

Dogger Bank South Offshore Wind Farms DCO Application (the Application)

Creyke Beck Solar Limited (company number 13342791) (**CB Solar**) is wholly owned by Padaro Solaer Limited (company number 08021337) (**PS Renewables**). PS Renewables recently purchased CB Solar on 18th September 2024, after the Application was submitted. Accordingly, both companies are not yet registered as an Interested Party for the Application. PS Renewables and CB Solar requests that the Examining Authority accepts this request to register both companies as an Interested Party for the remainder of the examination.

Since PS Renewables was established in 2012, it has rapidly become one of the UK's largest renewable energy development and construction companies, having built over 300 megawatts of solar farms during the subsidy period of 2012 to 2016. Since the withdrawal of these subsidy schemes in 2017, PS Renewables has focused on developing larger utility scale (and subsidy free) energy projects – mainly solar farms, co-located with battery storage. As such, PS Renewables is one of the largest developers of Nationally Significant Infrastructure Projects and other renewable development projects, with over 7 gigawatts of projects in development today.

Interest in the Application

PS Renewables and CB Solar support the principle of the Application to generate renewable energy as part of the transition to net-zero. However, it has fundamental concerns about the Application where it interfaces with CB Solar and PS Renewables' interests in the land at The Risby Estate and Plattwood Farm, Beverley (the **Site**).

The Site has the benefit of planning permission to develop a 49.9MW solar PV generating station Ref: 21/02335/STPLF. The planning permission has been implemented and the solar farm development is already under construction.

In particular, the location of the Application could have a significant detrimental impact on the Creyke Beck Solar Farm and its objective to maximise the generating capacity to supply the national grid electricity transmission network with renewable energy, via an iDNO connection. The objective of the Creyke Beck Solar Farm is a national government priority that is strongly supported across legislation and policy, which is reflected in the Planning Statement (Ref: APP-226), and so it is imperative that the applicant engages with CB Solar and PS Renewables to minimise the impact of the Application.

Interface with the Application

The interface between the Application and the Site is shown on the Land Plans by reference to the following plots in the Book of Reference (Ref: REP4/010), where CB Solar has a category 2 interest in respect of an option to lease agreement dated 11 August 2021:

1. Plot 18-054 – construction vehicle access from public highway;
2. Plot 18-055 – haul road; and
3. Plot 19-007 – onshore cable corridor to National Grid connection.

PS Renewables is also listed in the Book of Reference (Ref: REP4/010) as a category 2 interest in respect of a right to construct over Plot 18-052, which is part of the area for the onshore cable corridor to the National Grid connection. This interest was included in the update of the Book of Reference submitted as part of the November 2024 additional submission (Ref: AS-043)

PS Renewables recognises the importance of the Application as part of delivering net zero, but reducing the developable area of one renewable energy project for another is counterproductive to this objective. This should be properly considered in the context of alternatives locations available. In particular, the southern cable route (shown in Volume 7, Figure 5-3 application ref:

7.5.1) interfaces with the solar farm development and may reduce the developable area for renewable energy generation, depending on the nature and extent of any restrictions in place. If agreement can't be reached between the parties to minimise the impact on the Site, this should be given due weight in the planning balance. The Planning Statement (Ref: APP-226) does not currently refer to the impact on the planning permission at the Site and the weight that should be attributed to it.

PS Renewables and CB Solar note that the applicant has assessed the 'In Isolation Scenario', whereby just the northern cable route would be needed if only one of the project arrays was built out, thereby avoiding the need for the southern route and its potentially negative impacts on the Creyke Beck Solar Farm.

The Applicant has assessed the use of both trenching and trenchless construction methods for the onshore cable that interfaces with the Site, as shown at Obstacle ID OOX-7A. As the Creyke Beck Solar Farm is already being developed, it is requested that the applicant commits to using trenchless methods at sufficient depth for the whole section of cable route that passes through the Site. It is also requested that the applicant agrees that no restrictions will be imposed above the route for maintenance of the cable, that would otherwise prevent the operation of solar panels and associated infrastructure on that land.

Key asks of the Applicant

PS Renewables requests that the applicant:

1. Enters into a legally binding agreement that provides a framework for ongoing engagement in relation to the design of the Application and to provide the necessary protection for the Creyke Beck Solar Farm when works are carried out in close proximity.
2. Enters into discussions on the nature and extent of any proposed restrictions on development at the Site whilst the applicant is constructing and operating its project, taking into account the need to minimise the impact on the generating capacity and the consequential commercial implications, including significant loss of earnings from the Site.
3. Commits to the use of trenchless construction methods for installing the cable route across the Site and confirms that there will be no restrictions over the cable route that would otherwise negatively impact the generating capacity of the Creyke Beck Solar Farm.

PS Renewables and CB Solar look forward to further discussing how best to minimise the interface between the Application and Creyke Beck Solar Farm to ensure that both projects can be successfully delivered as part of the net zero transition.

Padero Solaer Limited and Creyke Beck Solar Limited