These extents also affect the western part of the site and to the north of Roundhill Wood and have not been considered in the latest FRA.

4.77 In January 2025, the EA updated their Risk of Flooding from Surface Water mapping (RoFSW) which includes the present day risk of flooding for various scenarios as well at the potential impacts of climate change on surface water flood risk. The latest Calibro FRA (February 2025) includes an assessment of the present-day surface water flood mapping and assesses the site in relation to the 1 in 1000-year flood surface water flood extents. There is, however, no reference or assessment in relation to the latest EA RoFSW mapping with the added effects of climate change. It is recommended that the climate change surface water extents and flood depths are assessed in relation to the development to ensure that appropriate mitigation is provided for any infrastructure proposed in these locations.

4.78 The Calibro 2025 FRA confirms that some sensitive equipment is proposed in the 1 in 1000-year present day EA surface water extent, this being the hybrid battery station and a separate inverter container. Although they are proposed to be raised at least 500 mm above ground and considered to be above the estimated flood depths, this should be assessed in line with the EA climate change surface water flood depths.

4.79 Furthermore, the sequential approach should be taken in that all sensitive equipment should be included in areas at lowest risk of flooding (i.e. outside the flood extents), where possible. The Sequential Test Assessment (Pegasus Group; February 2025) states that "*To minimise flood risk potential a sequential approach has been applied to locating vulnerable land uses within the Site. The more vulnerable equipment is sequentially located within Flood Zone 1 and is at low risk of flooding from rivers and the sea*". This should be checked and updated (if needed) in line with the latest EA Flood Map for Planning which now shows that part of the site is located in Flood Zones 2 and 3.

4.80 The Calibro 2025 FRA includes a section on surface water drainage which states that the battery storage units will be located on a granular sub-base and, as a result, are considered permeable.

4.81 There is significant risk associated with battery storage units and the potential for adverse impacts on the local environment in the event of a fire. This predominantly includes the risk of fire-water contamination of surface water and/or groundwater which are concerns that have been expressed in many recent planning applications throughout the UK where battery units are proposed and do not propose a suitable sealed and contained strategy for dealing with firewater runoff. This has not been

considered in the latest Surface Water Drainage Strategy which simply states that the battery units will be located on a permeable surface.

4.82 During a fire, water should be used to cool the units adjacent to the alight battery containers and applied to the boundaries of the fire area. The National Fire Chiefs Council (NFCC) 'grid scale battery energy storage system planning guidance' states that: "*Suitable environmental protection measures should be provided. This should include systems for containing and managing water runoff. System capability/capacity should be based on anticipated water application rates, including the impact of water based fixed suppression systems*."

4.83 The infiltration-based strategy that has been proposed for the battery units could pose an unacceptable risk on groundwater quality as the current strategy fails to provide appropriate mitigation for the containment and management of potentially contaminated surface water runoff in the event of a battery fire on site. The current strategy would result in contaminated firewater infiltrating into the ground via the proposed granular base. This could result in contamination of the underlying 'Avon Warwickshire groundwater body' which currently is classified as having a good quantitative and chemical status and is considered to be a Highly sensitive receptor. The risk of fire water contamination associated with the battery units on site should be considered and an appropriate mitigation strategy should be put in place that avoids infiltration to ensure there are no adverse impacts on the environment.

4.84 The slope of the site has not been considered in the FRA or the Surface Water Drainage Strategy. The slope needs to be considered, in particular how surface water will be managed on steeper slopes. The strategy talks about the change in land use as a result of the development (i.e. the cessation of arable farming) and the benefits this will have on the ability for soil to accept rainfall. However, there is no consideration of how the slopes of the site could impact exceedance flows and how runoff associated with the panels will behave on steeper sloping land. Paragraph 3.2.1 states that the steepest slopes on site have gradients of 1 in 10. In many cases, features such as swales should be included on the downslopes of fields to help control any exceedance flows as a result of panels being included within the scheme. This is to ensure there is no increase in flood risk off site when compared to the existing scenario.

5. CONCLUSIONS

5.1 Trium, on behalf of local residents through Farrer and Co have undertaken an independent review of the Supplementary Environmental Information which accompanies the Environmental Statement submitted in 2023 as part of planning application W/23/00270/FUL for the development of Land East of Stock Green (adjacent to Roundhill Wood), Wychavon, Worcestershire. The Supplementary Environmental Information was prepared by Pegasus Group on behalf of the Applicant.

5.2 Trium have identified a number of further information requests that it is considered that additional information is required prior to the decision of planning permission, these are summarised in Table 8, with key conclusions drawn out below.

- The EIA Regulations clearly define that the assessment should comprise everything within the red line plan as this is part of the proposal. As it stands, the SEI makes reference to the alternative cable route, but it is not located within the red line boundary.
- The ES does not provide sufficient information on climate change.
- The ES refers to the proposals as 'temporary', with a lifespan of approximately 40 years. Further justification of how such a lifespan can be deemed temporary when relating to environmental effects should be provided.
- The site selection process is not covered in any detail in the design evolution and alternatives section on the ES. Given this is an important part of the selection of the site and essential in understanding the alternatives considered and any potential justification for selection of this site and greenfield development, this should be provided.
- The Cultural Heritage SEI does not follow best practice guidance, does not include a robust assessment of significance and does not adequately assess the contribution made by setting to the significance of each asset. Additionally, there is a lack of methodology for determining the significance of effects in the Cultural Heritage SEI.
- Regarding buried heritage assets, the assessment does not comply with the Town and Country Planning (Environmental Impact Assessment) 2017 Regulations as it does not provide an accessible description of the environmental effects of the Proposed Development on archaeology.
- In relation to the Landscape and Visual Impact Assessment, it is considered the effects presented are under-reported and promote the scheme. There is no assessment of the associated infrastructure, only the solar arrays themselves. Additionally, the mitigation presented is overly reliant on visual screening of the proposals.
- In the absence of baseline information confirming the potential presence of roosting bats and understanding the context of baseline commuting/foraging behaviour on the site and species associated with this, it cannot reasonably be concluded that impacts will be minor - particularly considering the uncertainty of impacts identified for the development type. The desk study records identify eight species of bats being recorded within 2 km of the site, with activity in seven of these shown in one study to be negatively influenced by solar farms.
- The BNG does not include the alternative cable route within the assessment. The omission of this is not justified and under best practice guidelines, this should be included.
- It is clear from the measurements and evaluations presented in the Noise Assessment that the existing environment is generally undisturbed by noise. The NPPF policies suggest that areas such as these should be protected. Including the Proposed Development at this location is likely to result in the loss of amenity for existing and future residents.
- Given the potential for significant adverse effects during the night at Church Farm, Dormston receptor(s) in relation to noise and vibration, this topic should have been scoped into the SEI.

6. FURTHER INFORMATION

Table 8 Further Information

Further Information
Regulatory Requirements
• Alternative cable route should be included in the Red Line Boundary and assessed as such; • Climate change and sustainability does not form a sufficient part of the ES and it should be covered in more detail; • Consideration and assessment of the evolution of the baseline should be provided in line with the EIA Regulations; and • Bat surveys should be undertaken and inform the ecology assessments within the ES (see Ecology review in Section 4 for further details).
Review of Introductory and Concluding Chapters of Environmental Statement and the NTS
• Baseline: – Further consideration of any future and/or evolving baseline conditions. If it is not relevant justification should be provided. • Proposed Development: – Clarity on whether the proposals are either 'temporary' or 'permanent'. If the proposals are considered to be temporary, further information is required on the decommissioning of the project; and – Clarity on the alternative cable route, why this has not been included within the red line boundary and if both cable routes are viable options. • Alternatives: – Following further consideration and update to the ES (as required), the 'No Development' scenario should be updated; and – The site selection process is relevant in the context of the use of agricultural land and any significant effects which may arise as a result of the Proposed Development, this should form part of the Alternatives analysis in the ES. • NTS: – Mitigation requirements should be made clear, a summary table would be useful to include; – Any updates required to the main ES (Chapters 1 – 5) should be incorporated into the NTS; and – Figures to be updated to be made clearer. • Mitigation: A clear and comprehensive list or table of the mitigation measures required should be provided.
Topics Scoped into this ES
• Landscape – Further information should be provided on why 'moderate' effects are classed as 'not significant'; – An assessment of the infrastructure associated with the Proposed Development including DNO Station, CCTV and inverters; – Landscape value has not been adequately assessed; – Visual impacts have not been comprehensively assessed; – Mitigation is over-reliant on visual screening of the proposals with no explanation as to why and whether this would be in keeping with the wider landscape and visual context of the site; – The scale of the site and proposals in comparison to the receiving landscape has not been assessed;

Further Information
– Updated photography for Viewpoint 9 which shows a representative typical view experienced by road users; and – Updated assessment of the operational effects to correct the inconsistencies. • Cultural Heritage (Built Heritage): – An assessment of the construction and decommissioning phases of the Proposed Development on above ground heritage receptors; – A worst-case scenario assessment to assess the Proposed Development without screening from vegetation (i.e. a winter scenario); – An assessment of the infrastructure associated with the Proposed Development including DNO Station, CCTV and inverters; and – Inclusion of a Year One scenario (consistent with the LVIA) to understand the impacts of the Proposed Development whilst the proposed landscape strategy is in its infancy. • Cultural Heritage (Archaeology): – A clear description of the levels of less than substantial harm to avoid phrases such as 'at the lower end of the less than substantial harm spectrum'; and – A description of the significance of the individual assets, rather than grouped together as 'non-designated heritage assets'. • Biodiversity and Ecology: – Undertake bat roost assessments (presence/ absence surveys) and appropriate roost characterisation surveys if roosts are found, on trees with moderate or high features that are near the construction areas.; – Undertake bat activity surveys to understand how bats are utilising the site and any potential impacts the Proposed Development could have on those behaviours; and – Inclusion of the alternative cable route within the BNG assessment.
Topics Scoped out of the ES
• Glint and Glare: – Undertake an assessment of all roads in proximity to the Proposed Development; and – Provide in-principal mitigation measures for building occupants and drivers which could be affected by potential glare. • Noise and Vibration: – Provide justification on the use of BS 8233 within the Noise Report; – Update report in line with the latest WHO 2018 Guidance; – Provide reporting of the measured residual sound pressure level; – Confirm the residual sound levels and changes to sound characteristics; and – Provide acoustic features correction for tonality, intermittency and/or other sound characteristics. • Water Resources and Flood Risk: – The FRA and associated reports such as the Sequential Test Assessment need to be updated in line with the latest EA Flood Map for Planning (March 2025) and include the flood extents with the added effects of climate change as the updated flood risk mapping shows that the site is partially located within Flood Zones 2 and 3; – The FRA should assess the development in relation to the latest RoFSW mapping extents and depths with the added effects of climate change;

Further Information
– Justification should be provided as to why a sequential approach has not been undertaken in reference to the sensitive equipment that is proposed to be located within the surface water flood extent (i.e. the battery unit and inverter unit); – The risk of fire water contamination associated with the battery units on site should be considered and an appropriate mitigation strategy should be put in place that avoids infiltration to ensure there are no adverse impacts on the environment including impacts on groundwater; and – The slope within the site needs to be considered to set out how surface water will be managed on the steep slopes. Consideration should be given to including swales on the downslopes of fields to help control any exceedance flows from the solar panels.

Appendix A Landscape Character Comments

Potterton Associates Ltd has undertaken a peer review of Appendix 2.1a of the Supplementary Environmental Information. Columns A – C have been taken from Appendix 2.1. of the SEI, and Column D are Potterton Associates Ltd comments on the Pegasus Group findings.

A. Receptor	B. Magnitude	C. Significance	D. Potterton Associates Review
EIA Assessment area (aka 'The site')	Medium	Moderate	The assessment is incorrect and misleading. The change to the character of the site (in totality) is 100% and of major significance at year 1 and at year 15 (even with mitigation due to the overwhelming scale of the scheme).
NCA 106 Severn & Avon Vales	Negligible	Negligible	Agree that this is not the most relevant category to measure against.
RCA Mid Worcestershire Forest	Negligible	Negligible	Agree that this is not the most relevant category to measure against.
Wooded Estatelands	Low	Minor	Incorrect. Solar schemes are not an existing characteristic of this area.
Principle Timbered Farmlands	Negligible	Negligible	Given that solar schemes are not a characteristic of this area. I suggest 'minor' at least.
Enclosed Commons	Negligible	Negligible	Noting that solar schemes are not a characteristic of this area.
Wet Pasture Meadows	Negligible	Negligible	Noting that solar schemes are not a characteristic of this area.
LDU MW 155 / 155a	Medium	Moderate	Incorrect. Some 75% of MW155(a) is 'the site' and therefore the character will change. The magnitude and significance should be major and significant in EIA terms.
LDU MW96.1 & LCP MW96.1c	Medium	Negligible	Given that part of the site is within this category, and it abuts some 2.75 kilometers of the site, the effect on this grouping is, I consider to be incorrect. The significance should be noted as moderate and Significant in EIA terms.
LDU MW96.3a	Medium	Negligible	Incorrect. Given that part of the site is within this category (to include the car park), and it abuts some 275 metres of the site, the effect on this grouping is incorrect. A moderate significance should be noted.
Other LDU's & LCP's covered by the cable route	-	Negligible	No sensitivity has been provided. This should be updated.
Topography	Medium	Negligible	This is not relevant to the assessment, given the topography of the site will not change.
Trees & hedgerows	Medium / high	Moderate / major beneficial	This would be beneficial if installed on its own. Given the trees and hedgerows form part of the mitigation, it should be considered in conjunction with the solar arrays and associated infrastructure.
Landcover	Low	Minor beneficial	It is unclear how the Applicant has concluded this to be minor beneficial, as this could happen irrespective of the scheme and is not a sound measure of actual benefit.

Appendix B Visual Effects Comments

Potterton Associates Ltd has undertaken a peer review of the visual impact assessment submitted as part of the SEI. Charles Potterton has been to all viewpoint locations as part of this peer review. Columns A – F have been taken from the updated Visual Effects Table. Column G comprises the peer review.

Blue shading is where Potterton Associates consider 'Significant in EIA terms' should apply with a change to the threshold. Yellow shading denotes under-reporting and therefore an incorrect assessment, which should be concluded as 'significant' in EIA terms.

A. VP Ref	B. User type	C. Sensitivity	D. Magnitude (Yr 1)	E. Significance (Yr 1)	F. Significance (Yr 15)	G. Potterton Associates Review
01	PROW	High	Negligible	Negligible	Negligible	Agree.
02	PROW	High	High	Major adverse	Moderate adverse	The inclusion of the solar array changes the nature of the site from agricultural land to infrastructure. The blocking of the view as per the montages is almost as harmful as the view of the panels themselves.
03	PROW	High	High	Major adverse	Major adverse	The inclusion of the solar array changes the nature of the site from agricultural land to infrastructure. The blocking of the view as per the montages is almost as harmful as the view of the panels themselves.
04	PROW	High	Low	Moderate adverse	Negligible	The magnitude has been under reported given there are wide open views of the site from this PROW. With the inclusion of landscaping, the effect at Year 15 would still be significant (major adverse).
05	PROW	High	Medium	Moderate adverse	Negligible	Incorrect. Given the degree of change within the photomontage, the Year 1 view should be noted a 'Major Adverse'.
06	PROW	Medium	Medium	Moderate adverse	Negligible	Incorrect. Given the degree of change within the photomontage, the Year 1 view should be noted a 'Major Adverse'. With the inclusion of landscaping, Year 15 would reduce to 'Moderate Adverse' and Significant.
07	PROW	High	High	Major adverse	Major adverse	Agree.
08	Road user	Medium	Negligible	Negligible	Negligible	Incorrect. This view does not represent all of Middle Road. There are clear views of the upper part of the site from the junction with Earls Common Road.
09	Resident	High	High	Major adverse	Moderate adverse	Whilst the significance of effect is noted as Major Adverse and Significant, this view is not representative of road users as there is obstruction.
10	PROW	High	Negligible	Negligible	Negligible	This is not a publicly accessible location and should not have been included.
11	Church visitors	Medium	Negligible	Negligible	Negligible	Agree.
12	Resident	High	Medium	Major adverse	Negligible	It is unclear why a 'negligible' impact has been concluded for Year 15, even with mitigation in place. With mature planting, at Year 15, the effect would reduce to Moderate Adverse and Significant.
13	PROW	High	Negligible	Moderate adverse	Moderate adverse	Whilst a significant effect is concluded, it is still under reported.

						A negligible change would be unlikely between Year 1 and Year 15, given the panels are still visible with the mitigation in place.
14	PROW	High	High	Major adverse	Major adverse	Agree.
15	PROW	High	Negligible	Negligible	Negligible	Agree.
16	PROW	High	Negligible	Negligible	Negligible	Agree.
17	PROW	High	Negligible	Negligible	Negligible	The site is visible as receptors walk from vp17 to vp1. Due to elevation, the proposed mitigation would have little impact on this view and therefore the Proposed Development would have a significant impact (moderate) at Year 1 and Year 15.
18	PROW	High	Negligible	Negligible	Negligible	This is not fully representative of views from the Millennium Way – there are clear views from the path as it approached Earls Common Rd to the east.
19	PROW	High	Negligible	Negligible	Negligible	Given the solar array would be visible at Year 15, the negligible change is unlikely.
20	PROW	High	High	Major adverse	Moderate adverse	The inclusion of the solar array changes the nature of the site from agricultural land to infrastructure. The blocking of the view as per the montages is almost as harmful as the view of the panels themselves.
21	PROW	High	High	Major adverse	Major adverse	Agree.
22	PROW	High	High	Major adverse	Moderate adverse	Disagree with the reduction in harm.
23	PROW	High	Low	Moderate adverse	Negligible	From the elevated viewpoint, the mitigation scheme will not change or reduce the initial impacts.
24	PROW	High	High	No change	No change	Despite a major adverse during construction when the site is visible, when built at Year 1 there is no change from the pre-construction scenario, this is incorrect and misleading. Year 1 and Year 15 effects should be updated.

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