



## **Application by RWE Renewables UK Solar and Storage Limited for Peartree Hill Solar Farm (EN010157)**

### **The Examining Authority's (ExA's) written questions and requests for information (ExQ1)**

**Issued on 29 July 2025**

The following table sets out the ExA's written questions and requests for information - ExQ1. If necessary, the examination timetable enables the ExA to issue a further round of written questions in due course. If this is done, the further round of questions will be referred to as ExQ2.

Questions are set out using an issues-based framework derived from the initial assessment of principal issues provided as **Annex C** to the [rule 6 letter](#) dated 24 June 2025. Questions have been added to the framework of issues set out there as they have arisen from representations and to address the assessment of the application against relevant policies.

Column 2 of the table indicates which interested parties and any other persons each question is directed to. The ExA would be grateful if all parties/ persons named could answer all questions directed to them, providing a substantive response, or indicating that the question is not relevant to them for a reason. This does not prevent an answer being provided to a question by a person to whom it is not directed, should the question be relevant to their interests.

Each question has a unique reference number which starts with 1 (indicating that it is from ExQ1) and then has an issue number and a question number. For example, the first question on 'General and cross-topic' issues is identified as 1.1.1. When you are answering a question, please start your answer by quoting the unique reference number.

If you are responding to a small number of questions, answers in a letter will suffice. If you are answering a larger number of questions, it will assist the ExA if you use a table based on this one to set out your responses. An editable version of this table in Microsoft Word is available on request from the Case Team: please contact [peartreehillsolarfarm@planninginspectorate.gov.uk](mailto:peartreehillsolarfarm@planninginspectorate.gov.uk) and include 'Peartree Hill Solar Farm (EN010157)' in the subject line of your email.

**Responses are due by deadline 1: 27 August 2025**



## Abbreviations used:

<b>A</b>	article	<b>HGV</b>	heavy goods vehicle
<b>AIA</b>	Arboricultural Impact Assessment	<b>HRA</b>	Habitats Regulations Assessment
<b>AIL</b>	abnormal indivisible load	<b>IP</b>	interested party
<b>AMS</b>	arboricultural method statement	<b>LWS</b>	local wildlife site
<b>AP</b>	affected person	<b>m</b>	metres
<b>AQMA</b>	air quality management area	<b>NE</b>	Natural England
<b>BESS</b>	battery energy storage system	<b>NGET</b>	National Grid Electricity Transmission plc
<b>BNHIDB</b>	Beverley and North Holderness Internal Drainage Board	<b>NGTL</b>	National Gas Transmission Limited
<b>BNG</b>	biodiversity net gain	<b>NPS</b>	National Policy Statement
<b>BoR</b>	Book of Reference	<b>NRIL</b>	Network Rail Infrastructure Limited
<b>CA</b>	compulsory acquisition	<b>NSIP</b>	Nationally Significant Infrastructure Project
<b>DCO</b>	Development Consent Order	<b>oBSMP</b>	outline Battery Safety Management Plan
<b>dDCO</b>	draft Development Consent order	<b>oCTMP</b>	outline Construction Traffic Management Plan
<b>EA</b>	Environment Agency	<b>oDEMP</b>	outline Decommissioning Management Plan
<b>EM</b>	Explanatory Memorandum	<b>oLEMP</b>	outline Landscape and Ecological Management Plan
<b>ERYC</b>	East Riding of Yorkshire Council	<b>oOEMP</b>	outline Operational Environmental Management Plan
<b>ES</b>	Environmental Statement	<b>oSMP</b>	outline Soil Management Plan
<b>ExA</b>	Examining Authority	<b>oSWMP</b>	outline Site Waste Management Plan
<b>FS</b>	Funding Statement	<b>PA2008</b>	Planning Act 2008
<b>GHG</b>	greenhouse gas	<b>PRoW</b>	public right of way
<b>HDD</b>	horizontal directional drilling	<b>PV</b>	photovoltaic



<b>R</b>	requirement	<b>SoS</b>	secretary of state
<b>RPA</b>	root protection area	<b>SPA</b>	Special Protection Area
<b>RR</b>	relevant representation	<b>SU</b>	statutory undertaker
<b>s</b>	section	<b>tCO<sub>2</sub>e</b>	tonnes of carbon dioxide equivalent
<b>SAC</b>	Special Area of Conservation	<b>TP</b>	temporary possession
<b>Sch</b>	schedule	<b>YWT</b>	Yorkshire Wildlife Trust
<b>SoR</b>	Statement of Reasons	<b>ZoI</b>	Zone of Influence

## The Examination Library

References in these questions set out in square brackets (for example [APP-010]) are to documents catalogued in the Examination Library, which will be updated as the examination progresses. The Examination Library can be obtained from the following link: [EN010157-000189-Peartree Hill Solar Farm - Examination Library.pdf](#)



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ExQ1	Question to:	Question:
1.	General and cross-topic	
1.1.1	The applicant, East Riding of Yorkshire Council (ERYC)	<b>Local Plan</b> The ExA understands that ERYC recently adopted its Local Plan Update (as is noted in [RR-005]). Does this have any implications for the proposed development?
1.1.2	The applicant	<b>National Policy Statements</b> Are there any implications for the proposed development as a result of the government's recent consultation on proposed revisions to the Overarching National Policy Statement (NPS) for Energy (NPS EN-1), the NPS for Renewable Energy Infrastructure (NPS EN-3) and the NPS for Electricity Networks Infrastructure (NPS EN-5)?
1.1.3	The applicant	<b>Solar roadmap</b> The <a href="#">Solar roadmap: United Kingdom powered by solar</a> was issued by the Department for Energy Security and Net Zero on 30 June 2025. Please set out how the proposed development would align with this, including in respect of all aspects of Chapter 5 (supply chain and innovation (including tackling modern slavery/ forced labour)), Chapter 6 (skills) and Chapter 8 (working together).
1.1.4	The applicant, ERYC	<b>Community benefit fund</b> Planning Statement section 3.9 [APP-147] states that there would be a community benefit fund, though this would sit outside of the development consent process and should thus be afforded no weight in the overall planning balance. Please clarify why this is the case, what any such fund might be used for, the likelihood of it materialising, and whether the applicant has been liaising with any parties, such as ERYC, on the matter.
1.1.5	The applicant, ERYC	<b>Planning history</b> Would there be any implications for the projects/ applications listed in Planning Statement Table 2 [APP-147] should development consent be granted?
1.1.6	The applicant	<b>Grid connection</b> Relevant representation (RR) [RR-044] suggests there is a lack of capacity to accommodate the proposed development at Creyke Beck substation. Whilst the ExA understands that there is a grid connection agreement in place for the proposed development for up to 320 megawatts (MW) connecting to this substation [APP-152], please respond to this point. Please also further clarify

ExQ1	Question to:	Question:
		whether the grid connection agreement is reliant on any future extensions to the Creyke Beck substation.
1.1.7	The applicant	<p><b>Grid connection</b></p> <p>ES Chapter 3 paragraph 3.3.2 [APP-039] states that the earliest the proposed development could be connected to the national electricity network and operational is 'Q3 2028'. However, the Planning Statement Appendix 3, paragraph 2.13.15 [APP-147], states that the connection agreement is for connection in 2033. Please clarify:</p> <ul style="list-style-type: none"> <li>a) the earliest date for connection;</li> <li>b) the latest date for connection (noting that the dDCO makes provision for a five-year commencement period); and</li> <li>c) if connection and thus operation were to be beyond 2030, and noting that the intended lifetime is 40 years and that decommissioning is cited to take between 18-24 months (taking it beyond 2070), whether this has any implications for any assessments (such as the Flood Risk Assessment Part 1 [PDA-021] which states at paragraphs 1.1.3 and 5.11.15 that the assessment is based on decommissioning commencing before 2070).</li> </ul>
1.1.8	ERYC	<p><b>Assessments</b></p> <p>The ExA notes that you raise no specific concerns in your RR [RR-001] regarding the proposed development. Please confirm whether you are satisfied with all the assessments that have been undertaken as part of the ES and that any mitigation would be secured through the dDCO [PDA-012] and management documents as necessary.</p>
<b>2. Draft Development Consent Order (dDCO) and other consents</b>		
Note: Questions/ comments relate to dDCO revision 3 [PDA-012] (clean)/ [PDA-013] (tracked)		
<b>General</b>		
1.2.1	The applicant	<p><b>Contents page</b></p> <p>Add an 's' to the word 'order' in '46. Trees subject to tree preservation order' to reflect the title of Article 46 on page 32.</p>
1.2.2	The applicant	<b>Terminology</b>

## ExQ1: 29 July 2025

Responses due by deadline 1: 27 August 2025

ExQ1	Question to:	Question:
		There are various references to 'land plan' and 'land plans' throughout the dDCO – ensure consistency of terms throughout (the ExA notes that the document [PDA-006] is titled 'land plans').
1.2.3	The applicant	<b>Terminology</b> There are various references to 'works plan' and 'works plans' throughout the dDCO – ensure consistency of terms throughout (the ExA notes that the document [PDA-004] is titled 'works plans').
1.2.4	The applicant	<b>Terminology</b> There are various references to 'special category land plan' and 'special category land plans' throughout the dDCO – ensure consistency of terms throughout (the ExA notes that the document [APP-011] is titled 'special category land plans').
1.2.5	The applicant	<b>Cross referencing</b> The applicant should carry out a thorough check of all cross references in the dDCO for accuracy (also, going forward, to ensure that any are amended as necessary should any changes be made to the dDCO during the examination which may affect paragraph/ article/ requirement numbering). For example, the ExA notes that articles 28(3) and 34(9) cross refer to 'article 52 (no double recovery)' though the correct article number for 'no double recovery' is article 53.
1.2.6	The applicant	<b>Explanatory note (page 92 of the dDCO)</b> a) This refers to the 'compulsory purchase of land' and, for clarity, should be amended to refer to the 'compulsory acquisition of land'; and b) Given the document inspection address relates to a third party, provide evidence to show that the party has agreed to this.
1.2.7	The applicant, ERYC, Environment Agency (EA), Natural England (NE), Yorkshire Wildlife Trust (YWT)	<b>Requirements</b> Do you consider whether any further requirements are needed, such as relating to/ to secure the following: proposed permissive paths; proposed community accessible areas; biodiversity net gain; foul and surface water drainage; skills, employment and supply chain (noting NPS EN-1 paragraph 5.13.12); and pre-construction protected species surveys. Please justify your answer and provide preferred wording of any requirements you consider necessary.
<b>Questions/ comments relating to articles (A)</b>		

ExQ1	Question to:	Question:
1.2.8	The applicant	A2 “the Order land” - please review the definition and consider whether it could be more precisely defined to align with the approach used in other made solar DCOs, such as by reference to the different colouring on the Land Plans.
1.2.9	The applicant	A2 “permitted preliminary works” – this allows for works such as (f) the diversion and laying of apparatus, (b) the making of boreholes and (j) site clearance. Given this could occur before the discharge of certain requirements, what implications might this have, for example, for archaeology and ecology (including protected species)?
1.2.10	The applicant	A2 “environmental statement” – please check and confirm whether both sub-paragraphs (a) and (b) should refer to the ‘environmental statement addendum’ as it does, as by doing this, the main environmental statement would not appear to be covered.
1.2.11	The applicant	<p>A3(1) - The ExA notes the explanation in the Explanatory Memorandum (EM) for omitting the words ‘within the Order limits’ from this article. However, to enable to ExA to fully consider the matter, please clarify the following:</p> <ul style="list-style-type: none"> <li>a) The specific buildings and land which may fall under the provisions of A21 (protective works to buildings) and A22 (authority to survey and investigate the land) and the reasons for this;</li> <li>b) How such works could be construed to be within, or where they are shown as falling within the definition of the ‘authorised development’;</li> <li>c) Examples of any other ‘works’ which may be required outside of the Order limits and the reasons for this;</li> <li>d) Any implications for the definition of “the Order limits” in A2, which states ‘means the limits shown on the land plans and works plan within which the authorised development may be carried out and land acquired or used’; and</li> <li>e) The reasons why such works in a) and c) above could not be carried out were the words ‘within the Order limits’ included within A3(1).</li> </ul>
1.2.12	The applicant	A5 - In a similar manner to ExQ1.2.11 above, further justify the reasons for omitting the words ‘within the Order limits’ from this article.
1.2.13	The applicant	A5 – from the ExA’s reading of this article and noting the definition of ‘maintain’ in A2, it appears that A2 could, in theory, allow for the near total removal, reconstruction or replacement of the authorised development at the same time. This could potentially result in, for example, considerable HGV



ExQ1	Question to:	Question:
		<p>movements during the operational phase, notwithstanding the content in, for example, ES Chapter 14: Traffic and Transport paragraphs 14.4.7 and 14.4.8 [APP-050].</p> <p>Please therefore suggest any ways, such as amendments to the dDCO or perhaps to the outline Operational Environmental Management Plan (oOEMP), to give the ExA a greater degree of certainty that this would not occur and thus that any works to maintain the authorised development in the context of the definition of 'maintain' would, with certainty, not give rise to any materially new or materially different environmental effects?</p>
1.2.14	The applicant	<p>A7(1) – this article appears to make provision for works to be carried out beyond the limits of deviation in certain circumstances. The Works Plans [PDA-004] show those limits of deviation. Given that the limits of deviation for most Work Nos. extend either up to or close to the Order limits, this article would appear to allow for works beyond them, thus likely requiring additional land to that shown on the Works Plans and Land Plans [PDA-006] (and all other plans which show the Order limits). Given this:</p> <ol style="list-style-type: none"> <li>Further justify such a provision (noting s153 of the Planning Act 2008 (PA2008) and the procedures for making any post consent (material or non-material) amendments to schemes as set out in the government's guidance 'Planning Act 2008: changes to Development Consent Orders'); and</li> <li>Provide your view on the extent to which the application, if including this article in the dDCO, complies with s122 and s123 of PA2008.</li> </ol>
1.2.15	The applicant	<p>A8 and A9 - please provide full justification as to why powers to transfer the benefit of the Order without the benefit of SoS consent (to those listed in 9(3)) are necessary. Where the purpose of the provision is to enable such person(s) to undertake specific works authorised by the DCO, the transfer of benefit should be restricted to those works. If the provision seeks to permit transfer of compulsory acquisition powers the applicant should provide evidence to satisfy the Secretary of State that such person has sufficient funds to meet the compensation costs of the acquisition.</p>
1.2.16	The applicant	<p>Article 9(6) - this provides for a notification period of five business days in the event of a transfer of the benefit of the Order in circumstances where the consent of the SoS is not required. The ExA notes that other made solar DCOs include a minimum period of 14 working days for the undertaker to notify the SoS of a transfer not requiring consent. Consider amending this provision so that it accords with the majority of other made solar DCOs, or provide an explanation as to why, in the context of this particular application, a shorter period should be applied.</p>

**ExQ1: 29 July 2025****Responses due by deadline 1: 27 August 2025**

<b>ExQ1</b>	<b>Question to:</b>	<b>Question:</b>
1.2.17	The applicant	A11 – reliance is placed on the measures within certain outline management documents and detailed versions of these to manage matters relating to statutory nuisance. Please clarify which measures are of particular relevance.
1.2.18	The applicant	A12 – please clarify why this wide power is necessary and consider whether it should be limited to identified streets such as those listed in Schedule 4.
1.2.19	The applicant	A16(7) – clarify whether, and when, you intend to add the relevant date during the course of the examination.
1.2.20	The applicant	A18 – clarify/ define ‘private road’ and identify, for example on a plan, the relevant roads.
1.2.21	The applicant	A19(2)(e) – should there be a comma after the word ‘Act’?
1.2.22	The applicant	A23(2) – should this article also be subject to A36 (statutory undertakers)?
1.2.23	The applicant	A20 - please explain any implications of s146 of PA2008 on this provision
1.2.24	The applicant	A29(3) to (14) – should these rather be sub-paragraphs of A29(2) (and if so, A29(15) would become A29(3))?
1.2.25	The applicant	A32 – a) the ‘2017 Regulations’ referred to (and in Schedule 9) do not appear to be defined anywhere in the dDCO; b) there appears to be information missing from the three lots of square brackets in A32(2); and c) please direct the ExA to any made solar farm DCOs which includes this article, and if this is not possible, and notwithstanding the information provided in the EM, provide further justification for its inclusion in the dDCO.
1.2.26	The applicant	A34(10) – amend, for clarity and for consistency with numerous other made DCOs, to make provision for the undertaker to not acquire rights and restrictive covenants in addition to not acquiring land.
1.2.27	The applicant	A40(2) – add the word ‘and’ after the semi-colon.
1.2.28	The applicant	A45(1) – this refers to ‘[...] any tree or shrub near the Order limits [...]’. However, the term ‘near’ is imprecise. Also, as the Order limits are effectively the red line boundary, would the wording of the article provide adequate scope for any tree works that may be necessary? Would it be more precise

ExQ1	Question to:	Question:
		and appropriate for the article to be worded '[...] any tree or shrub within or encroaching on land within the Order limits [...]']?
1.2.29	The applicant	A45(4) – on the basis that Schedule (Sch) 13 lists hedgerows proposed for removal, as referred to in A45(5), please further justify this wide power to allow for the removal of any hedgerow within the Order limits.
1.2.30	The applicant	A49 – as with other made DCOs, should provision be made in this article for, words to the effect of 'For the avoidance of doubt, any matter for which the consent or approval of the Secretary of State is required under any provision of this Order is not subject to arbitration.'?
1.2.31	The applicant	A49 – the ExA notes that other made solar DCOs (such as The West Burton Solar Project Order and The East Yorkshire Solar Farm Order) include a separate schedule for 'arbitration rules'. Please clarify why the dDCO in this case does not include such a schedule and explain how, without this, there would be clarity of any arbitration process for parties involved.
1.2.32	The applicant	A52(2) – should this also include other articles, such as A28 (easements and other rights), A34 (temporary use of land for carrying out the authorised development) and A35 (temporary use for maintaining the authorised development), given that these articles also make provision for compensation?
<b>Questions/ comments relating to Schedule (Sch) 2, Part 1 - requirements (R); and Sch 2, Part 2 – procedure for discharge of requirements</b>		
1.2.33	The applicant	Various Rs – there is a slight difference in terminology used in Rs including 'No part of the authorised development may commence...' and 'No part of the authorised development is to be commenced...'. Please clarify whether these terms mean the same thing, and if so, consider, for clarity, whether one term should be used consistently.
1.2.34	ERYC	Various Rs – R5 (Construction traffic management plan), R8 (Battery safety management plan) and R9 (Landscape and ecological management plan) would require the undertaker to consult with relevant parties prior to the submission of details to the local planning authority for approval, with R19 setting out the procedure for this. Please confirm that you are content with this approach rather than the onus being on ERYC to consult the relevant parties.
1.2.35	The applicant	The EA [RR-005] suggests wording for an additional R relating to unsuspected contamination. Please add this or provide justification should you not consider this necessary.

**ExQ1: 29 July 2025****Responses due by deadline 1: 27 August 2025**

<b>ExQ1</b>	<b>Question to:</b>	<b>Question:</b>
1.2.36	The applicant	R1 “design parameters document” – delete the ‘s’ in ‘design parameters documents’ on second line.
1.2.37	The applicant	R1 “outline LEMP” – this should refer to ‘ecological’ rather than ‘ecology’ to reflect the name of the document [PDA-018].
1.2.38	The applicant	R1 “outline site waste management plan” – add the word ‘and’ after the semi-colon at the end of the sentence.
1.2.39	The applicant, ERYC	R2 - should this include provision for details around phasing of the proposed development to be submitted to and approved by the local planning authority and for works to comply with approved details, noting for example that ES Non-Tech Summary paragraph 3.2.1 [APP-094] sets out proposed phases?
1.2.40	The applicant	R2(2) and (3) – the EM does not provide justification for these provisions of R2 – please provide justification and direct the ExA to any other made solar DCOs which include such provisions.
1.2.41	The applicant	R3(1)(f) – should the word ‘and’ be added after the semi-colon?
1.2.42	The applicant, ERYC	R3(1)(g) – should this also include ‘electrical cables’ given that these are cited in Sch 1?
1.2.43	The applicant, ERYC, EA	R4, R6, R7, R8, R14 and R15 – should these requirements for a CEMP, SMP, BSMP, SWMP, OEMP and DEMP make provision for the local planning authority to consult any other parties as part of the approval process, or for any parties to be consulted by the undertaker prior to the submission of details to be discharged by the relevant planning authority (noting for example that the EA has requested [RR-005] to be a consultee on R4, R6 and R8)?
1.2.44	The applicant	R4 - The EA [RR-005] requests an amendment to R4 regarding commencement and contamination (or the removal of (e) relating to remedial contamination works in the definition of “permitted preliminary works” in Part 1 paragraph 2 of the dDCO). Please make the changes or provide justification should you not consider this necessary.
1.2.45	The applicant	R8(3) – should this article include the additional words ‘and maintained throughout the construction, operation and decommissioning of Work No. 2.’?
1.2.46	The applicant	R9 – NE [RR-012] requests to be added as a consultee in respect of this requirement. Would the applicant be willing to do this? If not, please explain your reasoning.

**ExQ1: 29 July 2025****Responses due by deadline 1: 27 August 2025**

<b>ExQ1</b>	<b>Question to:</b>	<b>Question:</b>
1.2.47	The applicant	R11(5) – should this have an implementation clause, to ensure that any temporary fencing for preliminary works would be erected at an appropriate time, in accordance with approved details and removed upon the completion of such works?
1.2.48	The applicant	R15 – should this requirement: a) make provision for the decommissioning and restoration of land of any part of the proposed development should it no longer be in use/ generating electricity before a 40-year period from the date of commissioning; and b) make provision for a timescale in which decommissioning works should be completed?
1.2.49	The applicant	R15 – this makes provision for the submission and approval of a DEMP, in accordance with the outline Decommissioning Management Plan (oDEMP). The oDEMP at paragraph 3.8.2 [APP-155] also refers to a Decommissioning Traffic Management Plan and a Decommissioning Travel Plan. Should R15 therefore also make provision for the submission and approval of these documents?
1.2.50	The applicant	R17 – this would allow for post consent changes to certified documents (that is, those listed in Sch 14 and referred to in R17 as ‘Approved Documents’ and thus forming an integral part of any made DCO). The EM does not provide justification for this wide-ranging provision. Please therefore: a) justify such a provision (noting section 153 of PA2008 and the procedures for making any post consent (material or non-material) amendments to schemes as set out in the government’s guidance ‘Planning Act 2008: changes to Development Consent Orders’); and b) direct the ExA to where any other recently made DCOs include such a provision.
1.2.51	The applicant	R18 - Following on from ExQ1.2.50, and notwithstanding the information within the EM, further justify why this requirement is necessary for this case. The example given regarding consultation on draft control documents would still leave it necessary for the final version of any such documents to be approved in writing following any grant of development consent and prior to works commencing.
1.2.52	The applicant	Sch 2, Part 2, 22(2)(f) – the ExA has not been made aware any other made DCOs which allow only ten business days for an appointed person to determine an appeal. Consider deleting the words ‘but in any event no longer than 10 business days’ from this article.
<b>Questions/ comments relating to other schedules</b>		
1.2.53	The applicant	Sch 1, paragraph 1, “electric cables” – should an ‘and’ or an ‘or’ be added to the end of sub-paragraph (a)?

**ExQ1: 29 July 2025****Responses due by deadline 1: 27 August 2025**

<b>ExQ1</b>	<b>Question to:</b>	<b>Question:</b>
1.2.54	The applicant	Sch 1 – there are various references to both ‘switchgear’ and ‘switch gear’. Ensure consistency of terms to avoid any confusion.
1.2.55	The applicant	Sch 1, Work No. 1 – as there is no Work No. 1A (given that Land Area A was removed from the Order limits before the application was submitted), should ‘(a) Work No. 1A- not used.’ be deleted? If the applicant considers not, an explanation should be provided.
1.2.56	The applicant	Sch 1, Work No. 1 – with the words ‘and associated development within the meaning of section 115(2) of the 2008 Act comprising—’ following on from a semi-colon (and noting the ‘and’ and full stops in the preceding Work Nos. 1A to 1E), any associated development might read as applying to Work No. 1F only. Please address this.
1.2.57	The applicant	Sch 1, Work No. 2(a) – is reference to ‘cell’ correct or should it be ‘cells’, noting that the Design Parameters Document [APP-150] states there would be ‘up to 84 hybrid packs’, with each comprising four BESS units?
1.2.58	The applicant	Sch 1, Work No. 3(a) – is reference to ‘Work No. 6’ correct? It appears to the ExA that the Works Plans [PDA-004] show Work No. 3 connecting itself and other works to Work No. 5, with Work No. 5 then connecting to Work No. 6. Please clarify.
1.2.59	The applicant	Sch 1, Work No. 4 – for clarity, should this state ‘Work No. 4 - development of <u>two</u> onsite substations including-’?
1.2.60	The applicant	Sch 1, Work No. 4A(iv) – should ‘m’ be defined as ‘metres’ somewhere in the dDCO?
1.2.61	The applicant	Sch 1, Work No. 4B(ix) – delete the semi-colon after the word ‘bundling’.
1.2.62	The applicant	Sch 1, Work No. 6(b) – a) ‘GIS’ should be defined somewhere in the dDCO; and b) Noting the use of ‘GIS’ (and other switchgear), please signpost to where in the application documentation you have addressed any implications of this, particularly in respect of paragraphs 2.9.59-64, 2.10.14-15 and 2.11.17 of NPS EN-5 (relating to sulphur hexafluoride). Should this not have been addressed, please provide relevant information.
1.2.63	The applicant	Sch 1, Work No. 6(h) – this includes provision for ‘structures and buildings’. Please provide further details of the types of structures and buildings envisaged and to what extent any potential effects of these (such as from a landscape and visual perspective) have been assessed.

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<b>ExQ1</b>	<b>Question to:</b>	<b>Question:</b>
1.2.64	The applicant	Sch 1, further associated development (q) – this provides for temporary footpath diversions. However, ES Non-Tech Summary paragraph 6.9.3 [APP-094] and ES Chapter 13: Population paragraphs 13.7.2 and 13.9.2 [APP-049], for example, suggest that there would be no suitable routes for footpath diversions. Please clarify this apparent inconsistency.
1.2.65	The applicant	Sch 3 - a) paragraph 1(j) – this appears to be missing the name of the legislation proposed to be disapplied; b) paragraphs 1(h), 1(o) to 1(u) and 1(ff) – should these include the relevant year; c) paragraph 1(ff) – should the word ‘and’ be added after the semi-colon; and d) provide a brief explanation (which could involve updating the EM) as to why all the cited legislation (such as (b) The Associated British Ports Act 1987, (x) The Hull and Leven Canal Act 1801 and (gg) York and North Midland Railway (Canal Purchase) Act 1847) require disapplication.
1.2.66	The applicant	Sch 5, Part 1 and Part 2 – these parts cite the words ‘temporarily closed or restricted’ throughout (as does the associated plan [PDA-005]). a) Should it be made clear which would apply; b) If not, would it be reasonable for the ExA to consider as a worst-case scenario that all the streets and public rights of way (PRoW) listed would be temporarily closed; and c) Do the relevant assessments of the ES (or any other assessments) consider this scenario as a worst-case also?
1.2.67	The applicant	Sch 5, Part 2, Tickton Footpath No. 12 – add a space between the words ‘sheet 13’ and ‘of the’ in column 2.
1.2.68	The applicant	Sch 7, Parts 1 and 2: a) should the ‘traffic measures plans’ be defined in the dDCO and included as a certified document in Sch 14 (the ExA notes that Sch 14 incorrectly refers to a ‘traffic regulation plan’); and b) for clarity, should ‘mph’ be defined in the dDCO?
1.2.69	The applicant	Schedule 9 – notwithstanding the information provided in the EM [AS-009], please further clarify/justify: a) the necessity for this schedule;

ExQ1	Question to:	Question:
		<p>b) whether any houses, building or factories would be affected to necessitate the provisions of paragraph 10 relating to 'Schedule 2A of the 1965 Act'; and</p> <p>c) whether any other made solar farm DCOs include a similar schedule.</p>
1.2.70	The applicant	Schedule 10- for clarity, should this be titled 'Land of which <u>only</u> temporary possession may be taken'? If so, amend references to this schedule elsewhere in the dDCO (such as the contents page and A34(a)(i)).
1.2.71	The applicant	<p>Sch 11 – consider the following and amend as necessary:</p> <p>a) Part 2, paragraph 5(1)(a) – add 'and' after the semi-colon;</p> <p>b) Part 2, paragraph 6 – second to last definition add 'and' after the semi-colon;</p> <p>c) Part 2, Paragraph 6 – the final definition refers to 'sub-paragraph (1)', however, there is no such sub-paragraph in paragraph 6;</p> <p>d) Part 3 paragraph 7(1)(a) – add 'and' or 'or' as necessary after the semi-colon; and</p> <p>e) Part 4, paragraph 8(1)(a) – add 'and' or 'or' as necessary after the semi-colon.</p>
1.2.72	The applicant	Sch 11 - Notwithstanding ExQ1.2.71, please provide further detail in the EM to justify this schedule and signpost to any other examples of made solar farm DCOs which include such.
1.2.73	The applicant	<p>Sch 12 – consider the following and amend as necessary:</p> <p>a) Part 2, paragraph 15(6) – add a full stop;</p> <p>b) Part 3, paragraph 17 "plans"- add 'and' after the semi-colon;</p> <p>c) Part 4, paragraph 26(2) "remote defence" - add 'and' after the semi-colon; and</p> <p>d) Part 4, paragraph 26(2) "sea defence" – delete the space between the word 'bank' and the comma (though please also note ExQ1.3.31(e)).</p>
1.2.74	The applicant	Sch 13, Part 2 – some hedgerows appear to be incorrectly numbered with an additional zero (including H0014, H0015, H0016, H0024 and H0043) when compared with the relevant plan [PDA-007]. Please address as necessary
1.2.75	The applicant	Paragraph 5.1.33 of the EM [AS-009] states that 'Schedule 13 (Hedgerows to be removed) lists the hedgerows that the Applicant is allowed to remove along with the specific purpose of each removal [...]'. Schedule 13 of the dDCO does not appear to include the specific purpose for the proposed removals. Please address this.



**ExQ1: 29 July 2025****Responses due by deadline 1: 27 August 2025**

<b>ExQ1</b>	<b>Question to:</b>	<b>Question:</b>
1.2.76	The applicant	Sch 14 – this refers to ‘Article 46’ but the correct article is 47 – please amend and undertake a full check of cross referencing for accuracy.
1.2.77	The applicant	Sch 14 – ‘Street rights of way and access plan’ should be ‘Streets, rights of way and access plans’ and ‘Traffic Regulation Plan’ should be ‘Traffic Measures Plan’.
1.2.78	The applicant	Sch 14 – should this include other documents, such as the Design Approach Document, Commitments Register, Special Category Land Plan, Crown Land Plan and Indicative Layouts and Cross Section Plan? If you consider not, please explain the reason for this.
1.2.79	The applicant	Sch 14 – it would be helpful if additional columns could be added to identify the relevant date and EL reference number of the documents in the interests of clarity and ease of checking for accuracy.
1.2.80	The applicant	Sch 14 – please ensure this is updated with the most recent document versions as necessary during the examination. For example, the ExA notes that this schedule was not updated from the previous version of the dDCO in respect of the updated Book of Reference (BoR) [PDA-016].
1.2.81	The applicant	Explanatory note – this should refer to ‘compulsory acquisition of land’ rather than ‘compulsory purchase of land’.
<b>Explanatory Memorandum (EM)</b>		
1.2.82	The applicant	Paragraph 4.4.1 of the EM [AS-009] refers to the SoS’s removal of the words ‘within the Order limits’ from A3 in the ‘A303 Amesbury to Berwick Down Correction Order’. Please signpost to where this correction order and related SoS decision on this matter can be located (a gov.uk website link would suffice).
1.2.83	The applicant	Please update the EM as necessary when any amendments to the dDCO are made.
<b>3. Compulsory acquisition (CA), temporary possession (TP) and related matters</b>		
1.3.1	The applicant	<b>Justification for CA</b> On the basis that the use of the land for the proposed solar arrays and associated infrastructure would be temporary, albeit for the long-term (40 years), please clarify why CA of land/ rights is sought rather than temporary possession?
1.3.2	The applicant	<b>Justification for CA</b>

ExQ1	Question to:	Question:
		<p>ES Appendix 7.10 Biodiversity Net Gain (BNG) Assessment Figure 3 (pg 20 of 28) [APP-144] identifies areas E13 and E14 (area numbering as shown on ES Figure 3.4 [APP-058]) as 'mitigation grassland'. ES Figure 7.1 [APP-065] also shows these areas for mitigation. However, Appendix C of the BNG Assessment suggests that E-coded fields are enhancement areas and ES Figure 3.4 annotates these areas as providing 'benefits'. Please clarify:</p> <p>a) Whether areas E13 and E14 (and other E-coded and relevant areas) are wholly for mitigation purposes; and</p> <p>b) If not, and in respect of those areas identified as 'ecological enhancement areas' on ES Figure 7.1, provide further justification for the CA of this land, including in national and local policy terms, noting that biodiversity net gain is not currently a requirement for NSIPs under the provisions of the Environment Act 2021.</p>
1.3.3	The applicant	<p><b>Justification for CA</b></p> <p>Please clarify the reason why some plots cited in the Statement of Reasons (SoR) [PDA-014] as being required for Work No. 8 are proposed for CA of land (such as Plots 2-5, 2-6 and 2-9), whereas others (such as Plots 2-7 and 2-8) are identified for CA of rights only?</p>
1.3.4	The applicant	<p><b>Justification for CA</b></p> <p>The SoR, including at paragraph 13.1.3 [PDA-014], states that 'The Applicant has entered into voluntary option agreements with the freehold owners of most of the Land Areas on which Solar PV Development, green infrastructure and habitat creation would be situated.' Given this, please justify the reasons for continuing to seek CA powers over this land/ the relevant plots.</p>
1.3.5	The applicant	<p><b>Plot 17-5</b></p> <p>Clarify why this plot includes, for example, an area of woodland (G433 in the Arboricultural Impact Assessment (AIA) [APP-115]), given that this is not mentioned in the BoR plot description, does not appear to be required for cabling works, and does not appear to be identified for any improvement or enhancement works under Work No. 6 in the dDCO?</p>
1.3.6	The applicant	<p><b>Plots 2-9, 2-10, 2-11 and 2-14</b></p> <p>Please provide further justification for the extent of these plots, given, for example, that the Indicative Environmental Masterplan [APP-058] appears to indicate that the whole of the plots are not required for passing places/ internal access roads.</p>

ExQ1	Question to:	Question:
1.3.7	The applicant	<p><b>Schedule of negotiations and powers sought</b></p> <p>Please clarify the reasons why not all plots associated with certain affected persons, albeit proposed for CA of land or rights, are cited in this document [APP-025] (for example Plots 3-11, 3-13, 5-2, 5-8, 5-9, 5-11, 8-2 and 8-3 regarding William Anthony Bethell; Plots 4-5, 4-6, 4-7, 4-8, 4-9, 4-11, 4-12, 5-6 and 5-7 regarding Anthony Annable Towne; and Plots 3-6, 3-7, 3-8, 3-10 and 3-11 (amongst others) regarding ERYC)?</p>
1.3.8	The applicant	<p><b>Schedule of negotiations and powers sought</b></p> <p>The ExA notes the applicant's view that due to its connection with the JBM Solar Projects 33 Limited, no agreement is required in respect of the land owned by this company. Please clarify your connection with this company and provide further justification on this matter.</p>
1.3.9	The applicant	<p><b>Figham Common</b></p> <p>Planning Statement Paragraph 8.10.13 [APP-147] states that there would be approximately 1.7km of HDD within Figham Common. The oCEMP Table 5-1 [APP-153] sets out that the grid connection cable route would 'be installed using HDD underneath the majority of Figham Pastures LWS'. However, the above appears to contradict what is shown on the Indicative HDD Crossing Points plan [APP-057].</p> <ul style="list-style-type: none"> <li>a) Please clarify the above (noting that the EA [RR-005] suggests that HDD should be adopted under the whole of Figham Common);</li> <li>b) Provide a plan which clearly shows the extent of Figham Pastures LWS or signpost to where this has been provided (this LWS tends to be shown as a green or pink dot rather than a defined boundary on the submitted plans, such as on [PDA-009 and APP-054]); and</li> <li>c) Noting [RR-018], set out the likely duration of works within Figham Common/ Figham Pastures LWS and implications for continued public access to the land during this time.</li> </ul>
1.3.10	The applicant	<p><b>Figham Common</b></p> <p>The Land Plans [PDA-006] show a cable corridor width of around 400m in some places, including at Figham Common (Plot 13-6). Noting that around a 30m width would actually be required to construct the cable route (as suggested in paragraph 10.1.7 of the SoR [PDA-014]), please justify the geographical extent of CA of rights sought along the proposed cable corridor, noting that the applicant should be seeking no more land than is reasonably required.</p>

ExQ1	Question to:	Question:
1.3.11	The applicant	<p><b>Figham Common</b></p> <p>The SoR [PDA-014] refers to Figham Common as 'open space' (such as in paragraph 1.1.12) though the BoR [PDA-016] identifies it as 'common land'. Planning Statement paragraph 1.5.1 [APP-147] refers to it as 'open space and common land'. Please clarify which you consider it is in the context of s132 of PA2008.</p>
1.3.12	Beverley Pasture Masters	<p><b>Figham Common</b></p> <p>Noting your RR [RR-024], the Design Parameters Document (under Work No.5) [APP-150] sets out that any cable trenches would be a minimum of 1.2m in depth. Should trenching be adopted, would such a depth address your issues cited at points 5 and 6 of your RR? If not, please explain why.</p>
1.3.13	Beverley Pasture Masters	<p><b>Figham Common</b></p> <p>Noting your issues cited at points 7 to 9 of your RR [RR-024], the applicant has provided an outline Soil Management Plan (oSMP) [APP-159] and an outline Landscape and Ecological Management Plan (oLEMP) [PDA-018], detailed versions of which would be secured through requirements 6 and 9 of the dDCO [PDA-012] respectively. Do the contents of these documents and the provisions of the dDCO address the issues that you highlight?</p>
1.3.14	The applicant	<p><b>Community accessible land</b></p> <p>Planning Statement paragraph 3.9.8 [APP-147] states that community accessible areas are proposed and secured and detailed in the oLEMP and Indicative Environmental Masterplan. However, oLEMP paragraph 16.1.1 [PDA-018] states that 'The use of areas under consideration for community accessible land [...] will be determined at the detailed design stage'. This suggests that not all areas identified on the Indicative Environmental Masterplan [APP-058] as community accessible land may be used for such a purpose.</p> <ol style="list-style-type: none"> <li>Please clarify, in light of this, to what extent the applicant can demonstrate it has a clear idea of how it intends to use the land which it proposes to acquire, as per paragraph 9 of the Department for Communities and Local Government publication 'Planning Act 2008 Guidance related to procedures for the compulsory acquisition of land' (2013) (CA Guidance);</li> <li>Explain how such use of such land would be required for the development to which the development consent would relate or would be required to facilitate or would be incidental to the development (s122(2)(a) and (b) of PA2008); and</li> </ol>

**ExQ1: 29 July 2025****Responses due by deadline 1: 27 August 2025**

<b>ExQ1</b>	<b>Question to:</b>	<b>Question:</b>
		c) Whether there would be any conflict with such use of the land and proposed ecological mitigation in the same areas?
1.3.15	The applicant	<b>Land Plans</b> Annex C paragraph 5 of the CA Guidance indicates that where it is necessary for the land plan to have more than one sheet, appropriate references must be made to each of them in the text of the draft order so that there is no doubt that they are all related to the order. Please signpost where these references can be found or include appropriate references in subsequent versions of the dDCO.
1.3.16	The applicant	<b>Funding</b> Does the Funding Statement (FS) [APP-024] include/ address costs associated with the eventual decommissioning of the proposed development and restoration of land? If not, please address this matter.
1.3.17	The applicant	<b>Funding</b> Noting paragraph 6.2.1 of the FS [APP-024], clarify what approval would be needed and how certain the ExA can be that this would be granted?
1.3.18	The applicant	<b>Book of Reference</b> The BoR [PDA-016] refers to 'Table 3-1' twice but there is no such table. Please address this.
1.3.19	The applicant	<b>Book of Reference</b> There are numerous entries in the BoR [PDA-016] which cite 'unknown' or 'unknown address'. Please provide an update on efforts to establish these owners/ interests/ addresses and details of what further steps will be undertaken to identify these.
1.3.20	The applicant	<b>Statement of Reasons</b> Noting paragraph 8.1.4 of the SoR [PDA-014], does the applicant already hold an interest in any of the land (the ExA is unable to find the applicant listed in the BoR)? If not, please explain the purpose of this paragraph.
1.3.21	The applicant	<b>Statement of Reasons</b> SoR paragraph 7.8.4 (final bullet) [PDA-014] cites the provision of an outdoor classroom for public use. Please signpost to where this is cited/ addressed/ secured in other application documents/

ExQ1	Question to:	Question:
		plans/ the dDCO, as well as where its long-term management, along with the provision and long-term management of 'community accessible land' would be secured over the longer term?
1.3.22	The applicant	<b>Book of Reference and Land Plans</b> Noting paragraph 6.3.3 of the SoR [PDA-014], should the third column of Table 5.1 of the BoR [PDA-016] reflect, for clarity, that land coloured pink on the Land Plans would also be used temporarily?
1.3.23	The applicant	<b>Advances in technology</b> RR [RR-047] makes reference to developing solar panel technology. Noting that the dDCO makes provision for the commencement of works no later than five years from the date of any Order being made, what consideration has been given to the utilisation of such technology in order to minimise the amount of land required for the proposed development?
1.3.24	The applicant	<b>Clarification</b> Please confirm that there is no National Trust land within the Order limits.
1.3.25	The applicant	<b>Land/ rights interests and BoR</b> National Gas Transmission Limited [RR-009] indicates that it has rights in land associated with its infrastructure in Plots 13-3, 13-4, 13-5, 13-6, 13-7, 13-8 and 14-1 but is not included in the BoR in respect of this (the ExA notes that this SU is in the BoR regarding ownership of Plot 12-8). Please liaise with this SU and update the BoR as necessary.
1.3.26	The applicant	<b>Category 3 parties</b> a) Notwithstanding SoR paragraphs 11.2.8-12 [PDA-014], please provide further detail/ justification of how you have identified category 3 parties for the purposes of the BoR [PDA-016]. b) Having reviewed RRs and other submissions, are there any other persons who might be entitled to make a relevant claim if the DCO were to be made and fully implemented and should therefore be added as category 3 parties to the BoR (this could include, but not be limited to, those that have provided representations on, or have interests in: noise, vibration, smell, fumes, smoke or artificial lighting; the effect of construction or operation of the proposed development on property values or rental incomes; concerns about subsidence or settlement; claims that someone would need to be temporarily or permanently relocated; impacts on a business; loss of

ExQ1	Question to:	Question:
		rights, such as to a parking space or access to a private property; concerns about project financing; claims that there are viable alternatives; or blight).
1.3.27	National Gas Transmission Limited (NGTL), the applicant	<p><b>Protective provisions</b></p> <p><u>To NGTL</u></p> <p>The ExA notes that you request protective provisions as per your RR [RR-009]. The dDCO [PDA-012] includes protective provisions for gas undertakers, amongst others, at Schedule 12, Part 1. Please clarify whether these are acceptable to you and if not, provide any alternative wording for protective provisions for the ExA's and the applicant's consideration. Please also continue to liaise with the applicant on the matter as necessary to reach an agreement.</p> <p><u>To the applicant</u></p> <p>Please continue to liaise with NGTL on the matter of protective provisions in light of its RR [RR-009] as necessary to reach an agreement and provide an update on the matter.</p>
1.3.28	The applicant	<p><b>Protective provisions</b></p> <p>Network Rail Infrastructure Limited (NRIL) requests protective provisions be included in the dDCO in the form it has provided in Appendix 1 of its RR [RR-013]. The ExA notes from the consultation report (including entry 34 on page 19 of Appendix G [APP-033]) that protective provisions were in the dDCO at that time. However, these do not appear in the application or revised version. Do you intend to include these as requested by NRIL, noting that they appear to largely reflect those included in other made solar DCOs, such as The West Burton Solar Project Order 2025 and The East Yorkshire Solar Farm Order 2025 (with the exception of the final paragraph)? Please liaise with this SU on the matter and provide an update.</p>
1.3.29	The applicant, Northern Powergrid (Yorkshire) plc	<p><b>Protective provisions</b></p> <p>Weightmans LLP on behalf of Northern Powergrid (Yorkshire) LLP [RR-015] (cited elsewhere in the RR and the BoR as 'Northern Powergrid (Yorkshire) plc') indicates that it is keen to agree bespoke protective provisions with the applicant. Please confirm whether it is 'LLP' or 'plc' and that negotiations have commenced/ are ongoing and when they are likely to be agreed/ concluded. Also, provide an update on where any key matters of dispute remain.</p>

ExQ1	Question to:	Question:
1.3.30	The applicant, National Grid Electricity Transmission plc (NGET)	<p><b>Protective provisions</b></p> <p>NGET [RR-010] requests protective provisions reflective of those in the Awel y Môr (AyM) Offshore Wind Farm Order 2023.</p> <p><u>To the applicant</u></p> <p>a) Confirm whether you intend to include similar protective provisions in the dDCO, and if not, explain your reasons.</p> <p><u>To NGET</u></p> <p>b) In the penultimate paragraph of your RR, you state that where the applicant seeks powers of compulsory acquisition over NGET's land or rights, the protective provisions must require that the applicant first obtains your consent. Please signpost to the paragraph in the made AyM DCO which makes provision for this.</p>
1.3.31	The applicant, EA	<p><b>Protective provisions</b></p> <p>The applicant updated Schedule 12, Part 4 of the dDCO in respect of protective provisions for the EA.</p> <p><u>To the EA</u></p> <p>a) confirm whether you are content with the updated wording;</p> <p>b) if so, confirm whether this alleviates your concern regarding the disapplication of the legislative provisions referred to in your RR [RR-005] (articles 10(1)(c) and (e) of the dDCO);</p> <p>c) if not, please explain why and provide your preferred wording; and</p> <p>d) notwithstanding any potential discussions on protective provisions, please set out any implications for the disapplication of the legislative provisions referred to in your RR.</p> <p><u>To the applicant and the EA</u></p> <p>e) clarify the relevance of 'sea defence' matters as referred to in paragraph 26(2), given the inland location of the proposed development; and</p> <p>f) the ExA notes the protective provisions for the EA at Schedule 14, Part 5 of the East Yorkshire Solar Farm Order 2025, for example. Should agreement not be reached between yourselves on matters relating to protective provisions, would anything prevent the ExA from adopting these in any recommended DCO?</p>



**ExQ1: 29 July 2025****Responses due by deadline 1: 27 August 2025**

<b>ExQ1</b>	<b>Question to:</b>	<b>Question:</b>
1.3.32	The applicant, Yorkshire Water Services	<p><b>Protective provisions</b></p> <p><u>To Yorkshire Water Services</u></p> <p>Schedule 12, Part 1 of the dDCO [PDA-012] sets out protective provisions for certain undertakers, including in respect of water and sewerage. Please confirm whether these are appropriate or whether you are requesting bespoke protective provisions. If bespoke, please provide suggested wording.</p> <p><u>To the applicant</u></p> <p>Please liaise with Yorkshire Water Services in respect of the contents of its RR [RR-016] and provide an update.</p>
1.3.33	Beverley and North Holderness Internal Drainage Board (BNHIDB)	<p><b>Protective provisions</b></p> <p>The applicant amended Schedule 12 Part 3 of the dDCO [PDA-012] to remove reference to 'East' from the name of BNHIDB. Please confirm whether you are satisfied with the protective provisions as set out in the dDCO and that they address the points raised in you RR, and if not, please provide alternative wording.</p>
1.3.34	The applicant	<p><b>S127/ s138 of the Planning Act 2008</b></p> <p>In any Land Rights Tracker or similar document, please clearly set out with regard to statutory undertakers, whether and why (or why not) any provisions of s127 and/ or s138 of the Planning Act 2008 (PA2008) applies and whether/ how any of these provisions would be met.</p>
1.3.35	The applicant, ERYC	<p><b>BoR</b></p> <p>The ExA notes that the BoR [PDA-016] identifies National Highways Limited as being the freehold owner and an occupier of Plot 16-7 (part of the A1079) which the applicant is seeking to acquire new rights over in respect of cabling works below the road. The Schedule of Negotiations and Powers Sought [APP-025] notes that the land was transferred to ERYC as local highways authority. Should the BoR be updated to reflect this and does this have any implications for the provisions of the dDCO?</p>
1.3.36	The applicant, The Crown Estate	<p><b>Crown land</b></p> <p>Provide an update as to the position in respect of Crown land (Plot 13-4) and the progress made to obtain relevant consent under s135(1) and/ or s135(2) of PA2008 from The Crown Estate and the</p>

ExQ1	Question to:	Question:
		likely timetable for this. Written evidence of consent obtained is required as soon as possible and in any event by the close of the examination.
1.3.37	The applicant	<b>Land rights</b> RRs [RR-031, RR-034, RR-035, RR-041 and RR-042] suggest that these IPs may have land/ rights interests. However, these IPs do not appear to be included in the BoR. Please clarify the status of these IPs (that is, whether they are affected persons).
1.3.38	The applicant	<b>Lessees or tenants in the BoR</b> The BoR [PDA-016] identifies very few plots with lessee or tenant interests and those which are identified relate to either the EA or Northern Powergrid (Yorkshire) plc. However, ES Chapter 13: Population paragraph 13.5.9 [APP-049] identifies that two farms are run by tenant farmers. a) Please explain this apparent anomaly and provide details of which farms are run by tenant farmers and which plots are associated with these farms; b) Set out any implications for the BoR in light of this; and c) Clarify whether the tenant farmers are aware of and have been appropriately consulted on the proposed development and provide details of any negotiations which been undertaken with them.
1.3.39	The applicant	<b>Reasonable alternatives to CA</b> In the light of the CA Guidance and in particular paragraph 8, please explain how the ExA can be assured that all reasonable alternatives to CA (including modifications to the scheme) have been explored. Please set out in summary form, with document references where appropriate, what assessment/ comparison has been made of the alternatives to the proposed acquisition of land or interest in each case.
1.3.40	The applicant	<b>Negotiations</b> The final column for entry 7 on page 34 of the Schedule of Negotiations and Powers Sought [APP-025] refers to 'the Council's highways department'. Please confirm whether this is a typo and should instead refer to NRIL.
1.3.41	Affected persons	<b>Potential inaccuracies</b> Are any parties aware of any inaccuracies in the BoR [PDA-016], SoR [PDA-014], or Land Plans [PDA-006]? If so, please set out what these are and provide the correct details.

ExQ1	Question to:	Question:
1.3.42	Affected persons	<b>Other concerns</b> Does any affected person have any concerns that they have not yet raised about the legitimacy, proportionality or necessity of the CA/ TP powers sought by the applicant that would affect their land or their rights in land?
1.3.43	The applicant	<b>Equalities Act 2010</b> a) Noting that section 12.3.1 of the SoR [PDA-014] is very brief, please expand on how you have had regard to the Equality Act 2010 in relation to the powers sought; and b) Have any affected persons or interested parties been identified as having protected characteristics and, if so, what regard has been given to them?
<b>4. Need, site selection and alternatives</b>		
1.4.1	The applicant	<b>Output</b> Some documents (such as Planning Statement paragraph 9.1.18 [APP-147]) cite the proposed electrical output capacity as 320MW. However, Schedule 1, Work No. 1 of the dDCO [PDA-012] cites that it would be 'over 50 megawatts'. How certain can the ExA be of the level of electrical output capacity given this, and might this have any implications for the degree of benefits which could be afforded to the proposed development in this regard?
1.4.2	The applicant	<b>Output per acre</b> Noting NPS EN-3 paragraph 2.10.17 (and [RR-033, AS-003 and RR-044]), please clarify the acreage per MW of proposed output. If greater than between 2 to 4 acres per MW, please explain the reason for this and to what extent this would comply with the above cited NPS paragraph.
1.4.3	The applicant	<b>Overplanting</b> Further to ExQ1.4.2, the ExA notes that there would be an element of overplanting as part of the proposed development and the explanation for this in the Planning Statement and its appendices [APP-147]. a) Please elaborate further on why an overplanting ration of 1.6 is proposed when Figure 7.6 and paragraph 6.6.40 in Appendix 3 indicate an increasing inefficiency beyond an overplanting ratio of around 1.3 (it would be helpful to also provide further explanation of the relationship between Figures 7.5 and 7.6 of Appendix 3 to aid the ExA's understanding of how an overplanting figure of 1.6 has been arrived at);

ExQ1	Question to:	Question:
		<ul style="list-style-type: none"> <li>b) Please provide the amount of land (in hectares/ acres) and its current land use which would be required for the overplanting and where within the Order limits this would be located;</li> <li>c) Please explain how the proposed battery energy storage affects any requirements for overplanting; and</li> <li>d) The ExA is aware of a recent legal judgment related to overplanting (Ross v Secretary of State for Housing, Communities and Local Government [2025] EWHC 1183 (Admin)) – please comment on any implications of this for the proposed development and the ExA’s consideration of it.</li> </ul>
1.4.4	The applicant	<p><b>Grid connection</b></p> <p>The Planning Statement and its appendices [APP-147] make numerous references to the government’s Clean Power 2030 Action Plan (2024). Planning Statement Appendix 3 states that the proposed development would be connected to the Creyke Beck substation in 2033. Please clarify:</p> <ul style="list-style-type: none"> <li>a) The reason for this date;</li> <li>b) Whether there is potential for this date to move forward to 2030 or earlier; and</li> <li>c) If not, to what extent the proposed development would contribute to meeting the aims of the Clean Power 2030 Action Plan.</li> </ul>
1.4.5	The applicant	<p><b>BESS</b></p> <p>The BESS would be dispersed across Land Areas B-F rather than, as an alternative, being clustered in one area. Please clarify why this approach has been adopted and what consideration has been given to it, for example, from a landscape and visual and health and safety perspective?</p>
1.4.6	The applicant	<p><b>Design</b></p> <p>ES Chapter 4 paragraph 4.7.1 [APP-040] states that ‘[...] the detailed design of the proposed development is secured through the DCO to ensure that any further design iterations remain in accordance with the design principles and parameters.’ However, the ‘design principles’ are set out in the Design Approach Document [APP-149] which is not specifically referenced in the dDCO. How thus would the dDCO secure this and should this document be referenced in R3 (detailed design approval) of the dDCO, defined in the dDCO and included as a certified document in Schedule 14 of the dDCO?</p>
1.4.7	The applicant	<b>Brownfield/ industrial land</b>

ExQ1	Question to:	Question:
		A number of RRs (such as [RR-027, RR-033, RR-039 and RR-047]) suggest that solar panels should be located on brownfield or industrial land rather than agricultural fields. NPS EN-3 paragraph 2.10.29 also indicates that where possible, such land should be utilised. What consideration was given to the utilisation of brownfield/ industrial land as part of the site selection process?
1.4.8	The applicant	<b>Site selection</b> Noting NPS EN-3 paragraph 2.10.87, please explain to what extent the avoidance of the need to impact on existing drainage systems and watercourses was considered as part of the site selection process. This does not appear to have been addressed in Planning Statement section 5 [APP-147] or materially addressed in Planning Statement Appendix 1 (page 140).
1.4.9	The applicant	<b>Alternatives to culverting</b> Following on from ExQ1.4.8, and noting the EA's RR [RR-005], please explain: <ul style="list-style-type: none"> <li>a) to what extent the proposed development would align with NPS EN-3 paragraphs 2.10.87 and 2.10.88 relating to the avoidance of culverting and the demonstration that no reasonable alternatives to culverting exist; and</li> <li>b) in relation to NPS EN-3 paragraph 2.10.88, whether, and which proposed culverts would be retained beyond the construction period and the reasons for this.</li> </ul>
<b>5. Air quality</b>		
1.5.1	The applicant	<b>Study area</b> ES Chapter 6 paragraph 6.7.2 [APP-042] mentions, with regard to dust and particulate matter emissions, that 'four LWS's and one semi-natural AW have been identified within the Order limits or within 200m from the Order limits'. However, paragraph 6.4.7 suggests the study area in this regard for designated sites to be 50m from the Order limits. In addition, ES Figure 6.1 [APP-063] does not identify a 200m study area. Please clarify.
1.5.2	The applicant	<b>Study area</b> ES Chapter 6 paragraph 6.4.7 [APP-042] sets out that human receptors are said to have a study area for demolition, earthworks and general construction activities of up to 250m from the Order limits, and for trackout, 50m from roads affected. For designated sites, the study area for demolition, earthworks, general construction activities <i>and trackout</i> are said to be 50m from the Order limits.

ExQ1	Question to:	Question:
		Please explain the difference of approach for the trackout study areas for human and designated site receptors (that is, why designated sites 50m from Order limits are considered rather than 50m from roads affected as is the case for human receptors).
1.5.3	The applicant	<p><b>Study area</b></p> <p>ES Chapter 6 paragraph 6.5.1 [APP-042] states that there are no air quality management areas (AQMA) in the administrative area of ERYC, within which the proposed development would be located. Paragraph 6.3.4 notes that the applicant has not considered it necessary to consult with Hull City Council in relation to air quality impacts given that the proposed development would be outside of its administrative area. However, the study area for transport and access [APP-089] shows a route through the city of Hull (A63). Please clarify whether there are any relevant AQMAs within the city Hull and if so, the potential for effects on any AQMA (or justification of why an assessment has not been carried out in this regard should there be any AQMAs in the city of Hull).</p>
1.5.4	The applicant	<p><b>Study area</b></p> <p>Please clarify what the 20m (green) and 100m (purple) 'study areas' shown on ES Figure 6.1 [APP-063] represent and where these 'study areas' are referred to in ES Chapter 6 [APP-042].</p>
1.5.5	The applicant	<p><b>Assessment</b></p> <p>The ExA notes the contents of the outline Battery Safety Management Plan [APP-157]. However, should there be any fires, what effects might this have on matters relating to air quality and does this/ should this form part of the air quality assessment?</p>
1.5.6	The applicant	<p><b>Assessment</b></p> <p>The ExA notes the second half of ES Chapter 6 paragraph 6.7.8 [APP-042] regarding heavy duty vehicles and air quality effects and its reference to Table 6.11. However, Table 6.11 does not include the air quality standards/ objectives in respect of PM<sub>2.5</sub> to enable a comparison of this against the annual average for the area. Please clarify the figure (or confirm whether it is '20µg/m<sup>3</sup>' as per paragraph 6.5.3).</p>
1.5.7	The applicant	<p><b>Human receptors</b></p> <p>ES Chapter 6 paragraph 6.7.2 [APP-042] and ES Appendix 6.1: Air Quality Assessment paragraph 6.8 [APP-103] set out that human receptors within 250m of the Order limits have been identified as the 'villages of Riston and Woodmansey'. Please clarify:</p>

ExQ1	Question to:	Question:
		a) whether this is referring to the village of <u>Long</u> Riston; b) whether all residents of these two villages are the identified receptors; and c) the reasons why these are the only identified human receptors, noting for example, that part of the village of Weel, some individual properties (such as Carr House Farm (near Long Riston) amongst others) and numerous public rights of way appear to fall within the 250m study area as shown on ES Figure 6.1 [APP-063].
1.5.8	The applicant	<b>Interim guidance</b> Please address the government's <a href="#">PM<sub>2.5</sub> Targets: Interim Planning Guidance</a> and any implications this may have for the proposed development.
<b>6. Biodiversity (including Habitats Regulations Assessment (HRA))</b>		
1.6.1	The applicant	<b>Bats – residual effect</b> ES Chapter 7 paragraph 7.9.52 [APP-043] states that ‘once created and improved habitats have fully established, the residual effect on bats is considered to be long term, but highly localised and not significant at the Local level’. Please confirm whether the residual effect in this regard would be positive, neutral, or negative.
1.6.2	The applicant	<b>Impact on owls/ birds of prey</b> Please respond in detail to concerns raised in a number of RRs [including RR-027, RR-041 and RR-049] regarding the potential impact on owls and birds of prey, due to a loss of feeding habitat.
1.6.3	The applicant	<b>Grassland under solar PV modules</b> With regard to the grassland proposed in areas under the proposed solar PV modules, would there be a difference in biodiversity provision when compared to open grassland?
1.6.4	The applicant	<b>Box culverts</b> ES Chapter 7 paragraph 7.4.31 [APP-043] refers to the need for box culverts, rather than open span bridges. Given the impact of box culverts on biodiversity and habitat, please explain why these would be proposed? In addition, please explain whether the culverts would be temporary or permanent, including implications for maintenance and decommissioning.
1.6.5	The applicant	<b>Species protection plans</b>

**ExQ1: 29 July 2025****Responses due by deadline 1: 27 August 2025**

<b>ExQ1</b>	<b>Question to:</b>	<b>Question:</b>
		ES Chapter 7 [APP-043] states that species protection plans would be produced by the principal contractor if required, based on pre-construction surveys. Please confirm whether the principal contractor would be suitably qualified to produce the plans, including whether they would be assisted by a suitably qualified ecologist and whether the plans should be submitted for approval by a statutory body such as ERYC or NE?
1.6.6	The applicant	<b>Horizontal directional drilling (HDD) and bentonite breakout</b> ES Chapter 7 paragraph 7.8.9 [APP-043] states that the oCEMP [APP-153] details and secures a specific HDD methodology, as well as a HDD breakout plan specifically to manage the risk of bentonite breakout. Please confirm that the document is referring to Section 4.9 of the oCEMP and signpost where the document details how such methodology and plans would be secured.
1.6.7	The applicant	<b>Good design</b> To what extent would the proposed development provide 'many opportunities' in terms of built-in beneficial biodiversity or geological features, in accordance with 'good design' as noted in para 5.4.6 of NPS EN-1?
1.6.8	The applicant	<b>HRA</b> The conservation objectives and 'threats and pressures' for each European site considered in the HRA [APP-145] are shown in Tables 4-2 to 4-6. However, the current conservation status of the identified European sites has not been identified. Please provide this information for each European site considered in the HRA.
1.6.9	The applicant, NE	<b>HRA</b> The HRA [APP-145] does not currently state whether the European sites considered are in favourable or unfavourable condition. Can the applicant and NE confirm for each of the five European sites considered in the HRA, whether they are in favourable or unfavourable condition.
1.6.10	NE	<b>HRA</b> Since no site-specific conservation objectives have been published for Ramsar sites, the HRA [APP-145] applies the Humber Estuary Special Protection Area's (SPA) objectives to the Humber Estuary Ramsar site. Please confirm whether you are content with this approach.
1.6.11	NE	<b>HRA</b>



ExQ1	Question to:	Question:
		Please confirm whether you agree with the applicant's conclusions in respect of likely significant effects and adverse effects on integrity (AEol) for the European sites and features considered in the HRA [APP-145] which are not specifically referenced in your RR [RR-012].
1.6.12	The applicant	<p><b>HRA</b></p> <p>HRA Figure 4.1: European sites [APP-145] labels the Greater Wash SPA but does not display its location. Please amend the figure to clearly display the location of all the European sites described within the HRA.</p>
1.6.13	The applicant	<p><b>HRA</b></p> <p>Screening assessment tables have been provided within the HRA [APP-145] alongside a summary table of the screening assessment. However, these tables do not clearly detail the pathways of effect considered for each qualifying feature of the European sites. Furthermore, several of the pressures and threats for the screened in European sites (such as invasive species relating to the Humber Estuary Special Area of Conservation (SAC)) have not been addressed in the screening assessment. The screening assessment should clearly set out which impact pathways apply to the relevant European sites, to which features and to which phase(s) of the proposed development. Where impact pathways have been screened out, robust justification should be provided.</p> <p>Accordingly, the ExA requests a summary table of all European sites and qualifying features and each pathway of effect considered at each HRA Stage (screening, appropriate assessment/ AEol, and the derogations, as applicable), for each phase of the proposed development (construction, operation and decommissioning, as relevant).</p>
1.6.14	The applicant	<p><b>HRA</b></p> <p>The HRA [APP-145] identifies European sites within a Zone of Influence (Zol) of 10km from the Order limits. Please provide a justification as to why the 10km Zol buffer utilised is considered sufficient.</p>
1.6.15	The applicant	<p><b>HRA</b></p> <p>The ExA will expect to see a detailed response (and the provision of assessments where relevant) from the applicant to NE's RR [RR-012], including items NE1a, NE1b, NE1c, NE1d, NE1e, NE1f, NE2a, NE2b, NE3 and NE4 of Part II Table 1.</p>

**ExQ1: 29 July 2025**

**Responses due by deadline 1: 27 August 2025**

ExQ1	Question to:	Question:
1.6.16	The applicant, NE, EA	<p><b>HRA</b></p> <p>Section 4.5 of the HRA [APP-145] scopes out degradation of habitats as a result of changes to water quality as a result of release of sediment from construction/ decommissioning activities (such as installation of culverts) and from spillage of chemicals or contaminants.</p> <p><u>To NE and the EA</u></p> <p>a) Please confirm whether you are content for the HRA to scope out this impact pathway.</p> <p><u>To the applicant</u></p> <p>In relation to this, please address items NE5, NE6a and NE6b, Part II Table 1 of NE's RR [RR-012].</p>
1.6.17	The applicant, NE	<p><b>HRA</b></p> <p>With regard to the HRA monitoring outlined within the oLEMP [PDA-018] and the HRA [APP-145], should provision be made for results to be provided to NE for review/ comment?</p>
1.6.18	The applicant	<p><b>Relevant representation - Natural England</b></p> <p>Noting concerns and outstanding matters in relation to biodiversity/ HRA matters, please respond in detail to all points raised by NE in its RR [RR-012].</p>
1.6.19	The applicant	<p><b>Relevant representation – Environment Agency</b></p> <p>Please respond in detail to relevant points in relation to biodiversity/ HRA matters raised by the EA in its RR [RR-005].</p>
1.6.20	The applicant	<p><b>Relevant representation – Yorkshire Wildlife Trust</b></p> <p>Noting concerns and outstanding matters in relation to biodiversity/ HRA matters, please respond in detail to all points raised by Yorkshire Wildlife Trust (YWT) in its RR [RR-017].</p>
<b>7. Climate</b>		
1.7.1	The applicant	<p><b>Assessment</b></p> <p>ES Chapter 8 Table 8-6 [APP-044] considers a moderate or major effect to be significant. However, ES Appendix 8.2 (climate change reliance assessment) paragraph 8.2.16 [APP-117] considers only major effects to be significant. The ExA notes that ES Appendix 8.2 Table 8.2.9 identifies some</p>

ExQ1	Question to:	Question:
		significance of effects to be moderate. Please clarify/ justify the difference in methodology of assessing effects in this regard.
1.7.2	The applicant	<b>Assessment</b> NPS EN-1 paragraph 5.3.4 (first bullet point) refers to a whole life greenhouse gas (GHG) assessment, including in respect of impacts from a change in land use. Please signpost to where this is considered in ES Chapter 8 [APP-044], and if not considered, please address this.
1.7.3	The applicant	<b>Transport of materials</b> ES Chapter 8 Table 8.9 [APP-044] reports that 14,115 tonnes of carbon dioxide equivalence (tCO <sub>2e</sub> ) (2% of construction total) would arise from the transportation of materials from the manufacturing site. Clarify the assumption that this is based on, noting that some RRs (including [RR-049]) suggest this may be from as far away as China, and if this would be the case, whether the reported figure accurately reflects this.
1.7.4	The applicant	<b>Baseline</b> Noting ES Chapter 8 paragraph 8.7.17 [APP-044], are you able to provide: <ul style="list-style-type: none"> <li>a) any other appropriate comparative baseline for energy producing infrastructure; and</li> <li>b) any comparative data of lifecycle GHG emissions/ savings for other solar farms of a similar size and scale to that of the proposed development?</li> </ul>
1.7.5	The applicant	<b>Mitigation</b> The ExA notes that 'with additional mitigation', the figure for total tCO <sub>2e</sub> emissions would be the same as 'without additional mitigation' (1,998,798 tCO <sub>2e</sub> ). Please clarify: <ul style="list-style-type: none"> <li>a) whether this is correct;</li> <li>b) if so, the reason for this; and</li> <li>c) whether there might be any other forms of mitigation which could be adopted to reduce the figure, such as sourcing components or a percentage of components from manufacturers locally, in the UK or from Europe?</li> </ul>
1.7.6	The applicant	<b>Effects</b> ES Chapter 8 [APP-044] sets out that the proposed development would emit 1,998,798 tCO <sub>2e</sub> over its lifecycle and would have a saving of around 4,100,000 tCO <sub>2e</sub> compared to gas-fired electricity

ExQ1	Question to:	Question:
		<p>generation (so as the ExA understands it, the actual benefit would be a net figure of around 4,100,000 tCO<sub>2</sub>e minus 1,998,798 tCO<sub>2</sub>e). Please clarify:</p> <p>a) How this compares to global emissions, which ES Chapter 8 indicates is the study area; and</p> <p>b) Against global emissions, how you reach the conclusion that the saving figure would be 'a significant beneficial effect' as reported?</p>
1.7.7	The applicant	<p><b>Carbon reduction plan</b></p> <p>The oCEMP Table 5.1 [APP-153] sets out that members of the supply chain would provide a carbon reduction plan where feasible.</p> <p>a) In what situations would it not be feasible and why;</p> <p>b) Should the need for this be secured in its own right in the dDCO; and</p> <p>c) Should the oOEMP [APP-154] and oDEMP [APP-155] also make provision for carbon reduction plans.</p>
1.7.8	The applicant	<p><b>GHG reduction strategy</b></p> <p>Following on from ExQ1.7.7, NPS EN-1 paragraph 5.3.7 seeks the submission of a GHG reduction strategy secured under the DCO. Please clarify how the proposed development would meet this requirement.</p>
1.7.9	The applicant	<p><b>Resilience</b></p> <p>Noting NPS EN-3 paragraph 2.4.11 and NPS-EN-5 paragraph 2.3.2, please signpost to where 'impact of higher temperatures' has been considered, or if not considered, please address this.</p>
1.7.10	The applicant	<p><b>Downstream GHG emissions</b></p> <p>Please direct the ExA to an assessment of downstream GHG emissions in respect of the proposed development following the recent cases of R (on the application of Finch on behalf of the Weald Action Group) v Surrey County Council [2024] UKSC 20 and Friends of the Earth Ltd and South Lakeland Action on Climate Change v SSLUHC [2024] EWHC 2349 (Admin). If necessary, please update the assessment in ES Chapter 8 [APP-044] to ensure that the implications of these judgments are addressed.</p>
<b>8. Cultural heritage</b>		
1.8.1	The applicant	<b>Archaeology</b>

ExQ1	Question to:	Question:
		Does the assessment of the construction of the solar PV infrastructure take into account potential compaction of any buried archaeology? If not, please address this.
1.8.2	The applicant	<p><b>Detailed Settings Impact Assessment</b></p> <p>Within the Detailed Settings Impact Assessment [APP-123], with reference to hedgerows in the vicinity of the Site of Meaux Cistercian Abbey scheduled monument the document notes at paragraph 4.1.9 that the site was visited in the summer months and that the hedgerows may not be as visually impactful during winter months.</p> <p>This paragraph is somewhat unclear as to the contribution the surrounding hedgerows provide outside of the summer months, particularly if they are a deciduous species. Please provide further comments on the above, including whether there could be the potential for greater impacts than those outlined in the Detailed Settings Impact Assessment in light of this.</p>
1.8.3	The applicant, ERYC	<p><b>Long Riston conservation area</b></p> <p>Given the proximity of the proposed development to the Long Riston conservation area (approximately 200m), please confirm why this designated heritage asset has not been included in the Detailed Settings Impact Assessment [APP-123]? Is ERYC content that the proposed development would preserve or enhance the character or appearance of the conservation area?</p>
1.8.4	The applicant	<p><b>Archaeology</b></p> <p>The outline Construction Traffic Management Plan (oCTMP) [APP-158] states that ‘Some internal access tracks will utilise protective membranes to protect tree root protection areas and archaeological remains, where required’.</p> <p>Please confirm whether the word ‘some’ should be removed, in the interests of clarity.</p>
1.8.5	The applicant	<p><b>Archaeological feature HA3</b></p> <p>The Archaeological Management Strategy [APP-162] identifies a possible sub-rectangular enclosure containing two ring ditches with a larger third ring ditch located immediately outside in Fields F6, F9, F10 and F11 (HA3). The document also proposes that the area would be subject to monitoring during groundworks for the installation of an access road and temporary compound. Please explain why these details are not included/ addressed in ES Chapter 9 [APP-045].</p>
1.8.6	ERYC, Historic England	<b>Scheduled monuments</b>

ExQ1	Question to:	Question:
		Please confirm whether you agree with the applicant's assessment in ES Chapter 9 Table 9-8 [APP-045] that there would be no change and therefore no effect on the setting and significance of the three scheduled monuments?
1.8.7	The applicant	<p><b>Operational effects</b></p> <p>At paragraph 5.1.3 of the Detailed Settings Impact Assessment [APP-123], it states that there is anticipated to be negative changes to the experiential settings of a number of heritage assets during the construction phase of the proposed development. It then states that these would be 'temporary and fully reversible, lasting as long as the operation of the solar farm (anticipated to be 40 years)'. In contrast, ES Chapter 9 [APP-045] concludes 'no change' and 'no effect' in relation to a number of the assets listed. Please clarify the differences between these two documents, including the extent to which the proposed mitigation would overcome the negative changes as outlined.</p>
<b>9. Land, soil and groundwater</b>		
1.9.1	The applicant	<p><b>Relevant representation – Environment Agency</b></p> <p>Noting concerns and outstanding matters in relation to flood risk, drainage, water supply, abstraction and soils and decommissioning, please respond in detail to all relevant points raised by the EA in its RR [RR-005].</p>
1.9.2	The applicant	<p><b>Food security</b></p> <p>Please respond to concerns raised in a number of RRs [including RR-039 and RR-049] regarding the impact of the proposed development on UK food security.</p>
1.9.3	The applicant	<p><b>Soil storage areas</b></p> <p>Whilst it is recognised that the oSMP [APP-159] references the need for soil storage in the form of topsoil and subsoil bunds, and the need to ensure that their locations satisfy a number of criteria, as outlined in paras 5.3.10-5.3.17, the locations are not provided. Please provide indicative locations for these soil storage areas.</p>
1.9.4	The applicant	<p><b>Livestock grazing</b></p> <p>Given the potential implications for the biodiversity mitigation strategy and biodiversity net gain, please provide further clarification regarding whether the appropriate infrastructure would be in place</p>

ExQ1	Question to:	Question:
		to support future livestock grazing, should landowners wish to utilise the land for this purpose. See also the RR from YWT in this regard [RR-017].
1.9.5	The applicant	<b>Best and most versatile agricultural land</b> ES Chapter 10 [APP-046] states at paragraph 10.5.31 that ‘Best and Most Versatile agricultural land accounts for approximately 35.1% of Land Areas B to F’. Please respond to concerns raised in RRs regarding non-compliance with NPS EN-3, in the context of paragraph 2.10.29 which states that ‘poorer quality land should be preferred to higher quality land avoiding the use of “Best and Most Versatile” agricultural land where possible.’
1.9.6	The applicant	<b>National Standards for sustainable drainage systems (SuDS)</b> Having regard to the recently published <a href="#">National Standards for SuDS</a> , please provide comment regarding the potential implications for the proposed development/ flood risk assessment, including the SuDS hierarchy at section 7.2 [APP-102].
1.9.7	The applicant	<b>Decommissioning</b> The oDEMP [APP-155] states that ‘it is assumed that all the below-ground cables would be left in situ to avoid unnecessary disturbance to the ground or to nearby human or ecological receptors, in accordance with Paragraph 2.10.69 of NPS EN-3’. Please confirm whether, noting NPS EN-3 paragraph 2.10.68 which sets out an expectation to dig up cabling, this would allow for the prior use of the land to continue, including the potential for future degradation of cables and the subsequent potential for future contamination of the land?
1.9.8	EA	<b>Updated FRA</b> The applicant submitted an updated FRA at Procedural Deadline A [PDA-021 to PDA-028]. Please review this document and indicate, further to your RR [RR-005], whether you have any outstanding concerns.
<b>10.</b>	<b>Landscape and visual (including good design)</b>	
1.10.1	The applicant	<b>Worst-case scenario</b> ES Chapter 11 paragraph 11.4.8 [APP-047] states that as a worst-case, solar PV modules are modelled at 3m above ground. However, the Design Parameters Document [APP-150] states that some would be raised a ‘minimum of 300mm freeboard above the modelled 1-in-100 year plus climate change flood level (the design event flood level)’ to account for flood risk. Please clarify the

ExQ1	Question to:	Question:
		accuracy of the modelling and worst-case scenario in light of this (and for any other elements which may be raised for the same reason).
1.10.2	The applicant	<b>Glint and glare</b> The Glint and Glare Assessment [APP-100] (including Table 1 and paragraph 6.4.1) notes that the assessment has been undertaken on the assumption of solar PV panels having smooth glass with an anti-reflective coating. Should this be secured in the dDCO and/ or included within the Design Parameters Document (noting paragraph 2.10.134 of NPS EN-3)?
1.10.3	The applicant	<b>Glint and glare</b> The Glint and Glare Assessment [APP-100] is based on a tracker system only (Table 1). Explain to what extent this represents a worst-case scenario (for example, could fixed solar PV panels create additional effects for some receptors which would not be experienced with tracker panels)?
1.10.4	The applicant	<b>Glint and glare</b> Noting NPS EN-3 paragraph 2.10.106, has the potential for frames and supports in combination with the solar PV panels been considered in the Glint and Glare Assessment [APP-100]. If not, please explain the reason for this.
1.10.5	The applicant	<b>Glint and glare</b> The Glint and Glare Assessment [APP-100] notes on page 82 that NPS EN-3 paragraph 2.10.150 sets out that '[...] the Secretary of State should assess the potential impact of glint and glare on nearby homes, motorists, PRoWs, and aviation infrastructure (including aircraft departure and arrival flight paths).' Please clarify: <ul style="list-style-type: none"> <li>a) Whether and where impacts on PRoWs have been considered, and if not, provide justification for this; and</li> <li>b) Whether Beverley Airfield, Hill Farm Airfield and Burton-Constable Airfield were consulted on the application and, if not, justification for this.</li> </ul>
1.10.6	The applicant	<b>Design</b> Please explain, with reference to the Planning Inspectorate's <a href="#">advice on good design</a> , how you have considered opportunities to demonstrate good design in terms of siting of the various elements of the proposed development in order to mitigate their effects on the landscape. Please explain how



ExQ1	Question to:	Question:
		you propose to ensure that both the solar panels and associated/ ancillary development would contribute to the quality of the area.
1.10.7	The applicant	<b>Design</b> Do you have a design champion within your organisation designated to the proposed development, and if so, what are their qualifications for such a role and what is their hierarchical position within the organisation?
1.10.8	ERYC	<b>Design</b> Are you satisfied that you have sufficient design expertise to ensure good design of the proposed development in respect of discharging R3 of the dDCO [PDA-012], should development consent be granted?
1.10.9	The applicant, ERYC	<b>Design parameters</b> For the BESS, the Design Parameters Document [APP-150] states that containers would be 'light grey, white, dark green or similar in colour'. <u>To the applicant</u> a) Please clarify what 'or similar in colour' means in this context and consider whether these words need amending to ensure greater precision in this regard; and b) Provide your view as to whether [APP-150] should make provision for all BESS containers to be the same colour? <u>To ERYC</u> c) Please provide your view on the matter and whether you have any preference for use of colour.
1.10.10	The applicant	<b>Design parameters</b> For clarity, please define 'm <sup>2</sup> ' as 'square metres' in the Design Parameters Document [APP-150].
1.10.11	The applicant	<b>Indicative layout/ design parameters</b> Regarding the Indicative Layouts and Cross Section Plan [APP-015]: a) Is there any difference between the inverter building information shown on pages 3 and 4; b) Page 5 appears to show the indicative layout of a 'hybrid pack' which includes battery containers, an inverter container and DC-DC converters (with indicative locations of hybrid packs shown on

ExQ1	Question to:	Question:
		<p>the Indicative Operational Layout Plan [APP-055]) – please clarify locations and numbers of the ‘switchgear’ units shown on page 6;</p> <p>c) Page 5 indicates that the DC-DC converters would be 1.2m in width, whereas the Design Parameters Document [APP-150] suggests these would be 0.9m in width - please double check all dimensions stated in these two documents for consistency and amend as necessary.</p>
1.10.12	The applicant	<p><b>Security measures</b></p> <p>Noting NPS EN-3 paragraphs 2.10.48, 2.10.99 and 2.10.132 (and point 9 of [RR-021]), what consideration has been given to security measures, such a fencing, to minimise adverse landscape and visual effects.</p>
1.10.13	The applicant, ERYC	<p><b>Trees</b></p> <p>The AIA [APP-115] identifies trees to be retained and their root protection areas. It also, at paragraph 4.3.3 and section 5, notes that an arboricultural method statement (AMS) and tree protection details would be required prior to construction. The oCEMP [APP-153] also identifies the need for an AMS and tree protection measures. Should these form part of a detailed CEMP to be approved by the local planning authority under R4 of the dDCO rather than a document simply to be produced for the principal contractor?</p>
1.10.14	The applicant	<p><b>Trees</b></p> <p>The AIA Appendix A [APP-115] identifies G233 comprising of around 90 ‘category A’ trees. The extents of G233 are shown on Appendix B drawing number 8. AIA Table 2 appears to suggest the removal of around 90 trees from G233. However, Appendix C sheet 10 appears to show only a small part of G233 proposed for removal. Please clarify this matter.</p>
1.10.15	The applicant	<p><b>Hedgerows</b></p> <p>The Indicative Environmental Masterplan (sheet 10) [APP-058] appears to identify the retention and protection of a hedgerow between areas E15 and E16, whereas the Tree Preservation Order and Hedgerow Plan (sheet 10) [PDA-007] appears to show this hedgerow (H048) as being removed. Furthermore, this hedgerow appears to be considerably greater in length than the 8m as suggested in Schedule 13, Part 2 of the dDCO. The same issues appear to be the case for hedgerows H043 and H050 (and others). Please clarify these matters and ensure consistency between all plans (and the dDCO).</p>

ExQ1	Question to:	Question:
1.10.16	The applicant	<p><b>Veteran trees</b></p> <p>The ExA recognises that you have sought to keep internal access tracks to the edges of fields. However, an access track is proposed within the root protection area (RPA) of veteran tree T381.</p> <p>a) Explain how the proposed development accords with NE/ Forestry Commission <a href="#">standing advice/ guidance</a> in this regard, particularly in respect of avoiding and reducing (mitigating) impacts; and</p> <p>b) Clarify the types/ weights of vehicles which would use this access track (whether HGVs/ AIL) and the extent to which a no dig/ cellular system (as proposed in the AIA [APP-115]) would be sufficient to prevent the compaction of the roots of this tree as a result of such vehicle movements.</p>
1.10.17	The applicant	<p><b>Veteran trees</b></p> <p>The AIA Table 2 [APP-115] does not list and thus identifies no impacts on veteran tree T428. Paragraph 4.2.6 of the AIA suggests works, including a proposed passing place, would be outside of its RPA. However, the tree constraints plan appears to show that there might be some encroachment of the proposed passing place into the RPA (albeit where this extends to the opposite side of the lane). Please clarify the potential for impacts on this tree due to such works, and whether any mitigation is necessary.</p>
1.10.18	The applicant	<p><b>Ancient woodland</b></p> <p>The proposed solar arrays would appear to be more than 15m from the ancient woodland within Cote Wood LWS in line with NE/ Forestry Commission standing advice/ guidance. However, it is unclear to the ExA whether this would be the case for the proposed permissive path as shown on the Indicative Environmental Masterplan [APP-058] and the ExA notes that the surfacing of this would be determined later, as per oLEMP paragraph 16.3.3 [PDA-018]. To the north of the ancient woodland, the permissive path would appear to follow an existing access track, and to the west would appear to be beyond a drainage channel. Please clarify that this would be the case and any implications for the ancient woodland should the permissive path be within 15m of it.</p>
1.10.19	The applicant	<p><b>Lighting</b></p> <p>Some RRs (such as [RR-039 and RR-049] refer to the area being in a location for 'dark skies' and the need to protect such areas. Please address/ respond to this point.</p>
1.10.20	The applicant	<p><b>Offset distances</b></p>

ExQ1	Question to:	Question:
		<p>Weel Solar Action Group [RR-024] suggests 'buffer zones' of 20m from footpaths and roads to accommodate appropriate screening. The ExA notes that the applicant is proposing a 10m offset of proposed solar panels from PRowS (Table 11-10 of [APP-047]).</p> <p>a) Please further justify the adequacy of the proposed 10m offset from PRowS from a landscape and visual perspective and explain any implications for increasing these in size as per the suggestion in [RR-024]; and</p> <p>b) Clarify whether there are any proposed offset distances from local roads and if not, the reasons for this.</p>
1.10.21	The applicant	<p><b>Orchards</b></p> <p>The oLEMP [PDA-018] indicates that 'orchards', details of which would be confirmed post any consent in a LEMP, would be planted on the 'community accessible land'. Please clarify:</p> <p>a) The extent to which orchards would reflect the landscape character of the area;</p> <p>b) The extent to which a minimum of five trees (oLEMP Table 5-1) would equate to an 'orchard'; and</p> <p>c) Notwithstanding oLEMP paragraphs 16.1.5 to 16.1.7, provide further details on the proposed management of 'orchards', noting for example, that if they are to offer 'a good range of fruits to eat and to cook with', it is likely that these would need to be reachable to be picked by the public.</p>
1.10.22	The applicant	<p><b>Environmental Features Plan</b></p> <p>Please clarify what the series of green dashes to the west of the river Hull on sheet 13 of the Environmental Features Plan [APP-054] represent, as it is unclear from the key. Please also clarify whether the features would be affected by the proposed development.</p>
1.10.23	The applicant	<p><b>Landscape character</b></p> <p>Please respond to concerns raised in RRs (such as [RR-002, RR-019 and RR-027]) stating that the proposed development would contribute to the 'industrialisation of the landscape'.</p>
1.10.24	The applicant	<p><b>Mitigation</b></p> <p>Having regard to ES Chapter 11 paragraphs 11.9.292 and 11.9.391 [APP-047], please clarify why it is not considered possible to screen the western boundary of the field due its proximity to Meaux and Routh East Drain.</p>
1.10.25	The applicant	<p><b>Mitigation</b></p>

ExQ1	Question to:	Question:
		Noting NPS EN-1 paragraph 5.10.26, would there be scope to mitigate residual significant adverse landscape and visual effects with only a small reduction in the function of the proposed development?
1.10.26	The applicant, ERYC	<b>Decommissioning</b> The oDEMP [APP-155] makes only a brief reference to reinstatement of land, at paragraph 3.3.9. Would this be sufficient to secure appropriate reinstatement/ restoration of land under R15 of the dDCO [PDA-012]?
1.10.27	The applicant	<b>Decommissioning</b> ES Chapter 11 paragraph 11.9.439 [APP-047] notes that the two proposed on-site substations would be left in situ and not removed as part of the decommissioning phase. a) Please explain the reason for this; and Clarify any potential permanent adverse landscape and/ or visual effects, noting the zone of theoretical visibility of these [APP-074].
1.10.28	The applicant	<b>Cumulative</b> ES Appendix 15.2 paragraph 3.7.3 [APP-144] identifies four receptors (LCA 18A: River Hull Corridor, LCA 19D: Central Holderness Open Farmland, PRoW Tickton bridleway No.5 and Tickton PRoW located between Tickton and Weel) which would experience greater cumulative effects if the proposed development and all the identified other existing and/ or approved solar farms (set out in paragraph 1.1.1) were built. Please clarify, in light of this: a) The reason LCA 18A: River Hull Corridor is not included in the summary at paragraph 3.8.3; b) The reason, in paragraph 3.8.3, it concludes no greater cumulative effects for LCA 19D: Central Holderness Open Farmland; c) The reason Tickton PRoW located between Tickton and Weel is not included in the summary paragraph 3.8.4; d) The relationship/ intended difference between information presented in paragraph 3.7.3 and summary paragraphs 3.8.3/ 3.8.4; and e) Further to the above, it would assist the ExA's understanding and would assist with cross-referencing if the relevant significant cumulative effects as presented in ES Appendix 15.2 could be provided in a table, or, if they already have been, please signpost the ExA to this.

## ExQ1: 29 July 2025

Responses due by deadline 1: 27 August 2025

ExQ1	Question to:	Question:
		(Please also note ExQ1.14.2 relating to 'other existing and/ or approved' solar farms).
<b>11. Noise and vibration</b>		
1.11.1	ERYC	<b>Noise</b> Please confirm that you are content that all reasonable steps have been taken by the applicant to minimise adverse noise effects?
1.11.2	The applicant	<b>Construction compounds</b> Please provide information regarding whether the construction noise predictions take into account the locations of the proposed construction compounds, as activities may be concentrated in these locations.
1.11.3	The applicant	<b>Peace and tranquillity</b> Please respond to concerns raised in RRs [such as RR-039] regarding 'more permanent' impacts on the peace and tranquillity of the area, including mechanical noise from panels (should tracking arrays be used), noise from inverters and BESS.
1.11.4	The applicant	<b>Mitigation</b> ES Chapter 12 paragraph 12.8.16/ 12.8.17 and Table 12-14 [APP-048] indicate that noise barriers would be used during operation (including maintenance) in respect of substations and some hybrid packs. This does not appear to be included in oOEMP Table 5-1 [APP-154] under the 'Noise and vibration' section. Please signpost to where this would be secured, or if not secured, add to Table 5-1.
1.11.5	The applicant	<b>Monitoring</b> ES Chapter 12 Table 12-14 [APP-048] sets out requirements for 'Targeted noise monitoring at sensitive receptors' during construction and decommissioning (and in respect of vibration during construction). These measures appear to be included in oCEMP Table 5-1 and oDEMP Table 4-1. However, should targeted noise monitoring at sensitive locations and, as cited in ES Chapter 12 Table 12-14, verification of plant noise measurements, be included in Table 5-1 the oOEMP [APP-154]?
<b>12. Population</b>		
1.12.1	The applicant	<b>Equality, diversity and inclusion</b>

ExQ1	Question to:	Question:
		Please provide details regarding how equality, diversity and inclusion matters have been taken into account in the assessment of socio-economic effects.
1.12.2	The applicant	<b>Supply chain</b> Please provide information regarding the proportion of the construction materials (for example the solar PV panels) which would be sourced locally and whether they could contribute to the local supply chain.
1.12.3	The applicant	<b>Vulnerable and disadvantaged populations</b> Please confirm what approach has been taken regarding the assessment of effects on vulnerable and disadvantaged populations?
1.12.4	The applicant	<b>Mental health and wellbeing</b> ES Chapter 13 [APP-049] makes no specific assessment regarding the effect of the change in landscape character as a result of the proposed development (paragraph 13.7.30). Please comment on the effect of changes to the landscape on the mental health and wellbeing of the local population (such as described in RRs [RR-027 and RR-048]).
1.12.5	The applicant	<b>Public rights of way</b> Whilst it is noted in ES Chapter 13 [APP-049] that restrictions and closures would be required for a number of PRowS, please confirm why closures would be required rather than restrictions, including whether all options for diversion or restriction have been adequately considered? In addition, ES Chapter 13 paragraphs 13.7.1 to 13.7.2 state that the closures would be 'temporary' and of a 'short duration'. Please provide more specific timescale parameters for these closures?
1.12.6	Humberside Fire and Rescue Service	<b>Outline Battery Safety Management Plan (oBSMP)</b> Please confirm whether you are content with details and measures provided in the oBSMP [APP-157]. If not, provide details of what additions you consider need to be included.
1.12.7	The applicant	<b>Jobs</b> ES Chapter 13 [APP-049] references tenant farmers and two job losses. Please confirm which farms/ tenant farmers would be affected, and whether these are shown on any accompanying figures?
1.12.8	The applicant	<b>Community liaison</b>

ExQ1	Question to:	Question:
		Please provide further details regarding the Community Liaison Group – as referenced in the oCEMP [APP-153], including who would be included and how this would be secured.
1.12.9	The applicant	<b>Businesses</b> [RR-041] raises a concern around effects on 'Riston Plants'. This is not identified as one of the businesses in ES Chapter 13 paragraph 13.5.27 [APP-049]. Please clarify the reason for this and any likely effects on 'Riston Plants' as necessary.
1.12.10	The applicant	<b>Businesses</b> Please address the concerns raised in Hall Farm Wind Farm's submission [PDA-030] and, if known, identify where this wind farm connects to the grid.
<b>13. Transport and access</b>		
1.13.1	The applicant	<b>Public rights of way</b> ES Chapter 14: Transport and Access [APP-050] (such as at paragraph 14.4.69) suggests that PRoW users are considered in the assessment. However, the only PRoW mentioned is in paragraph 14.6.5 with reference to '[...] Skidby Footpath No. 17, which is outlined in Table 14-12 below.' This footpath is not mentioned elsewhere in ES Chapter 14 and Table 14-12 is above this reference and does not appear to relate to specific footpaths. Clarify where ES Chapter 14 assesses PRoW as it suggests, as it appears to the ExA that effects on PRoW are rather dealt with in ES Chapter 13: Population [APP-049], albeit there is no apparent mention of 'Skidby Footpath No. 17' in ES Chapter 13.
1.13.2	The applicant, ERYC	<b>Swept paths</b> The oCTMP at paragraph 5.1.4 [APP-158] indicates that further specialist surveys for large loads (ALLs) would be required along Meaux Lane to determine whether movements of such vehicles could be carried out. Given that such movements are likely to be required, please explain: <ol style="list-style-type: none"> <li>Why such surveys have not already been undertaken;</li> <li>What the likelihood is that such movements would be possible;</li> <li>Why this appears to be contrary to paragraph 5.1.3 which indicates that swept path surveys for large loads have been undertaken and are shown to be sufficient; and</li> <li>What the implications would be for the construction of the proposed development should future specialist surveys conclude that such movements are not possible?</li> </ol>



ExQ1	Question to:	Question:
1.13.3	The applicant	<p><b>Indicative Environmental Masterplan</b></p> <p>The key for this plan [APP-058] shows proposed internal tracks as coloured brown. However, the plan shows areas of grey, which appear to be proposed internal tracks. Please confirm if this is correct, and amend as necessary in the interests of clarity.</p>
1.13.4	The applicant	<p><b>Street alterations</b></p> <p>The SoR [PDA-014] indicates that Plot 2-8 would be required to facilitate access, and the Indicative Environmental Masterplan [APP-058] indicates a hedge would be removed and reinstated in this plot, seemingly to widen this part of the road at the bend. However, the Streets, Rights of Way and Access Plans [PDA-005] do not appear to identify any proposed alterations in this area. Please clarify and ensure consistency between all plans and documents (and the dDCO) as necessary.</p>
1.13.5	The applicant, ERYC	<p><b>oCTMP</b></p> <p>oCTMP Paragraph 4.1.6 [APP-158] notes that HGVs would access Meaux Lane from the north via the A1035 despite a 7.5 tonne weight restriction. Would HGVs be more than this weight and if so, please explain how it would be feasible to use this route (and others), addressing NPS EN-3 paragraph 2.10.125 (the same applies to AILs). Is ERYC agreeable to this?</p>
1.13.6	The applicant	<p><b>oCTMP</b></p> <p>Appendix 3 of the oCTMP [APP-158] and ES Figure 14.2 [APP-090] show HGV routes as green lines. Please clarify:</p> <ul style="list-style-type: none"> <li>a) Why the route along the A165 (between the Arnold Lane West junction and the Balk Lane junction) stops abruptly at Balk Lane; and</li> <li>b) Why there is no connection route shown between the green line along the A1174 Hull Road and the green line along Long Lane.</li> </ul>
1.13.7	The applicant	<p><b>oCTMP</b></p> <p>Please clarify in respect of the oCTMP [APP-158]:</p> <ul style="list-style-type: none"> <li>a) Why paragraph 7.16 (third bullet point) refers to 'permanent closure' (including in respect of roads) when none are cited in Schedule 5 of the dDCO; and</li> <li>b) Why paragraph 6.1.9 appears to refer to 'off peak single lane closures' along Arnold Lane West/ Black Tup Lane when none are cited in Schedule 5 of the dDCO (with Meaux Lane being the</li> </ul>

ExQ1	Question to:	Question:
		only road in Schedule 5 of the dDCO [PDA-012] and shown on the Streets, Rights of Way and Access Plans [PDA-005] as being subject to closure/ restriction).
1.13.8	ERYC	<p><b>HGVs along Park Lane</b></p> <p>The applicant's document Potential Main Issues for Examination on pages 15-17 [APP-148] indicates ERYC's concern (in red, as being a fundamental disagreement which is unlikely to be resolved during examination) around HGV movements along Park Lane and has provided a response to this. The ExA also understands that the Hornsea Four Offshore Wind Farm project has been discontinued. Please confirm:</p> <ol style="list-style-type: none"> <li>Whether you are satisfied with the applicant's response in [APP-148], including in light of the status of the discontinued project, and if not, explain your reasons; and</li> <li>Whether you are satisfied with the applicant's transport assessment [APP-138] and overall conclusions of ES Chapter 14 [APP-050].</li> </ol>
1.13.9	The applicant	<p><b>Passing places</b></p> <p>ES Chapter 14 Table 14-1 [APP-050] indicates that passing places would likely be retained for adoption by ERYC as the relevant highway authority. Please clarify:</p> <ol style="list-style-type: none"> <li>Whether this been confirmed by ERYC; and</li> <li>Whether passing spaces would be retained permanently, noting that this appears to be the case in the dDCO, though entry 'ERYC4' in [APP-148] suggests that effects would be 'temporary and fully reversible'.</li> </ol>
1.13.10	The applicant	<p><b>Construction traffic management</b></p> <p>Some RRs (such as [RR-035, RR-041 and RR-042]) raise concerns around construction access/ traffic and the implications for this on other users of access routes and business. Please explain how construction traffic along access routes, such as Carr Lane (Long Riston), would be managed to minimise any conflict in this regard and clarify the likely number and duration of vehicle movements along Carr Lane (Long Riston) during construction.</p>
1.13.11	The applicant	<p><b>Construction access</b></p> <p>RRs [RR-040 and RR-050] raise concerns around proposed construction access along 'Green Lane' and suggest access from 'Beverley Road' or opposite Heron Lakes in Tickton would be more</p>

ExQ1	Question to:	Question:
		<p>appropriate. The ExA is unclear at this point which 'Green Lane' the RRs are referring to, however, please clarify:</p> <ul style="list-style-type: none"> <li>a) Whether consideration was given to direct construction access from along the A1035 thus avoiding minor roads;</li> <li>b) If not, the reason for this; and</li> <li>c) If so, why this was discounted.</li> </ul>
1.13.12	The applicant	<p><b>Daily trip generation – construction</b></p> <p>There appears to be some discrepancies between the information in Table 14-6 of ES Chapter 14 [APP-150] and Table 6.3 of ES Appendix 14.1: Transport Assessment [APP-138], in terms of the numbering for the months for phases 3 to 5 (as is also the case for the oCTMP paragraph 3.1.1 [APP-158]) and the total vehicle number for phase 4. Please address this and any implications for the assessments.</p>
<b>14. Cumulative</b>		
1.14.1	The applicant	<p><b>Inter-project cumulative effects</b></p> <p>ES Chapter 15 paragraph 15.6.10 [APP-051] notes that Dogger Bank D Offshore Wind Farm could potentially give rise to inter-project cumulative effects but at the time of writing only the scoping report was available. Thus, the full extent of any cumulative effects is unknown. It goes on to say that ES Chapter 15 would be updated should further information become available. Is any further information available to enable the updating of ES Chapter 15 in this regard (noting that [RR-020] indicates that there is now a scoping opinion)?</p>
1.14.2	The applicant, ERYC	<p><b>Inter-project cumulative effects</b></p> <p>ES Chapter 15 [APP-051] and Appendix 15.2: Cumulative Landscape and Visual Impact Assessment [APP-144] cite the following 'existing and/ or approved' solar farms in consideration of cumulative effects: Kenley House Solar Farm (ERYC ref 22/01208/STPLF), Field House Solar Farm (ERYC ref 22/00824/STPLF), Creyke Beck Solar Farm (ERYC ref 21/02335/STPLF), Turf Carr Solar Farm (ERYC ref 22/02775/STPLF) and Carr Farm Solar Farm (ERYC ref 22/03648/STPLF).</p> <ul style="list-style-type: none"> <li>a) Please clarify whether these five solar farms are 'existing and approved' (implemented) or 'approved' (not yet implemented) (the ExA notes that entry 79 in ES Appendix 15.1 [APP-143] cites the status of Carr Farm Solar Farm as 'pending consideration' whereas entry 14 in ES Chapter 15 Table 15-3 cites it as having been refused);</li> </ul>

ExQ1	Question to:	Question:
		<p>b) If 'approved' and not yet implemented, please provide the date of approval of the solar farms and confirmation that approval (planning permission) remains extant;</p> <p>c) If Carr Farm Solar Farm has been refused planning permission, please comment on any implications for its inclusion in the cumulative assessment (the ExA notes that some RRs (such as [RR-024]) suggest that the application is subject to an appeal); and</p> <p>d) Weel Solar Action Group [RR-024] refers to a possible application for 'Drove Lane Solar Farm' – please comment on any implications of this for the cumulative assessment.</p>
1.14.3	The applicant	<p><b>Inter-project cumulative effects</b></p> <p>It is the ExA's understanding that the Hornsea Four Offshore Wind Farm project has been discontinued. Does this have any implications for the cumulative assessment?</p>
1.14.4	The applicant	<p><b>Inter-project cumulative effects</b></p> <p>ES Chapter 15 (entry 16 in Table 15-8) [APP-051] notes that the construction of the onshore cable route for the proposed Dogger Bank South Offshore Wind Farms project (which runs through Land Area B) would be unlikely to occur at the same time as the construction of the proposed development. Please clarify:</p> <p>a) the reason for this assumption;</p> <p>b) any implications were the proposed development to be completed and operational before the Dogger Bank South Offshore Wind Farms project cable route were to be constructed; and</p> <p>c) whether the applicant is co-ordinating with the promoters of the Dogger Bank South Offshore Wind Farms project on the matter?</p>
1.14.5	The applicant	<p><b>Intra-project combined effects</b></p> <p>The titles of ES Chapter 15 Table 15-6 and Table 15.7 [APP-051] refer to intra-project combined effects. However, in the significance of effect column in both tables, repeated reference is made to 'intra cumulative effects'. Please clarify whether this should instead refer to 'intra-project combined effects' (and that the ExA is thus using the correct terminology in the following ExQs)?</p>
1.14.6	The applicant	<p><b>Intra-project combined effects</b></p> <p>ES Chapter 15 Table 15-6 and paragraph 15.6.3 [APP-051] notes likely intra-project combined effects (from air quality and noise and vibration) during construction and decommissioning for receptors at Carr House Farm (Long Riston), Meaux Decoy Farm, Meaux (North), Arnold Carr Farm</p>

ExQ1: 29 July 2025

Responses due by deadline 1: 27 August 2025

ExQ1	Question to:	Question:
		and Springdale Farm. It is stated that these would be short-term and temporary. Please clarify the length of time 'short-term' would mean in this context.
1.14.7	The applicant	<b>Intra-project combined effects</b> ES Chapter 15 Table 15-6 and paragraph 15.6.3 [APP-051] (in respect of Riston footpaths No.1 and No. 2) identify significant adverse intra-project combined effects during construction and decommissioning from changes in the view and temporary diversions to these PRoW. The table also notes temporary diversions to other footpaths. However, ES Chapter 13: Population paragraphs 13.9.1 and 13.9.2 [APP-049] states that there would be no temporary diversions to footpaths. Please explain this apparent contradiction.