EN0110033

Programme Document

Document Reference : AVS-ATR-GEN-XX-TN-LP-000001

September 2026

Arrow Valley Solar Limited
Rev 2.0

Document Revision Page

Document Version	Date	Status	Author	Check	Approve
Rev 1.0	February 2026	Issue for PINS Inception Meeting	HH	KH	VD
Rev 2.0	September 2026	Issue for PINS Project Update Meeting	KH/ HH	GB	JG

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1 Introduction

1.1 Overview and purpose of the document

1.1.1 This Programme Document has been prepared on behalf of Arrow Valley Solar Limited (the 'Applicant') for Arrow Valley Solar (hereafter referred to as the 'Project') and issued pursuant to the Planning Inspectorate's Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus[1] published in May 2024 (and most recently updated in July 2026).

1.1.2 The Prospectus requests applicants to provide a pre-application Programme Document setting out the main steps that applicants anticipate taking during the preparation of its Development Consent Order (DCO) application. Whilst not a statutory requirement, it sets out the timetable and activities necessary for an effective pre-application process.

1.1.3 This Programme Document is intended to remain a live document during the pre-application period to reflect the evolution of the Project and its programme.

1.2 Programme Document Structure

1.2.1 This document is structured as follows:

- Section 2: Background to the Project;
- Section 3: The Planning Inspectorate's Pre-Application Service;
- Section 4: The Pre-Application Programme;
- Section 5: Main Issues for Resolution;
- Section 6: Engaging with Statutory Bodies;
- Section 7: Engaging with Local Authorities; and
- Section 8: Pre-Application Risks.

[1] Planning Inspectorate (2024). *Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus*. [online] GOV.UK. Available at: https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-2024-pre-application-prospectus.

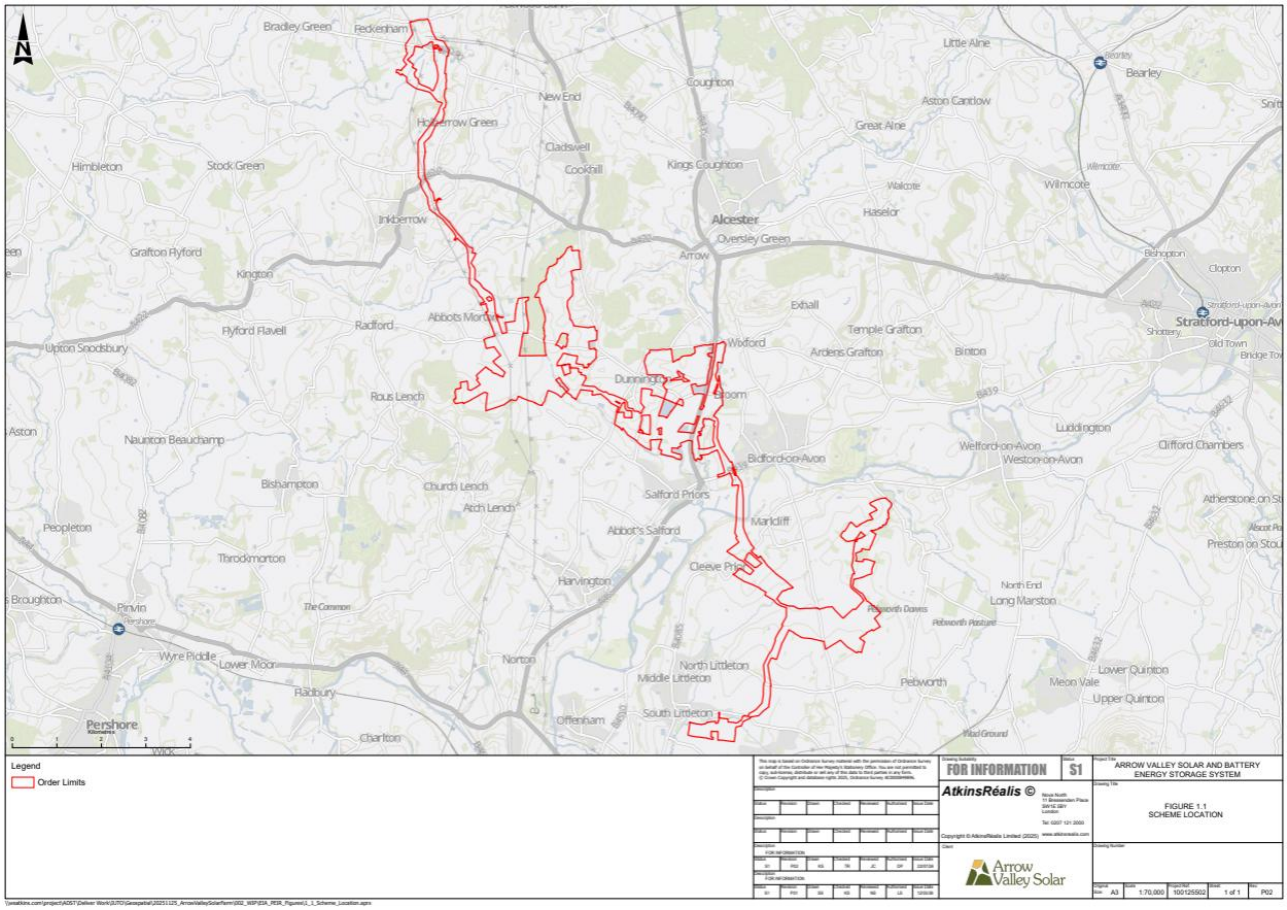
2 Background to the Project

2.1 The Project

2.1.1 The Project consists of the construction and operation of an electricity generating station with associated battery energy storage, substations, ancillary infrastructure and grid connection infrastructure connecting into the National Electricity Transmission System (NETS). The Scheme would enable the generation and export of greater than 100 megawatts (MW) alternating current (AC) of renewable energy.

2.1.2 The draft Order Limits cover approximately 1762 ha of land across Warwickshire and Worcestershire, within Stratford-on-Avon, Redditch and Wychavon. The National Grid point of connection is at the Feckenham 400kV substation, which is located approximately 8km from the nearest solar array site. The Scheme Location is shown in Figure 2-1.

Figure 2-1 Scheme Location



2.1.3 The draft Order Limits have been refined since the submission of the EIA Scoping Report, in light of environmental survey information and engineering requirements. Further information on design approach is set out in Section 4.8.

2.1.4 Further details regarding the project will be available on the project website (https://arrowvalleysolar.co.uk/) as the Project development progresses.

2.2 The Applicant

2.2.1 The Project is being promoted by Arrow Valley Solar Limited (the 'Applicant'), a Special Purpose Vehicle owned by Island Green Power Limited (IGP).

2.2.2 IGP is a leading developer of renewable energy projects, established in 2013. IGP has successfully delivered nearly 40 projects worldwide that have generated more than 3 GW of energy capacity. This includes 21 solar and storage projects in the UK. Its projects include the consented NSIPs Cottam Solar Project and West Burton Solar Project, located in Lincolnshire.

2.2.3 IGP's mission is to be the leading innovator in sustainable, clean energy development by pioneering solutions that facilitate the energy transition and conserve the planet's ecosystems.

2.3 The Planning Act 2008

2.3.1 The Project consists of the construction and operation of an electricity generating station with a capacity in excess of 100 megawatts (MW) and is classified as an NSIP in the field of energy generation under section 14 of the Planning Act 2008 (PA2008), as amended by the Infrastructure Planning (Onshore Wind and Solar Generation) Order 2025. As such, the Project requires development consent from the Secretary of State for Energy Security and Net Zero in order to proceed.

2.4 Other Consents and Licenses

2.4.1 Additional consents, licences and permits may be required for the Project. Given that the Project is at the early stages of pre-application engagement, the Other Consents and Licences Strategy is evolving. Further detail on this strategy will be provided in the subsequent updates of this Programme Document.

2.5 Policy Context

2.5.1 The primary basis for decision making for the Project will be the National Policy Statement for Energy (EN-1) (2025), National Policy Statement for Renewable Energy Infrastructure (EN-3) (2025), and the National Policy Statement for Electricity Networks Infrastructure (EN-5) (2025) which came into force on the 6 January 2026.

2.5.2 Other matters of relevance in the determination of the Project will include (but not be limited to) other national policy documents such as the National Planning Policy Framework (NPP4) (2026) and the National Design Guide (2021), as well as the host authorities local development plan policies and other documents in the local development framework. The Applicant will also have due regard to the Government's National Infrastructure Planning Guidance and the NSIP Advice Notes published by the Planning Inspectorate, including Advice on Good Design.

2.5.3 The Project is located within the administrative boundary of three Local Planning Authorities (LPAs): Redditch Borough Council, Stratford-on-Avon District Council and Wychavon District Council, and two County Councils: Warwickshire County Council and Worcestershire County Council.

3 The Planning Inspectorate's Pre-Application Service

3.1 Pre-Application Service Tier

3.1.1 The Applicant has selected the Tier 1: The Basic Service[1], based on the following considerations:

- The Applicant has significant experience of preparing and submitting solar DCO applications;
- The Project is considered to be of a low complexity with the majority of issues likely to be raised at examination being common considerations of Examining Authorities;
- There are up-to-date relevant national policy statements in place, namely NPS for energy (EN-1), NPS for renewable energy (EN-3) and NPS for electricity networks infrastructure (EN-5), in force as of 6 January 2026; and
- A Basic tier would be consistent with the predicted levels of engagement with PINS based on similar NSIPs within the solar energy sector.

3.2 Fast-Track and Supplementary Components Service

3.2.1 The Applicant is not seeking a fast-track procedure.

3.2.2 The Applicant will not use the supplementary components service as this is not included within the Basic Tier.

4 Pre-Application Programme

4.1 Overview

4.1.1 This section summarises the activities that have taken place to date and the activities planned before the submission of the DCO Application. It will be updated as further pre-application engagement takes place.

4.2 Planned Submission Date

4.2.1 The planned submission date for the DCO Application is April 2027.

4.3 Programme of activities relating to pre-application engagement with PINS

4.3.1 The pre-application engagement with the Planning Inspectorate (PINS) is planned to include the programme of key dates set out in Table 4-1 below.

Table 4-1 Pre-application engagement with PINS

Key Date	Meeting/Information Shared
24 February 2026	PINS Project Inception Meeting
27 March 2026	EIA Scoping Report Submission
7 May 2026	EIA Scoping Opinion
16 September 2026	PINS Project Update Meeting – Pre-Consultation
28 September 2026 to 2 November 2026	Formal Public Consultation
Q1 2027	PINS Project Update Meeting – Pre-Submission
April 2027	DCO Submission

4.4 Programme of activities relating to engagement with Statutory Bodies

4.4.1 The ongoing and planned engagement with statutory bodies is set out in Section 6 (Engaging with Statutory Bodies) and Section 7 (Engaging with Local Authorities) of this Programme Document.

4.5 Programme of activities relating to planned consultations

4.5.1 The planned programme of consultation activities is set out in Table 4-2.

Table 4-2 Consultation programme

Date	Activity
December 2025 to April 2027	Ongoing engagement with stakeholders prior to application submission

Date	Activity
4 to 21 August 2026	Engagement with Host Authorities on Consultation Strategy
28 September 2026 to 2 November 2026	Formal Public Consultation

4.5.2 Amendments to the PA2008 were proposed via Part 1, Chapter 1, Section 5 of the Planning and Infrastructure Act (2025) (PIA2025). These amendments came into effect on 24 July 2026.

4.5.3 The following sections of the PA2008 have been removed:

(a) section 42 (duty to consult);

(b) section 43 (local authorities for purposes of section 42(1)(b));

(c) section 44 (categories for purposes of section 42(1)(d));

(d) section 45 (timetable for consultation under section 42);

(e) section 47 (duty to consult local community); and

(f) section 49 (duty to take account of responses to consultation and publicity).

4.5.4 The requirement to publicise the proposed application under section 48 remains in force. Copies of the Section 48 notice will be issued to all relevant consultation bodies, as required under section 13 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.

4.5.5 The Planning Inspectorate published updated guidance notes to reflect the changes enacted by the PIA2025, including *Planning Act 2008: Guidance on preparing an application: Part 1- Pre-application steps*[2] which sets out guidance related to engagement and consultation for NSIPs.

4.5.6 In view of the changes made to pre-application consultation requirements, the Applicant is pursuing the following pre-application engagement activities:

- Ongoing stakeholder engagement activities with statutory bodies and other necessary parties throughout the pre-application stage (see Sections 6 and 7 for further information);

[2] Planning Inspectorate (2026). *Planning Act 2008: Guidance on preparing an application: Part 1 - Pre-application steps*. [online] GOV.UK. Available at: https://www.gov.uk/guidance/planning-act-2008-guidance-on-preparing-an-application-part-1-pre-application-steps#pre-applicationengagement-andconsultation

- Engagement with host authorities on the Consultation Strategy, which sets out the principles of and logistics for the formal consultation;
- A 5-week formal consultation to take place from 28 September to 2 November 2026. The community consultation will comprise a range of in-person and online events. A Consultation Brochure will be provided, which will summarise the Project proposals and environmental information available to date, alongside targeted feedback questions for the community aimed at encouraging the local community to meaningfully engage with the proposals and shape the design of the Project. An Interim Environmental Report will also be made available for review (see Section 4.7).

4.5.7 The proposed consultation approach is considered to be proportionate to the Project and aims to obtain meaningful feedback from stakeholders and the local community which can be incorporated into the Project's development. The proposed consultation strategy has been developed with regard to the Gunning Principles.

4.6 Programme of activities relating to key application documents (including the DCO)

4.6.1 DCO application documents will be prepared between May 2026 and April 2027.

4.6.2 The Applicant has commenced drafting of the Environmental Statement and will be consulting on an interim version (titled the "Interim Environmental Report") during the public consultation launching in September 2026.

4.6.3 The planned submission date of the DCO Application is April 2027.

4.7 Programme of activities relating to Environmental Impact Assessment

4.7.1 The planned programme of activities relating to Environmental Impact Assessment (EIA) is set out in Table 4-3.

Table 4-3 EIA programme

Date	Activity
Q1 2026	Prepare EIA Scoping Report (Complete)
27 March 2026	Submit EIA Scoping Report (Complete)
7 May 2026	Receive EIA Scoping Opinion (Complete)
May 2026 to September 2026	Prepare Interim Environmental Report (IER)

Date	Activity
September 2026 to April 2027	Prepare Environmental Statement (ES)
April 2027	DCO Submission, including ES

4.7.2 Following changes made to the PA2008 under the PIA2025, Applicants are no longer required to consult on a Preliminary Environmental Information Report (PEIR). However, guidance notes published by PINS encourages iterative sharing of relevant environmental information with statutory bodies for discussion and feedback during the pre-application stage.

4.7.3 The Applicant will publish an Interim Environmental Report (IER) for consultation to assist stakeholders in understanding the environmental technical work undertaken to date, and to inform their consideration of the Project.

4.7.4 As part of the formal consultation, all stakeholders are invited to provide their views on the IER, which comprises the introductory chapters of the Environmental Statement (ES) that will be submitted in support of the DCO application:

- Chapter 1: Introduction;
- Chapter 2: Project description;
- Chapter 3: Site and surrounding environment;
- Chapter 4: Consideration of alternatives; and
- Chapter 5: Approach to the assessment.

4.7.5 The IER will also include the initial sections of each environmental topic chapter that will comprise the ES:

- Chapter 6: Ground conditions
- Chapter 7: Soils and agriculture
- Chapter 8: Biodiversity
- Chapter 9: Historic environment
- Chapter 10: Landscape and visual
- Chapter 11: Climate Change
- Chapter 12: Transport and access
- Chapter 13: Noise and vibration
- Chapter 14: Glint and glare
- Chapter 15: Population and human health;
- Chapter 16: Water environment;
- Chapter 17: Materials and waste;
- Chapter 18: Air quality;
- Chapter 19: Other matters; and
- Chapter 20: Cumulative effects.

4.7.6 Within the IER, topic chapters, the following sections will be provided:

- Scope of the assessment;
- Consultation;
- Legislation and policy;
- Method of assessment; and
- Baseline conditions.

4.7.7 Also provided within the IER and its figures and appendices will be details of embedded mitigation, results of surveys where available, and other information of relevance to stakeholders including photomontages.

4.7.8 The IER will not include environmental assessment or conclusions on likely significant effects. Assessments will progress throughout the year to inform revisions to Project design and necessary mitigation measures. Results of technical assessments will be shared with statutory bodies and host authorities for review, comment and discussion prior to application submission, as part of ongoing engagement.

4.7.9 The following environmental surveys have been completed for the project to date:

- Agricultural Land Classification Surveys (concluded February 2026);
- Geophysical surveys for buried archaeology on solar sites (concluded July 2026);
- Landscape summer surveys (concluded August 2026);
- Baseline noise surveys (concluded July 2026);
- Traffic monitoring surveys (concluded July 2026);
- Bat roost assessments and ground-level tree assessments (concluded July 2026);
- Breeding bird surveys (concluded July 2026);
- Great crested newt eDNA surveys (concluded July 2026);

4.7.10 The following environmental surveys are currently ongoing or are to be commenced and completed during the remainder of the pre-application stage:

- EA UK Habitat Classification survey and protected species assessment;
- Static bat monitoring surveys;
- Water vole and otter surveys;
- Wintering bird surveys (January and February completed, further surveys scheduled for November and December 2026)
- MoRPH surveys (including eDNA for fish and white-clawed crayfish surveys).

- Built heritage walkovers;
- Geophysical surveys for buried archaeology on cable route corridor;
- Multi-spectral surveys for buried archaeology; and
- Winter landscape surveys.

4.8 Programme of activities relating to the design approach

4.8.1 The design development of the Project is following a staged process, with a series of design fixes which provide a draft version of the Order Limits, project parameters and associated masterplan for technical assessment. The design fixes will be informed by project-specific requirements, environmental assessments and considerations, and feedback from stakeholders and communities.

4.8.2 The first design fix was undertaken in January 2026, which provided the draft Order Limits for EIA Scoping.

4.8.3 A further design fix took place in May 2026, to refine the draft Order Limits and to provide a set of parameters, including the 'developable area' within the draft Order Limits. This was identified through engagement with technical specialists and informed by survey work to date, resulting in the identification of areas suitable for the proposed siting of infrastructure, ensuring suitable setback from sensitive receptors.

4.8.4 Further amendments to the May 2026 design fix took place in July 2026, which further took account of environmental surveys and advice of technical specialists. This design will be subject to public consultation.

4.8.5 A further design fix is programmed for December 2026 which will provide the final version of the Order Limits and project design, including the overall masterplan, works plan, maximum parameters and Rochdale Envelope. This will be presented and assessed in the DCO application including the Environmental Statement.

4.9 Programme of activities relating to Assembly of the Order Lands

4.9.1 Option for Lease Agreements have been entered into with landowners for the PV, BESS and Substation sites.

4.9.2 Initial contact with potentially impacted parties along the Cable Route Corridor was made in March 2026. Engagement has been ongoing with landowners, occupiers and agents. All parties will be notified of public consultation dates, process and event timings, and two landowner events

will be held exclusively for parties potentially impacted by the Cable Route.

4.9.3 Non-intrusive surveys across the PV and BESS sites and Cable Route Corridor are currently being undertaken and are anticipated to extend until the end of 2026.

4.9.4 Heads of Terms for Options for Easements are currently programmed to be issued to landowners in Q1 of 2027, following the final design fix and confirmation of Order Limits and Works Plan.

4.9.5 The Applicant's intention is for the DCO to afford compulsory acquisition rights across the entire Order Limits. These would be used in the event that voluntary agreement cannot be reached or exercised.

4.10 Programme of activities associated with the preparation of a Report to inform a Habitats Regulations Assessment (HRA) and Evidence Plan

4.10.1 HRA screening is currently underway, following identification of potential functional linkage between River Avon and Severn Estuary Special Area of Conservation (SAC) through migratory fish populations.

4.11 Programme of activities related to Other Consents and Licenses

4.11.1 Given that the Project is at an early stage, the Other Consents and Licenses Strategy is evolving. Further detail on this Strategy will be provided in the subsequent updates of this Programme Document.

5 Main Issues for Resolution

5.1 Overview

5.1.1 This section sets out the main issues identified by the Applicant during the pre-application stage, including the activities that will be undertaken to address those issues.

5.1.2 The Applicant is continuing to engage with statutory bodies and key stakeholders on technical matters, however at this current stage the Project has not yet published a revised set of Order Limits or project design information since the Scoping stage, nor has the public consultation period commenced. It is therefore anticipated that the list of main issues for resolution will develop following consultation and throughout the pre-application programme, and will be included in subsequent updates of this Programme Document.

5.1.3 The issues tracking process will feed into the Statements of Common Ground developed with each stakeholder. It will also culminate in a list of Potential Main Issues for Examination (PMIE) which will be submitted with the DCO application.

5.1.4 Following engagement with statutory bodies, host authorities and other stakeholders, alongside technical assessments progressed by the Applicant to date, it is considered that the items listed in Table 5-1below are the main issues for resolution.

Table 5-1 Main Issues for Resolution

Topic	Description of Issue	Management of Issue
Design	The potential size of the Scheme and Cable Route Corridor (CRC) crossings	The design process has been informed by project level design principles, environmental surveys, input from technical specialists, and stakeholder discussions. The design process is environmentally led, considering environmental constraints and opportunities, the local landscape context, and communities. Consideration has been given to buffer zones around sensitive environmental features and residential properties, where necessary. As the design has progressed, mitigation and enhancement measures are being embedded into the design.

Topic	Description of Issue	Management of Issue
		Following closure of public consultation in November 2026, and ongoing engagement with stakeholders, the design and scale of the project will evolve with a view to adopting a "design fix" that will be the subject of the DCO application and assessment in the Environmental Impact Assessment. The CRC will be approximately 50m in width (subject to any variations in width, where required to address technical or environmental constraints). The CRC and cable route has been subject to an iterative design process informed by ongoing surveys, appraisals, and engagement with landowners.
Ecology and Biodiversity	Potential impacts on ecological receptors, including protected species and designated sites.	The Applicant has completed a number of environmental surveys, with further surveys being carried out during the remainder of the pre-application stage. Details on completed and proposed surveys are outlined in Section 4.7. The results of the surveys will inform the assessment and the evolving design of the Scheme as it is continually developed. The Scheme will deliver at least 10% biodiversity net gain (BNG), and engagement with relevant stakeholders on the proposed BNG strategy will take place prior to application submission. The Applicant has commenced regular engagement with Natural England regarding the approach to surveys and ecological assessment, and has adapted its approach based on NE advice. To date, this has included early sight of survey reports and technical notes outlining the approach to assessment of species. Engagement with Natural England will continue throughout the pre-application stage. Additionally, the Applicant has engaged with Warwickshire and Worcestershire Wildlife Trusts, and will also take account of any feedback received from ecology officers at the host authorities.

Topic	Description of Issue	Management of Issue
		The Applicant is undertaking HRA screening to determine whether the Scheme is likely to have a significant effect on the Severn Estuary Special Area of Conservation (SAC) and Ramsar due to its functional link with the River Avon. The DCO Application will include management plans, such as an Outline Ecological Protection and Mitigation Strategy, Outline Landscape and Ecological Management Plan and Outline Construction Environmental Management Plan that will set out measures to avoid and mitigate disturbance as far as practicable.
Historic Environment	Agreement of archaeological mitigation and potential impacts on the setting of nearby heritage assets.	A Desk Based Assessment (DBA) has been shared with heritage officers at County Archaeologists at the host authorities, and Historic England. The Applicant will address comments from these parties accordingly. Engagement with these parties will continue throughout the pre-application period. Geophysical surveys have been undertaken on the solar sites and analysis is ongoing. Further multispectral surveys will be undertaken on the solar sites, and geophysical surveys will also be carried out on the cable route corridor. This approach has been developed having regard to the recently published Archaeology and Solar Farms Good Practice Guide jointly prepared by Historic England, ALGAO, CIfA, FAME and Solar Energy UK. The approach reflects the guidance's emphasis on proportionate, risk-based evaluation and focused investigation of areas where archaeological impacts may arise, rather than extensive trenching across all areas of a solar development site.
Landscape and Visual	Potential impacts on landscape character, visual impact of infrastructure on the surrounding landscape. Adequacy of landscape mitigation	Project level design principles will help deliver good design, responding to the local landscape character. Existing vegetation will be retained and enhanced, where practicable. Given the Scheme's location in a rural area, the design process has considered the potential effects of infrastructure on viewpoints. As part of

Topic	Description of Issue	Management of Issue
		the design, appropriate mitigation measures have been developed such as screening of Scheme components. The Applicant has engaged with landscape officers at the host authorities to agree landscape viewpoints for assessment in the Environmental Statement. This engagement will continue throughout the pre-application stage. The Applicant will also engage with the Cotswold National Landscape Board at the launch of the public consultation to invite comment on the proposals. A draft landscape masterplan will be made available at the public consultation for comment on by stakeholders and the local community. The DCO Application will include a landscape masterplan and relevant management plans, such as an Outline Landscape and Ecological Management Plan. These plans will include measures for screening and landscape enhancements, incorporating opportunities to connect green infrastructure.
Transport and Access	Potential impacts of construction vehicle routeing on the local and strategic road network.	The Applicant is seeking to commence engagement with the local highways authorities regarding the construction access proposals and will ensure that feedback collected is reflected in the final design of the scheme. Furthermore, the Applicant is seeking to commence engagement with National Highways to identify and address any potential key concerns regarding the strategic road network. An Outline Construction Traffic Management Plan will be included in the DCO Application.
Aviation	Potential impacts on aviation receptors associated with Bidford Gliding and Flying Club.	The Applicant will include a glint and glare assessment in the Environmental Statement, which will assess likely impacts aviation receptors (as well as on road users and residential amenity). The Applicant has commenced engagement with Bidford Gliding and Flying Club to understand the

Topic	Description of Issue	Management of Issue
		key potential issues. This engagement will continue throughout the pre-application stage. The Applicant will also write directly to the Civil Aviation Authority at the launch of the public consultation to invite comment on the proposals.

5.1.5 The Applicant will continue to engage with stakeholders on these issues and will await further feedback resulting from the forthcoming public consultation. Further information regarding pre-application risks is outlined in Table 8-1 of this document.

6 Engaging with Statutory Bodies

6.1 Overview

6.1.1 This section sets out the Applicant's proposals for pre-application engagement and consultation with statutory consultees during the pre-application stage.

6.1.2 Initial engagement with a number of stakeholders commenced in late 2025/ early 2026, targeted towards host authorities, Natural England, Historic England and the Environment Agency. This early engagement has since continued, resulting in regular meetings with these parties to discuss technical matters.

6.1.3 The Applicant will continue to engage with stakeholders, landowners and the local community throughout the pre-application stage. Whilst the consultation requirements for NSIPs have changed, and as such a number of consultees are no longer 'prescribed', engagement has to date involved the following bodies:

- Environment Agency;
- Natural England;
- Historic England;
- National Highways;
- Host local authorities;
- Host Parish Councils;
- Bidford Flying and Gliding Club;
- Two Shires Greenway;
- Relevant Statutory Undertakers; and
- Persons with an interest in land.

6.1.4 As set out in Section 4.5, the Applicant will be hosting a 5-week public consultation which, in addition to those stakeholders listed above, will seek the view of the following groups within the local community:

- Local residents;
- Environmental groups;
- Elected representatives; and
- Community groups.

6.1.5 At consultation launch, the Applicant will issue courtesy notification letters to relevant stakeholder parties at consultation launch, which will include signposting towards relevant consultation documents and, in some cases, specific queries that the Applicant requests views on. This approach is intended to secure clear and focused feedback, enabling the Applicant to identify and resolve outstanding issues prior to Examination where possible.

6.1.6 The Applicant is not yet aware of which statutory bodies are likely to produce pre-application 'principal areas of disagreement summary statements'. The Applicant will seek to resolve as many issues as possible prior to submission of the application, and has begun drafting Statements of Common Ground with key stakeholders to assist in seeking agreement on matters of interest. The Applicant will update this Programme Document as engagement continues.

7 Engaging with Local Authorities

7.1 Overview

7.1.1 This section sets out the Applicant's proposals for pre-application consultation with host authorities during the pre-application stage.

7.1.2 Engagement with the host authorities on the Project has been ongoing since late 2025. The Applicant will continue this engagement through the pre-application process.

7.1.3 The Applicant hosted initial Project introduction briefings with Wychavon District Council, Stratford-on-Avon District Council, Redditch Borough Council, Worcestershire County Council, and Warwickshire County Council in late 2025/ early 2026. Following this, the Applicant has established a joint host authority forum meeting on a 6-weekly basis, which provides regular project updates to planning officers representing the host authorities and provides an opportunity for officers to ask questions about the project or raise issues.

7.1.4 The Applicant has sought feedback from planning officers on a Consultation Strategy, which outlines the proposed approach to the 5-week public consultation including proposed event spaces.

7.1.5 Engagement with the host authorities on specific environmental disciplines and technical matters is carried out on an ad-hoc basis between the project's technical specialists and specialist officers, where possible. This has been done both by email and in meetings.

7.1.6 The Applicant hosted a project introductory briefing with the host Parish Councils in April 2026, followed by a further project update meeting in July 2026.

7.1.7 The Applicant is not yet aware of whether any of the host authorities are likely to produce a pre-application 'principal areas of disagreement summary statement'. The Applicant will seek to resolve as many issues as possible prior to submission of the application. The Applicant will update this Programme Document as the process continues.

7.1.8 The Applicant intends to enter into Planning Performance Agreements (PPA) with the host authorities and has issued draft versions to each of the host authorities. One host authority has declined to enter into a PPA, but the Applicant is hopeful that agreements with the other host authorities will be reached in due course.

8 Pre-Application Risks

8.1 Overview

8.1.1 Table 8-1 provides the framework for setting out potential risks identified to date by the Applicant. This table will be updated as risks are identified.

Table 8-1 Main Risks Identified by the Applicant

Topic	Key Risk Description	Mitigation/Avoidance Actions
Host Authorities	Risk of Host Authorities not engaging meaningfully or within anticipated timescales during the pre-application stage, owing to resource constraints. This could delay the identification and resolution of key planning, environmental and technical matters, reduce opportunities to progress Statements of Common Ground, and increase the likelihood of issues remaining unresolved at the point of application submission.	Continue proactive engagement through regular project meetings and technical workshops; maintain and regularly circulate draft Statements of Common Ground; seek to agree Planning Performance Agreements where appropriate to support resourcing constraints; clearly communicate key response milestones and deadlines; maintain the Issues Tracker; and ensure all reasonable opportunities for engagement are provided throughout the pre-application stage.
Principal Areas of Disagreement	Key matters raised by Host Authorities, statutory bodies and other stakeholders may not be resolved during the pre-application stage, resulting in Principal Areas of Disagreement remaining at the point of submission. Such matters may relate to environmental effects, transport, landscape and visual impacts, ecology, flood risk, construction impacts or other technical topics. This may lead to additional scrutiny during examination and increase the amount of issue	Maintain regular engagement with relevant stakeholders through technical discussions and workshops; maintain the Issues Tracker to identify and monitor matters requiring resolution; regularly prepare, circulate and update Statements of Common Ground; and seek to identify and address areas of disagreement as early as practicable.

Topic	Key Risk Description	Mitigation/Avoidance Actions
	resolution required post-submission.	
Disagreement with approach to consultation and engagement	Whilst the Applicant is proposing to undertake a programme of non-statutory public consultation, the consultation requirements previously set out under sections 42, 47 and 49 of the Planning Act 2008 no longer apply. As a result, stakeholders may raise concerns regarding the scope, format or extent of engagement undertaken by the Applicant, or consider that further opportunities for engagement should be provided.	The Applicant will undertake a proportionate and transparent programme of consultation and stakeholder engagement, guided by the Gunning Principles, providing clear information on the Scheme and opportunities for feedback. Consultation responses will be reviewed and considered as part of the iterative design process, with a design freeze implemented following the close of consultation to allow sufficient time for the consideration of feedback and any necessary design refinements. The Applicant will seek to address concerns where practicable through project design, mitigation measures and ongoing engagement, and will clearly communicate how consultation feedback has informed the evolution of the Scheme.
Design Evolution	Feedback received through consultation may identify concerns or opportunities for refinement that result in changes to the design of the Scheme, including infrastructure locations, access arrangements, cable routing, mitigation measures or Order Limits. Where significant changes are required, additional assessment, stakeholder engagement or updates to application documents may be necessary.	The Applicant will maintain an iterative design process informed by consultation feedback and ongoing stakeholder engagement. Design changes will be reviewed promptly to identify implications for environmental assessment, consultation and programme delivery. The Applicant will seek to identify and address issues at the earliest opportunity, to enable them to be included within the post-consultation design freeze, and accommodate

Topic	Key Risk Description	Mitigation/Avoidance Actions
		reasonable design refinements prior to submission. In this regard, the Applicant is carrying out consultation at an early enough stage to enable necessary design changes to be adopted before assessments are carried out in detail.
Environmental Impact Assessment Programme	The DCO is currently targeted for submission in April 2026, resulting in a relatively constrained timeframe in the pre-application stage to finalise all application documents, including the Environmental Statement. The preparation of extensive environmental information for consultation and submission during this timeframe may place significant demands on host authority and stakeholder resources for review and engagement on draft documents and key issues.	The Applicant will undertake ongoing programme management of the EIA process and maintain regular engagement with environmental consultees to identify and address issues at the earliest opportunity. To support the efficient delivery of the EIA programme, the Applicant proposes to publish an Interim Environmental Report (IER) as part of consultation. The IER will set out the environmental baseline, key constraints, assessment methodologies and proposed approach to mitigation, enabling stakeholders to provide informed feedback on the matters most commonly discussed and agreed during pre-application and examination. By focusing consultation on the baseline conditions and assessment approach, feedback can focus on shaping the Scheme, rather than commenting on assessment outcomes. The IER reduces the resource burden associated with preparing preliminary assessment results and enables consultation feedback to be provided at

Topic	Key Risk Description	Mitigation/Avoidance Actions
		an earlier stage, with information feeding into the assessments and improving the iterative design of the Scheme prior to completion of environmental assessments and preparation of the Environmental Statement for submission.

8.1.2 The Applicant has produced an Issues Tracker that has been informed by discussions with consultees and environmental assessments undertaken by the Applicant.

8.1.3 The risks identified carry a Red, Amber, Green status that reflects the potential degree of risk with each issue, as well as the Applicant's intended next steps to resolve the issues. The Issues Tracker will be updated following Public Consultation and shared with the host authorities and statutory consultees, where relevant, to discuss issues identified for further discussion and also invite comments on the Issues Tracker, including other areas for discussion.

8.1.4 The Issues Tracker will culminate in a list of Potential Main Issues for the Examination, which will be submitted with the DCO Application.

8.1.5 Where considered appropriate, the Applicant will meet with technical consultees to provide an update on the Scheme design and discuss issues raised, with the aim of resolving such issues, where practicable.

Arrow Valley Solar