



ALCESTER TOWN COUNCIL

Office of the Town Clerk

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To whom it may concern,

Please see below the Formal Response from Alcester Town Council to the Arrow Valley Solar Farm Consultation. If you have any queries, please do not hesitate to contact the Town Clerk, Mrs Vanessa Lowe, or the Deputy Town Clerk, Mrs Kyla Brown on the above contact details.

DESIGN

***Site 1 – Abbots Morton, Rous Lench, Weethley and Wood Bevington
Do you have any comments about the design of Site 1 including the location of solar infrastructure, battery storage (BESS), substation or public rights of way?***

Alcester Town Council supports the views of the parish councils and residents of Abbots Morton, Rous Lench, Weethley and Wood Bevington, who are most directly affected, and asks the Applicant to give those views full weight. We do not have detailed knowledge of individual field parcels and rely on their local knowledge.

We have four general concerns:

1. Site 1 is divided into six sub-sites and would host both the battery energy storage system (BESS) and a new 400kV substation. We ask the Applicant to explain why this concentration of infrastructure is appropriate here and to show its distance from homes and public rights of way.
2. The BESS and the site as a whole must be supported by a published fire strategy. The Arrow Valley Solar Farm (hereafter 'AVSF') website states that an outline Battery Safety Management Plan will be submitted with the application; that the Applicant will work closely with the relevant Fire & Rescue Service as the project develops, and the battery energy storage system will be designed in line with National Fire Chiefs Council Guidance. This Battery Safety Management Plan is not yet available – nor is the input from the relevant Fire & Rescue Service. We are therefore unable to comment on the information and request that once this information is available, it is available for further Consultation. In the interim, we have significant concerns regarding the significant fire safety risk of the project, and further comments are submitted elsewhere in our Response.
3. Site 1 contains or adjoins a number of important heritage assets, including Rous Lench Court and its registered park, Wood Bevington Manor and several other listed buildings. We have not seen an assessment of the effect on these heritage assets (Chapter 9 of the Interim Environmental Report (hereafter 'IER') only provides the baseline but does not state the predicted effect on any individual asset.
4. The areas managed for nature should be secured in the Development Consent Order for the life of the scheme and not left to voluntary commitments.

Site 2 - Broom, Dunnington, Stratford Priors and Wixford

Do you have any comments about the design of Site 2 including the including the location of solar infrastructure or public rights of way? Additionally, do you have any comments about either of the proposed options for our substation location on this site?

Site 2 is the closest of the four sites to Alcester and its effects will be felt by our residents as well as those in neighbouring villages. We support the views of the parish councils and residents of Broom, Dunnington, Salford Priors and Wixford and ask the Applicant to give them full weight.

Fire risk. A major incident was declared on 13 August 2026 when a fire started in a field at Tothall Lane, Salford Priors. Smoke from the fire significantly impacted major highway routes in the area and the A46 was closed in both directions between Arrow Services and Salford Bridge.

Local knowledge indicates, therefore, that this area is a fire risk during dry summers - which will be exacerbated by large areas of solar equipment and battery storage. Furthermore, the location of the fire on Tothall Lane is in very close proximity to the location of the Site 2 400kv substation (both Option A & B). We request evidence of the source of the required water supply for the BESS and indeed, whether there is sufficient water capacity in close enough proximity to all proposed BESS sites across the project's route.

Similarly, we are very concerned about the proximity of Dunnington Primary School (in the middle of Site 2 at sub-site 2(a)), and the potential fire risk posed at this location. We request that the Applicant undertakes a specific fire risk assessment of the impact on all schools in close proximity to substations or BESS, including nursery and early-years provision – for example, Salford Priors Academy, Cleeve Prior Primary, The Littletons Academy.

Further comments on the significant fire risk associated with this project are submitted elsewhere in our Response.

Heritage. Part of Site 2 (sub-Site 2(a)) lies about 10 metres from Ragley Hall Park and Garden (registered Grade II*), and the Chapter 9 baseline also places Moor Hall, Ragley Park, Evesham Lodge and a scheduled monument next to the site. The consultation material does not yet include an assessment of the effects on these heritage assets.

On the two substation Options (A and B), we ask the Applicant to publish a clear side-by-side comparison covering visual prominence, noise, distance from homes, flood risk, heritage and effect on public rights of way. In the absence of that evidence, we would favour whichever option is furthest from homes and least visible from public viewpoints and from Ragley Park.

Flooding. Local knowledge indicates that the area next to the river in Broom is prone to flooding, and it is likely that any solar panels closest to the river will be impacted by flood water. The consultation material does not provide sufficient flood assessment information on this area of land, nor the impact on flood risk or surface water run-off from the installation of solar panels on existing dwellings in that part of Broom. Large expanses of non-porous banked panels can impact, in unplanned ways, flooding behaviours (e.g. onto rural roads).

Footpaths. We welcome the proposed permissive path linking to the Two Shires Greenway in principle. A permissive path can be withdrawn, so we ask that this, and indeed any other proposed footpaths are secured upfront through the Development Consent Order or a legal agreement, with a commitment to maintain it for the life of the scheme and to have them added to the Definitive Map.

Site 3 - Bickmarsh, Cleeve Prior, Dorsington and Pebworth

Do you have any comments about the design of Site 3 including the location of solar infrastructure, substation or public rights of way?

We support the views of the parish councils and residents of Bickmarsh, Cleeve Prior, Dorsington and Pebworth. Site 3 is divided into seven sub-sites and includes a new 132kV substation. We are concerned that this fragmented layout will give an impression of solar development across much of the surrounding landscape rather than in one place.

We ask the Applicant to show how it has minimised the number and spread of sub-sites, to show the substation's visual effect from public rights of way and nearby homes, and to assess the effect on nearby heritage assets, including the Grade II* Church of St Andrew at Cleeve Prior, which Chapter 9 places about 150 metres from sub-Site 3(a).

Site 4- South Littleton

Do you have any comments about the design on Site 4 including the location of solar infrastructure or public rights of way?

We support the views of the parish council and residents of South Littleton. As the smallest site, with no sub-sites, we ask the Applicant to explain what Site 4 contributes to the scheme's total output and whether the scheme would remain viable without it – especially in the context of an additional 25 hectares being added to Site 1 since the Scoping Opinion was submitted in March 2026. If the contribution of Site 4 is marginal, its inclusion should be reconsidered. We also note that the geophysical survey results suggest clusters of late prehistoric settlement remain at Sites 3 and 4 (IER Chapter 9, paragraph 9.6.15) and ask for confirmation as to how these will be protected.

Do you have any comments about the location or design of our underground cable route corridor, which stretches from the Feckenham Substation in the north all the way to Site 4?

We support the concerns of the parish councils along the route. The corridor is long, running from Feckenham south past Inkberrow to Site 1, between Dunnington and Cock Bevington to Site 2, between Salford Priors and Bidford-on-Avon, near Cleeve Prior and between North Littleton and Pebworth to Site 4. Two route options remain between Sites 2 and 3, and the corridor encircles the Feckenham substation to keep options open. A wide corridor with unresolved options leaves landowners and communities in uncertainty, and we cannot meaningfully judge it.

We ask the Applicant to narrow the corridor and confirm a preferred route at the earliest opportunity, with reasons. We also ask for: the width of the working area and permanent easement; how crossings of roads, the A46, watercourses (including the River Arrow), railway lines and public rights of way will be made; the length of trench open at any time; the purpose, route and construction method of any pipelines; and how soils, hedgerows and field drainage will be restored. The chapter on historic environment also identifies peat deposits and potential palaeochannels along the corridor near Feckenham, which need specific protection. Any disruption to the road network during cable laying should be agreed in advance with the relevant highway authorities.

This information, once complete, should be subject to further consultation with communities, statutory consultees and local stakeholders so that they can assess the scheme as a whole, make informed representations and ensure that any necessary changes are considered before the application is submitted.

General Comment:

Alcester Town Council notes that in the Interim Environmental Report, the Consultation Brochure and on the AVSF website, safe site access points, temporary construction

compounds, creation of internal access tracks and road improvements are 'currently under consideration prior to finalising ahead of application submission' – with negotiations ongoing with landowners.

The incompleteness of this information prevents Alcester Town Council from meaningfully commenting on the final proposals because key elements of the scheme that could have significant environmental, transport, highway safety and community impacts have not yet been determined. The identification of safe site access points, temporary construction compounds, internal access tracks and road improvements is fundamental to understanding how the development would be constructed and operated, how construction traffic would access the site, and what effects the proposals may have on the surrounding road network, local residents, schools, businesses and the wider environment – for a period of potentially 60 years over the lifespan of the project.

Until these details are confirmed, it is not possible to assess the full extent of the likely impacts, determine whether appropriate mitigation measures will be effective, or establish whether the proposals are acceptable in planning terms. In particular, the location of access points and construction compounds, together with the routing of construction traffic and the need for highway improvements, may materially influence the level and distribution of impacts on local roads, road safety, congestion, noise, dust, air quality, landscape character and nearby communities (including schools). These matters cannot be adequately assessed in isolation from the final site layout and construction arrangements.

Further consultation is therefore essential to ensure that the public, local communities and statutory consultees have a meaningful opportunity to review and comment on the complete proposals, rather than being asked to respond to an incomplete or evolving scheme. If these important details are finalised only after the current consultation has closed, there is a risk that significant changes affecting local communities and the environment will be introduced without adequate public scrutiny. This would undermine the transparency and effectiveness of the consultation process and could prevent legitimate concerns from being identified and addressed at an early stage.

Alcester Town Council cannot, therefore, provide a fully informed or definitive response to the proposals until the outstanding details have been confirmed and the resulting impacts properly assessed. A further meaningful consultation should take place once this information is available, supported by updated environmental assessments and clearly identified mitigation measures, and before the proposals are finalised for submission. This would enable Alcester Town Council and other consultees to assess the scheme as a whole, make informed representations and ensure that any necessary changes are considered before the application is submitted.

ECOLOGY

Do you agree with our approach to provide buffers between sensitive ecological receptors and any infrastructure?

In principle yes, but there is only high-level information on how wide the buffers will be or how they will be set, especially in relation to proximity from existing dwellings across each of the four sites. We ask that buffer widths are based on survey evidence and the advice of Natural England and the local wildlife trust, rather than a standard distance – as suggested on pages 13 and 21 of the Consultation Brochure (September 2026).

For example, page 13 of the Consultation Brochure provides:

'In accordance with our design principles, we will set back or Scheme from:

- *Woodland, hedgerows and trees;*
- *Watercourses, ditches, drains and ponds;*
- *Important habitats for local wildlife;*

- *Residential properties and gardens;*
- *Footpaths and bridleways.'*

This is vague and will vary depending on the circumstances of each of the ecological receptors and infrastructure affected. We support the views of the parish councils and residents along the route insofar as they request buffer widths for specific locations or dwellings etc.

Particular attention should be given to the River Arrow corridor and its floodplain, hedgerows and any ancient woodland. Management of buffers and the areas 'managed for nature' should be secured for the operational life of the scheme and through decommissioning.

Furthermore, we request that any fencing solutions are approved by Nature England or the relevant statutory authority to ensure that physically installed buffers are appropriate for local wildlife.

Are there any habitats, features or green corridors that are particularly important and should be further protected and enhanced?

We support the views of the parish councils and residents of those parishes affected within each of the four Sites.

Alcester and the surrounding countryside have several particularly important habitats, landscape features and potential green corridors that merit protection and enhancement. The priority should be to conserve the River Arrow and its tributaries, the River Alne and its confluence with the Arrow, maintenance of the network of hedgerows and mature trees, protection of species-rich grassland and wetlands, and connection of these habitats through the farmland and green spaces around the local area.

We consider that a key consideration is to look beyond the four individual Sites: wildlife depends on a connected network of rivers, fields, hedgerows, woodland, ponds and green spaces, particularly where the proposed solar farm development could fragment existing routes. We request that the Applicant seeks certification from wildpower.org regarding biodiversity, as has been secured at [West Raynham Solar Farm and Dunmow Solar Farm](#).

Do you have any views on our approach to ecological mitigation or enhancement in general?

We support meaningful biodiversity enhancement but ask that it is measured, monitored and enforceable, and not used as a substitute for avoiding harm. The River Arrow and its tributaries, together with connected hedgerows and field margins, form green corridors that link Alcester to the wider countryside, and we ask that these are protected and strengthened. Enhancement should be delivered near the affected habitats and reported on publicly each year.

We also consider that the Construction Environmental Management Plan should be available to consultation prior to submission of the application. As mentioned above in relation to ongoing negotiations with landowners regarding access points and access tracks, further consultation is essential to ensure that the public, local communities and statutory consultees have a meaningful opportunity to review and comment on the complete proposals, rather than being asked to respond to an incomplete or evolving scheme. If these important details are finalised only after the current consultation has closed, there is a risk that significant changes affecting local communities and the environment will be introduced without adequate public scrutiny. This would undermine the transparency and effectiveness of the consultation process and could prevent legitimate concerns from being identified and addressed at an early stage.

LANDSCAPE AND VISUAL AND HISTORIC ENVIRONMENT

Are there any views that are especially important to the local identity, historic character or landscape character of the area?

Viewpoints. There are important views affected by the proposed development: we support issues raised by the local parishes insofar as their important viewpoints and local area is impacted. We ask that the Applicant includes viewpoints from the approaches to Alcester, from within Ragley Park and from elevated and publicly accessible locations, with photomontages showing winter and summer conditions and the early years after construction.

Conservation areas. We request publication of the distances and the visual evidence for each Conservation Area along the route of AVSF and confirmation how the duty to pay special attention to the character and appearance of conservation areas has been met.

Historic environment. We are concerned that we have not seen a detailed assessment of the effects on designated heritage assets. Chapter 9 of the Interim Environmental Report describes the baseline (eight scheduled monuments, two registered parks and gardens, nine conservation areas and 322 listed buildings) but does not state the predicted effect on any individual asset. The registered park at Ragley Hall is about 10 metres from sub-Site 2(a), and Ragley Hall itself is Grade I listed. We ask for a full, asset-by-asset assessment, including views and the effect on setting, before the application is submitted (for more detail, please see Table A below).

General observations on Chapter 9 of the Interim Environmental Report

Our observations on Chapter 9 and what we ask for are set out in Table A below.

Ref	Observation	What we ask for
A1	No assessment of effects. Paragraph 9.6.18 promises a summary of significant effects, but the chapter has none. Table 9-6 gives the value of nine key receptors only. Table 9-5 is a method matrix, not a result.	Publish, before the application is submitted, a full assessment for each receptor: value, impact magnitude, significance of effect and level of harm (substantial or less than substantial), before and after mitigation. Publish Volume 3 Appendices 9.2 (desk-based assessment) and 9.4 (full receptor list).
A2	Ragley Hall. The registered park is about 10 m from sub-Site 2(a) (9.6.8). Table 9-6 lists the park, but the Grade I Hall, Stable Block and lodges (9.6.5) are not listed as key receptors. The Evesham Lodge is 80 m from sub-Site 2(a). Table 9-6 notes that the park has a detached area under Oversley Castle that acts as an 'eyecatcher' for the Hall.	Assess the Hall, park and garden, Stable Block, lodges and Evesham Lodge individually. Include views from the Hall and park, views into the park from outside, and intervisibility with the Oversley Castle eyecatcher and the sites. Provide zones of theoretical visibility and photomontages and show how the design for sub-Site 2(a) responds.
A3	Rous Lench Court. The registered park (Grade II*) is about 80 m from sub-Site 1(a) (9.6.8), and the house is Grade II*, but neither appears in Table 9-6. Table 9-6 lists only a tower 600 m away.	Include Rous Lench Court, its park and the other Grade II* assets near Site 1 (Wood Bevington Manor is listed; Shurnock Court and others should be assessed) in the effects assessment.

Ref	Observation	What we ask for
A4	Inconsistent values. Table 9-3 gives 'High' value to Grade I, II* and Grade II listed buildings, but Table 9-6 gives Grade II buildings 'Medium'. Under Table 9-5 this changes the result (for example, Medium value with Moderate impact is 'Moderate', whereas High value is 'Moderate or Large').	Explain the inconsistency and reassess all Grade II listed buildings using the criteria in Table 9-3 or justify any departure in writing.
A6	Listed buildings scoped out. 274 of 322 listed buildings are said not to be affected (9.6.17), leaving 48. The chapter gives no list. The figures are also inconsistent: paragraph 9.6.3 gives 322 listed buildings plus two registered parks, while paragraph 9.6.5 says the 322 includes the parks.	Provide the full list of the 274 with the reason for each and give one consistent set of figures.
A7	Study area. The outer area is 1.5 km for Grade I, II* and scheduled monuments, but only 1 km for other assets including Grade II buildings (9.5.1), although Historic England asked for up to 1.5 km where setting contributes to value (Table 9-2).	Confirm in writing that Historic England agrees the 1 km limit and justify it with a zone of theoretical visibility for a development of this scale.
A9	Archaeology. The evidence is geophysical survey only. Multispectral survey is still to be done and the cable corridor survey is incomplete (9.5.5). The chapter reports 81 non-designated assets in the Order Limits, extensive ridge and furrow, cropmarks suggesting prehistoric settlement, probable late prehistoric settlement at Sites 3 and 4, and peat and palaeochannel potential near the Feckenham end of the corridor (9.6.10 to 9.6.15). No trial trenching is mentioned.	Complete survey and targeted evaluation before the application, so that important remains are avoided and preserved in place by design. Publish the outline Archaeological Mitigation Strategy. State foundation type and depth, cable trench depth and the location of compounds and haul roads relative to known remains.
A10	Historic landscape. The chapter describes 16 historic landscape types, with time-depth from Feckenham Forest assarts and burgage plots, and notes hedgerows define fields (9.6.13). It does not say how much hedgerow would be removed for access, cables or panels.	Quantify hedgerow loss and field boundary change by site, and show where important hedgerows are protected under the Hedgerows Regulations 1997.
A11	Consultation record. Table 9-2 lists Historic England, Warwickshire and Worcestershire County Councils and Wychavon District Council. It does not list Stratford-on-Avon District Council, parish councils, the Gardens Trust or the owners of Ragley Hall.	Confirm whether these bodies have been consulted and publish their comments. We ask in particular that the owners of Ragley Hall and the Gardens Trust are consulted on the park and garden.
A12	Operational and decommissioning effects. Decommissioning is 'scoped out' for most topics and the chapter relies on an outline Decommissioning Plan we have not seen. The cables to Feckenham are to be left in situ. The operational life of the cabling is not stated.	State the operational life of the cabling. Explain how setting effects over that period are treated as 'temporary' or permanent and publish the outline decommissioning plan.

Do you have any thoughts on our landscaping and planting proposals which will help screen views of the development, including locations for new trees and hedgerows?

New hedgerows and trees take years to mature, so screening will not be effective when the scheme is first built and the effects in that period should be assessed honestly. Planting should use locally appropriate native species, avoid blocking historic views and be secured with a maintenance and replacement commitment, which is especially important in the context of our changing climate.

PUBLIC RIGHTS OF WAY

Are there any walking, cycling or horse-riding routes that you are concerned could be affected by the development?

With regard to concerns about affected routes, we support the views of the parish councils, local walking, cycling and riding groups and the Rights of Way team of the relevant county councils.

Do you agree with our approach to provide buffers between Public Rights of Way and any infrastructure?

In relation to buffers, we cannot say whether the approach is adequate without the proposed widths. A path between panel fencing on both sides can feel enclosed even with a nominal buffer. We ask that the Applicant adopts wider buffers and planting where routes are used for recreation, that closures and diversions during construction are identified in advance, and that paths remain open wherever it is safe.

The documentation suggests a standardised approach to buffer distance, especially in relation to sensitive ecological receptors and infrastructure. This vagueness potentially leads to inconsistency, and uncertainty for residents. We support the views of the parish councils and residents along the route insofar as they request buffer widths for specific locations including schools and dwellings etc.

Are there any Public Rights of Way where we should reconsider our proposed approach, for example, by providing more screening or retaining long-distance views?

We support the views of the parishes, user groups and the relevant county council Highways Departments on specific routes. As a general principle, routes used for recreation or part of longer walks should have additional screening and, where possible, retain long-distance views.

TRANSPORT AND ACCESS

Which local roads or junctions are you aware of that already experience congestion, queueing or safety concerns?

Congested or unsafe locations. There are already significant safety concerns on the A46, which are well documented. The A46 is a strategic route and was closed in both directions on 13 August 2026 because of the Salford Priors fire, which shows how quickly traffic is diverted onto local roads around Alcester when it closes. The A435 is the main route that runs to the west of Alcester and is also a very fast highway. These two roads are likely to be the main routes locally to Alcester for the AVSF construction traffic.

The consultation material shows only indicative access. We cannot tell which public roads would be used by construction traffic, where the temporary haul roads and compounds would be, or where the permanent access points would be on each site. We have provided a list of additional information we require in Table B below, and there are a number of transport and access issues included in this list.

Furthermore, by their nature, rural lanes are generally inappropriate for HGV access, and it is vital that deliveries and other construction traffic does not adversely impact such country lanes. We support the local parishes' comments on local lanes.

Are there any sensitive areas that we should seek to direct construction traffic away from?

Construction traffic should be kept out of Alcester town centre, residential streets and narrow rural lanes. We ask for a binding Construction Traffic Management Plan with defined HGV routes, delivery time limits, wheel washing, monitoring and a named contact for complaints, considering the combined effect of construction traffic from other schemes and developments (for example, the South Warwickshire Local Plan proposes a development of over 2,500 dwellings in Bidford and Broom, which starts at the opposite end of the High Street in Broom to where the main centre of AVSF's Site 2 is proposed).

There is a significant lack of reference to the impact on schools (including nursery and early-years provision) in any of the consultation documentation. We request the Applicant identifies all schools within the relevant sites and along every proposed construction traffic route. These may be affected by HGV movements, road safety risks, noise, dust and disruption during school drop-off and collection times. We further request:

- *A mapped schedule of schools and early-years settings* within an appropriate distance of each solar site, cable corridor, proposed access point, construction compound and construction traffic route.
- *Construction traffic assessments covering school travel periods*, including HGV numbers, delivery schedules, pedestrian crossings, bus routes and the potential for conflict with children walking or cycling.
- *Assessments of noise, dust and air quality* at schools close to construction activities and haulage routes.
- *A construction traffic management plan* that identifies measures to avoid or minimise disruption during school drop-off and collection times, together with appropriate monitoring and contingency arrangements.
- *Further consultation with affected schools and education authorities* once the access points and construction routes have been finalised.

Do you have any additional comments on the Interim Environmental Report, or any environmental topics in our consultation brochure?

The IER presents preliminary findings, and the Council reserves its position on its adequacy until the full Environmental Statement is available. In its current form it does not give enough information for us to comment meaningfully on several matters. We have listed these in Table B below and ask the Applicant to respond to each item in its Consultation Report. We also ask that any information first provided after this consultation is the subject of further consultation.

We ask that the Environmental Statement:

- assesses cumulative effects with other consented and proposed schemes;

- assesses the loss of agricultural land with the grading of that land published;
- considers noise from the BESS cooling equipment and substations;
- considers the source of the required water supply for the BESS and whether there is sufficient capacity in close enough proximity to all proposed BESS sites across the project's route;
- assesses flood risk and drainage strategy including runoff from panels, for each of the individual sites, and an assessment of the effect on the River Arrow; and
- sets out decommissioning arrangements with financial security so that the land is restored if the operator fails during the 60-year life cycle of AVSF.

We also note that the full IER is only available on paper at a fixed charge of £750. This is a barrier to transparency, accessibility and public participation, and we ask that paper copies are made available on request at no charge, or for a nominal fee, and that libraries and parish councils receive a printed set.

We reiterate that this lack of completeness of information prevents Alcester Town Council from meaningfully commenting on the final proposals because key elements of the scheme that could have significant environmental, transport, highway safety and community impacts have not yet been determined.

Further consultation is therefore essential to ensure that the public, local communities and statutory consultees have a meaningful opportunity to review and comment on the complete proposals, rather than being asked to respond to an incomplete or evolving scheme.

WORKING WITH THE LOCAL COMMUNITY

On-site initiatives

We are keen to understand whether there are any on-site community benefits that we could provide as part of our proposals. Examples could include new permissive paths, upgrades to existing rights of way, educational boards or enhancement or creation of new habitats, including along the River Arrow.

We have already included a provisional permissive path on Site 2 to link the existing Public Rights of Way network to the proposed Two Shires Greenway link towards Stratford-upon-Avon.

As part of our proposals, what other initiatives should we consider?

We would like to see:

- permissive paths secured for the long term (see Site 2) and added to the Definitive Map;
- upgraded existing rights of way, including surfacing and accessibility improvements;
- habitat creation and flood-storage benefits along the River Arrow;
- interpretation boards, including on the historic landscape; and
- access for local schools and nature groups.

Any initiative should be in addition to, and not in place of, required mitigation.

COMMUNITY BENEFIT FUND

We believe that the communities closest to Arrow Valley Solar should share the benefits of the Scheme. We are therefore proposing to create the Arrow Valley Community Benefit Fund, which will provide funding each year the Scheme is in operation, based on its total capacity. The Fund could be used to support local initiatives like those listed in Chapter 7 of our Consultation Brochure.

Do you have any specific ideas for projects, groups or initiatives that could benefit from funding via the Arrow Valley Solar Community Benefit Fund?

We welcome the principle of a community benefit fund but ask that:

- the fund is independently administered with transparent decision-making and local representation, including parish and town councils;
- its geographic scope reflects the area affected by construction traffic, landscape change and loss of amenity, which extends beyond the host parishes to neighbouring towns such as Alcester;
- applications are dealt with in a timely manner;
- the grants are published; and
- the fund is clearly separate from planning mitigation.
- Some project ideas for inclusion:
 - Creation of X miles of surfaced cycle track in line with the [Two Shires Greenway](#) Project. Any proposals should be secured through the Development Consent Order or a legal agreement and added to the Definitive Map to avoid a situation where permissive paths are open to withdrawal. We would also like the Applicant to consider whether a link to Alcester is feasible.
 - Climate mitigation measures, for example, solar panels on the roof of local community buildings such as the Eric Payne Community Centre or the Greig Hall in Alcester or areas of shade created in public open spaces.
 - Support for the development of community assets such as Orchard House in Alcester. This is currently vacant and is in a poor condition, requiring significant investment and upgrading to bring it up to the standards required for a community day care facility for people in Alcester and the surrounding area living with Dementia.
 - Support for the redevelopment of the former Library in Alcester as a day care centre for adults with learning disabilities.

GENERAL

Do you have any final comments on our proposals?

Fire Risk:

Alcester Town Council is seriously concerned about the risk of fire. On Thursday 13 August 2026 a major incident was declared after a fire started in a field at Tothall Lane, Salford Priors. The A46 was closed in both directions between Arrow Services and Salford Bridge and residents were told to keep windows and doors shut. ([Salford Priors fire: Emergency services update on blaze - The Stratford Observer](#)). This fire shows that the area is exposed to wildfire in dry summers, that the effects reach the strategic road network and nearby homes and schools, and that those risks would increase where land is covered with electrical equipment and battery storage. We further note that the location of this recent fire is in very close proximity to both Options A&B for the Site 2 400kv substation.

We ask the Applicant to publish, before the application is submitted, a fire risk assessment and outline fire safety management plan covering:

- (a) Wildfire. Risk of heatwaves - dry grass, crops, hedgerows and woodland edges, vegetation management under and around panels, firebreaks and grazing, and an explicit account of the 13 August 2026 incident and how the design responds to it.
- (b) Access and water. Multiple access points and internal tracks suitable for fire appliances, turning space, gates, and on-site firefighting water supplies. The consultation material does not say where these would be and we are particularly

concerned about the rural and remote locations of some of the sites which might be difficult for the Fire Services to access.

(c) Electrical equipment. Solar arrays can remain live in daylight, which complicates firefighting, so isolation procedures and the location of inverters, transformers and substations must be shown.

(d) Battery storage. Location, capacity and layout of the BESS; separation distances from homes, roads and watercourses; the risk of thermal runaway; modelling of smoke and toxic plumes in relation to nearby homes, the A46 and Alcester; and the containment of contaminated firewater so that it cannot reach the River Arrow. We ask that the Applicant follows the National Fire Chiefs Council guidance on grid-scale battery storage.

(e) Emergency response. An emergency plan agreed with Warwickshire Fire and Rescue Service and, for sites in Worcestershire, Hereford and Worcester Fire and Rescue Service, and with National Highways and the highway authorities for the closure of the A46 and other roads.

We ask that the agreed measures are secured by requirements in the Development Consent Order, that the plan is reviewed with the fire services at regular intervals during operation, and that evidence of the fire services' agreement is published with the application.

Information needed from the Applicant:

Alcester Town Council cannot respond meaningfully on the matters below because the Consultation material is either not available, vague or inconsistent. We ask the Applicant to provide the following information in Table B below; to respond to each item in its Consultation Report; and to consult again where new material is published.

No.	Topic	What is missing or unclear	What we ask for
B1	Scale	The Section 48 Notice gives only 'over 100MW (AC)', with no upper limit. No figures are provided for storage capacity or land area - which has changed since the Scoping Report due to inclusion of additional land at Site 1(f)). The final site boundary and cable corridor therefore differs from the earlier figures.	Intended and maximum generating and storage capacity (MW and MWh), total land area and grid connection offer.
B2	Construction access routes	Access routes are vague. The S48 Notice refers to temporary haul roads, construction compounds and permanent access points but is unclear on locations.	Maps of every access point, haul road and compound, the public roads to be used, expected vehicle numbers, working hours, programme and duration for each site.
B3	Pipelines	Routes are vague. The S48 Notice does not mention pipelines.	The purpose of each pipeline, its route, diameter and depth, construction method, whether it is inside the cable corridor, and who would own it.

No.	Topic	What is missing or unclear	What we ask for
B4	Cable route corridor	The corridor is wide, with two options between Sites 2 and 3 and routing options at Cleeve Prior and Feckenham.	Corridor and easement widths, a preferred route and the reasons, and how crossings of roads, the A46, the River Arrow, rail and rights of way will be made.
B5	Site 2 substation	Two options (A and B) with no comparison.	A published comparison covering visual effect, noise, flood risk, heritage and distance from homes and local schools.
B6	BESS	Type, size and layout are not given beyond a location on Site 1.	Chemistry, capacity, number and size of enclosures, separation distances, noise and fire modelling, and firewater containment.
B7	Fire	No fire risk assessment or fire strategy has been seen, and no account taken of the 13 August 2026 fire.	A fire risk assessment and outline fire safety management plan, agreed with the fire and rescue services and National Highways.
B8	Heritage	No assessment of effects on designated assets (IER 9.6.18 and Table 9-6), including Ragley Hall.	The items in listed in Table A relating to observations on Chapter 9, IER.
B9	Landscape and visual	Viewpoints, zones of visibility, photomontages and planting plans have not been seen. A Lighting Strategy and screening are mentioned as mitigation (IER 9.6.20).	Chapter 10 and its figures, viewpoints - agreed with the parishes, planting plans with species and heights, and the Lighting Strategy.
B10	Traffic and cumulative effects	No construction traffic figures or cumulative assessment have been seen.	Vehicle movements by phase and route, HGV routing, and a cumulative assessment with other schemes.
B11	Flood risk and drainage	No drainage strategy or flood risk assessment has been seen for sites near the River Arrow (Section 48 Notice refers to 'drainage infrastructure').	A flood risk assessment and drainage strategy including runoff from panels, for each of the individual sites, and assessment of the effect on the River Arrow.
B12	Agricultural land	Land grades and areas of best and most versatile land are not given. Productive land is needed for food security – which is part of National Security exemptions in other areas – and should be prioritised.	Agricultural Land Classification Survey with a grade for each parcel, area affected and the soil management plan.

No.	Topic	What is missing or unclear	What we ask for
B13	Noise	No noise modelling has been seen for the BESS, inverters and substations.	Noise modelling at the nearest homes and schools for construction and operation.
B14	Rights of way	Buffer widths, diversions and temporary closures are not provided.	Proposed buffer widths, a schedule of every affected right of way and the measures for each.
B15	Decommissioning	Outline Decommissioning Plan not seen. Cables to Feckenham to be left in situ (IER Table 9-1).	The plan, a timescale, what is left in the ground, and financial security, particularly if Island Green Power enters administration during the life cycle of the solar farm. What are the triggers for the decommissioning fund?
B16	Community Benefit Fund	The amount, the governance and the area covered are not stated.	The amount per MW, administration, geographic scope and how projects are chosen.
B17	Alternatives	The reasons for four sites and 18 or more sub-sites are not clear (S 48 Notice; IER refers to Chapter 4).	Chapter 4 (Consideration of alternatives) and the site selection evidence.
B18	Documents referred to but not seen	Chapter 9 relies on Chapters 2, 4 and 10, Volume 2 figures, Volume 3 Appendices 9.2 to 9.4 and outline plans (oCEMP, LEMP, oOEMP, oDEMP, oAMS).	Confirm which are in the consultation document library and publish any that are not.
B19	Sub-site labelling	The S48 Notice says Site 2 has five sub-sites, but the Notice and plans show 2(a) to 2(d) only. IER Table 9-6 refers to 'sub-Site 2(e)'.	A corrected plan showing every sub-site, with consistent labelling.

Final comments:

Alcester Town Council recognizes the need for clean, home-grown energy and does not oppose renewable energy in principle. Our concerns are about the scale of this scheme and where it is proposed. We are seeking evidence that a scheme spread over four sites and 18 or more sub-sites with long cable routes is the least harmful way to achieve its aims.

We ask that the Applicant responds publicly to the issues raised here, that any significant design change is subject to further consultation and that Alcester Town Council is kept informed as an interested neighbouring body. We reserve the rights to make further representations, including an examination if an application is accepted.

We stand with the parishes closest to the scheme and support the representations they make.

Official response made by Alcester Town Council 22 October 2026