



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 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:

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



R	requirement	SoS	secretary of state
RPA	root protection area	SPA	Special Protection Area
RR	relevant representation	SU	statutory undertaker
s	section	tCO₂e	tonnes of carbon dioxide equivalent
SAC	Special Area of Conservation	TP	temporary possession
Sch	schedule	YWT	Yorkshire Wildlife Trust
SoR	Statement of Reasons	ZoI	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)	Local Plan 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? The East Riding Local Plan Update was adopted on 2nd April 2025 when it became part of the development plan, superseding the East Riding Local Plan 2016. The applicant has referred to both documents within their planning statement and carried out an assessment of the relevant policies. The adoption of the updated Local Plan does not have any implications for the proposed development to those considered by the applicant. A more detailed assessment of compliance with the Local Plan is set out in the Local Impact Report prepared by ERYC.
1.1.2	The applicant	National Policy Statements 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	Solar roadmap The Solar roadmap: United Kingdom powered by solar 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	Community benefit fund 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. ERYC welcome the community benefit fund. ERYC have not liaised with the applicant on this matter as it was understood that this was a voluntary contribution which sat outside of the DCO process.

ExQ1	Question to:	Question:
		Where possible ERYC would like to see this secured to ensure it materialises however understand that it is not a material planning consideration and therefore may not be possible to secure.
1.1.5	The applicant, ERYC	Planning history Would there be any implications for the projects/ applications listed in Planning Statement Table 2 [APP-147] should development consent be granted? The applicants description of projects/ applications listed in Table 2 of the Planning Statement are considered to be an accurate reflection of the proximity of these projects to the proposed development order limits. There is an overlap of developments in the vicinity of Creyke Beck substation, particularly with consent and proposed cable routes however it is expected that discussions between developers would ensure there is no conflict between these cable routes. As such there are not considered to be any implications for the already consented development identified in Table 2. Furthermore, cumulative assessments have been undertaken in which all relevant developments have been considered when assessing the impacts of the proposed development. The ERYC Nature Conservation Officer has however raised concerns in relation to enclosure of proposed mitigation land for Pear Tree Hill Plantation by solar PVs associated with Carr House Farm Solar. There will be a positive impact through joining up of SPA mitigation land with the Carr Farm Solar mitigation land.
1.1.6	The applicant	Grid connection 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 whether the grid connection agreement is reliant on any future extensions to the Creyke Beck substation.
1.1.7	The applicant	Grid connection 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:

ExQ1	Question to:	Question:
		a) the earliest date for connection; b) the latest date for connection (noting that the dDCO makes provision for a five-year commencement period); and 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).
1.1.8	ERYC	Assessments 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. The LIR responds to this question in detail.
2. Draft Development Consent Order (dDCO) and other consents		
Note: Questions/ comments relate to dDCO revision 3 [PDA-012] (clean)/ [PDA-013] (tracked)		
General		
1.2.1	The applicant	Contents page 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.
1.2.2	The applicant	Terminology 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	Terminology 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	Terminology

ExQ1	Question to:	Question:
		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	Cross referencing 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	Explanatory note (page 92 of the dDCO) 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)	Requirements 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. A requirement to secure the indicated biodiversity net gain is appropriate. Biodiversity net gain (1) No part of the authorised development may commence until a biodiversity net gain strategy has been submitted to and approved by the relevant planning authority for that part, in consultation with the relevant statutory nature conservation body. (2) The biodiversity net gain strategy must include details of how the strategy will secure a minimum of 10% biodiversity net gain in area-based habitat units, hedgerow units, and watercourse units for all of the authorised development during the operation of the authorised development, using the Department of Environment, Food and Rural Affairs' 4.0 Statutory Metric to calculate those

ExQ1	Question to:	Question:
		percentages (or such other biodiversity metric approved by the relevant planning authority in consultation with the relevant statutory nature conservation body). (3) The biodiversity net gain strategy must be fully implemented and maintained throughout the operation of the relevant part of the authorised development to which the plan relates for a minimum period of 30 years. Protected Species Surveys ERYC would anticipate these to be fully outlined and agreed in the oCEMP ahead of the DCO being granted. We reiterate that Table 5-1 of the oOEMP should include procedures for implementing, adapting and monitoring any protected species licences. Whilst not an additional requirement, ERYC would seek that Schedule 2 - Part 2 Procedure for Discharge of Requirements - further information regarding requirements - 21(2), be extended to allow a total of 21 days from receipt of a valid application for further information to be requested by the LPA. This would be in accordance with the statutory consultation period of 21 days.
Questions/ comments relating to articles (A)		
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.

ExQ1	Question to:	Question:
1.2.11	The applicant	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: 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; b) How such works could be construed to be within, or where they are shown as falling within the definition of the 'authorised development'; c) Examples of any other 'works' which may be required outside of the Order limits and the reasons for this; 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 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).
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 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]. 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?
1.2.14	The applicant	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

ExQ1	Question to:	Question:
		shown on the Works Plans and Land Plans [PDA-006] (and all other plans which show the Order limits). Given this: a) 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 b) Provide your view on the extent to which the application, if including this article in the dDCO, complies with s122 and s123 of PA2008.
1.2.15	The applicant	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.
1.2.16	The applicant	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.
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'?

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

ExQ1	Question to:	Question:
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 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

ExQ1	Question to:	Question:
		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?
Questions/ comments relating to Schedule (Sch) 2, Part 1 - requirements (R); and Sch 2, Part 2 – procedure for discharge of requirements		
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. ERYC welcome the undertaker consulting with relevant parties prior to the submission of details to the LPA for approval to ensure the details submitted are acceptable. The Council would however further consult the relevant consultees as standard practice when discharging conditions/requirements.
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.
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.

ExQ1	Question to:	Question:
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? ERYC note that suggested phases are identified within the application however the applicant has not confirmed that this is the phase the development would be constructed in. ERYC do not consider it necessary to require details of phasing as the impact on highway, biodiversity etc would be unchanged. Furthermore, with regard to the impact on the local community, the outline Construction Environment Management Plan includes a community liaison group in which a programme of community liaison will be carried out, including notification of works and details of the complaints process.
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? ERYC are satisfied that electrical cables are covered ‘drainage, water, power and communications cables and pipelines’
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)? ERYC would consult all relevant/necessary consultees as standard practice when discharging conditions/requirements.
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.

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

ExQ1	Question to:	Question:
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.
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.

ExQ1	Question to:	Question:
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.
Questions/ comments relating to other schedules		
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)?
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

ExQ1	Question to:	Question:
		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.
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 disappplied; 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 Parts 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.

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

ExQ1	Question to:	Question:
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; 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 c) whether any other made solar farm DCOs include a similar schedule.
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	Sch 11 – consider the following and amend as necessary: a) Part 2, paragraph 5(1)(a) – add 'and' after the semi-colon; b) Part 2, paragraph 6 – second to last definition add 'and' after the semi-colon; c) Part 2, Paragraph 6 – the final definition refers to 'sub-paragraph (1)', however, there is no such sub-paragraph in paragraph 6; d) Part 3 paragraph 7(1)(a) – add 'and' or 'or' as necessary after the semi-colon; and e) Part 4, paragraph 8(1)(a) – add 'and' or 'or' as necessary after the semi-colon.
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	Sch 12 – consider the following and amend as necessary: a) Part 2, paragraph 15(6) – add a full stop; b) Part 3, paragraph 17 "plans"- add 'and' after the semi-colon; c) Part 4, paragraph 26(2) "remote defence" - add 'and' after the semi-colon; and 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)).

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

ExQ1	Question to:	Question:
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.
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’.
Explanatory Memorandum (EM)		
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.

ExQ1	Question to:	Question:
3.	Compulsory acquisition (CA), temporary possession (TP) and related matters	
1.3.1	The applicant	Justification for CA 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	Justification for CA 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: a) Whether areas E13 and E14 (and other E-coded and relevant areas) are wholly for mitigation purposes; and 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.
1.3.3	The applicant	Justification for CA 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?
1.3.4	The applicant	Justification for CA 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.
1.3.5	The applicant	Plot 17-5 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

ExQ1	Question to:	Question:
		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?
1.3.6	The applicant	Plots 2-9, 2-10, 2-11 and 2-14 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.
1.3.7	The applicant	Schedule of negotiations and powers sought 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)?
1.3.8	The applicant	Schedule of negotiations and powers sought 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.
1.3.9	The applicant	Figham Common 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]. - Please clarify the above (noting that the EA [RR-005] suggests that HDD should be adopted under the whole of Figham Common); - 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 - 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.

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

ExQ1	Question to:	Question:
1.3.10	The applicant	Figham Common 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.
1.3.11	The applicant	Figham Common 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.
1.3.12	Beverley Pasture Masters	Figham Common 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.
1.3.13	Beverley Pasture Masters	Figham Common 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?
1.3.14	The applicant	Community accessible land 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.

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

ExQ1	Question to:	Question:
		a) 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); b) 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 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	Land Plans 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	Funding 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	Funding 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	Book of Reference The BoR [PDA-016] refers to 'Table 3-1' twice but there is no such table. Please address this.
1.3.19	The applicant	Book of Reference 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	Statement of Reasons

ExQ1	Question to:	Question:
		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	Statement of Reasons 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/ 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	Book of Reference and Land Plans 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	Advances in technology 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	Clarification Please confirm that there is no National Trust land within the Order limits.
1.3.25	The applicant	Land/ rights interests and BoR 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	Category 3 parties 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

ExQ1	Question to:	Question:
		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 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	Protective provisions <u>To NGTL</u> 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. <u>To the applicant</u> 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.
1.3.28	The applicant	Protective provisions 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.
1.3.29	The applicant, Northern Powergrid (Yorkshire) plc	Protective provisions 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

ExQ1	Question to:	Question:
		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.
1.3.30	The applicant, National Grid Electricity Transmission plc (NGET)	Protective provisions NGET [RR-010] requests protective provisions reflective of those in the Awel y Môr (AyM) Offshore Wind Farm Order 2023. <u>To the applicant</u> a) Confirm whether you intend to include similar protective provisions in the dDCO, and if not, explain your reasons. <u>To NGET</u> 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.
1.3.31	The applicant, EA	Protective provisions The applicant updated Schedule 12, Part 4 of the dDCO in respect of protective provisions for the EA. <u>To the EA</u> a) confirm whether you are content with the updated wording; 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); c) if not, please explain why and provide your preferred wording; and 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. <u>To the applicant and the EA</u> e) clarify the relevance of 'sea defence' matters as referred to in paragraph 26(2), given the inland location of the proposed development; and 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?

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

ExQ1	Question to:	Question:
1.3.32	The applicant, Yorkshire Water Services	Protective provisions <u>To Yorkshire Water Services</u> 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. <u>To the applicant</u> Please liaise with Yorkshire Water Services in respect of the contents of its RR [RR-016] and provide an update.
1.3.33	Beverley and North Holderness Internal Drainage Board (BNHIDB)	Protective provisions 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.
1.3.34	The applicant	S127/ s138 of the Planning Act 2008 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.
1.3.35	The applicant, ERYC	BoR 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? The BoR should be updated to reflect ERYC as local highway authority as owner/occupier of Plot 16-7. ERYC are not aware of any implications for the provisions of the dDCO that this change would have.

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

ExQ1	Question to:	Question:
1.3.36	The applicant, The Crown Estate	Crown land 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 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	Land rights 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	Lessees or tenants in the BoR 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 have been undertaken with them.
1.3.39	The applicant	Reasonable alternatives to CA 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	Negotiations 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.

ExQ1	Question to:	Question:
1.3.41	Affected persons	Potential inaccuracies 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.
1.3.42	Affected persons	Other concerns 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	Equalities Act 2010 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?
4. Need, site selection and alternatives		
1.4.1	The applicant	Output 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	Output per acre 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	Overplanting 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].

ExQ1	Question to:	Question:
		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); 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; c) Please explain how the proposed battery energy storage affects any requirements for overplanting; and 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.
1.4.4	The applicant	Grid connection 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: a) The reason for this date; b) Whether there is potential for this date to move forward to 2030 or earlier; and c) If not, to what extent the proposed development would contribute to meeting the aims of the Clean Power 2030 Action Plan.
1.4.5	The applicant	BESS 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?
1.4.6	The applicant	Design 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

ExQ1	Question to:	Question:
		approval) of the dDCO, defined in the dDCO and included as a certified document in Schedule 14 of the dDCO?
1.4.7	The applicant	Brownfield/ industrial land 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	Site selection 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	Alternatives to culverting Following on from ExQ1.4.8, and noting the EA's RR [RR-005], please explain: 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 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.
5. Air quality		
1.5.1	The applicant	Study area 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	Study area

ExQ1	Question to:	Question:
		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. 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	Study area 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).
1.5.4	The applicant	Study area 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].
1.5.5	The applicant	Assessment 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?
1.5.6	The applicant	Assessment 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 _{2.5} to enable a comparison of this against the annual average for the area. Please clarify the figure (or confirm whether it is '20µg/m ³ ' as per paragraph 6.5.3).

ExQ1	Question to:	Question:
1.5.7	The applicant	Human receptors 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: 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	Interim guidance Please address the government's PM_{2.5} Targets: Interim Planning Guidance and any implications this may have for the proposed development.
6. Biodiversity (including Habitats Regulations Assessment (HRA))		
1.6.1	The applicant	Bats – residual effect 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	Impact on owls/ birds of prey 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	Grassland under solar PV modules 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	Box culverts 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

ExQ1	Question to:	Question:
		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	Species protection plans 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	Horizontal directional drilling (HDD) and bentonite breakout 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	Good design 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	HRA 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	HRA 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	HRA

ExQ1	Question to:	Question:
		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	HRA 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	HRA 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.
1.6.13	The applicant	HRA 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. 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).
1.6.14	The applicant	HRA 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.

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

ExQ1	Question to:	Question:
1.6.15	The applicant	HRA 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.
1.6.16	The applicant, NE, EA	HRA 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. <u>To NE and the EA</u> a) Please confirm whether you are content for the HRA to scope out this impact pathway. <u>To the applicant</u> In relation to this, please address items NE5, NE6a and NE6b, Part II Table 1 of NE's RR [RR-012].
1.6.17	The applicant, NE	HRA 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?
1.6.18	The applicant	Relevant representation - Natural England 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].
1.6.19	The applicant	Relevant representation – Environment Agency Please respond in detail to relevant points in relation to biodiversity/ HRA matters raised by the EA in its RR [RR-005].
1.6.20	The applicant	Relevant representation – Yorkshire Wildlife Trust 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].
7.	Climate	

ExQ1	Question to:	Question:
1.7.1	The applicant	Assessment 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 significance of effects to be moderate. Please clarify/ justify the difference in methodology of assessing effects in this regard.
1.7.2	The applicant	Assessment 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	Transport of materials ES Chapter 8 Table 8.9 [APP-044] reports that 14,115 tonnes of carbon dioxide equivalence (tCO_{2e}) (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	Baseline Noting ES Chapter 8 paragraph 8.7.17 [APP-044], are you able to provide: a) any other appropriate comparative baseline for energy producing infrastructure; and 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?
1.7.5	The applicant	Mitigation The ExA notes that 'with additional mitigation', the figure for total tCO_{2e} emissions would be the same as 'without additional mitigation' (1,998,798 tCO_{2e}). Please clarify: a) whether this is correct; b) if so, the reason for this; and 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?

ExQ1	Question to:	Question:
1.7.6	The applicant	Effects ES Chapter 8 [APP-044] sets out that the proposed development would emit 1,998,798 tCO₂e over its lifecycle and would have a saving of around 4,100,000 tCO₂e compared to gas-fired electricity generation (so as the ExA understands it, the actual benefit would be a net figure of around 4,100,000 tCO₂e minus 1,998,798 tCO₂e). Please clarify: a) How this compares to global emissions, which ES Chapter 8 indicates is the study area; and b) Against global emissions, how you reach the conclusion that the saving figure would be ‘a significant beneficial effect’ as reported?
1.7.7	The applicant	Carbon reduction plan The oCEMP Table 5.1 [APP-153] sets out that members of the supply chain would provide a carbon reduction plan where feasible. a) In what situations would it not be feasible and why; b) Should the need for this be secured in its own right in the dDCO; and c) Should the oOEMP [APP-154] and oDEMP [APP-155] also make provision for carbon reduction plans.
1.7.8	The applicant	GHG reduction strategy 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.
1.7.9	The applicant	Resilience 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.
1.7.10	The applicant	Downstream GHG emissions 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

ExQ1	Question to:	Question:
		update the assessment in ES Chapter 8 [APP-044] to ensure that the implications of these judgments are addressed.
8. Cultural heritage		
1.8.1	The applicant	Archaeology 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	Detailed Settings Impact Assessment 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. 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.
1.8.3	The applicant, ERYC	Long Riston conservation area 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? The Long Riston Conservation Area, and the Church of St. Margaret located on its western edge, are located within c.500m of one parcel of the proposed development. The character of the former is defined by its surviving linear historic pattern, which runs sinuously for a considerable length. It is lined by buildings of generally one and half or two storeys, constructed in brick and historically roofed in slate. These historic properties form an attractive group, and also provide good evidence of the historic vernacular architecture of the East Riding. The wider setting of the conservation area is defined by its open landscape, subdivided by trees. This is legible when entering and exiting the conservation area from the north and south. Particularly to the north does

ExQ1	Question to:	Question:
		preserve the conservation areas wider setting. However, it is also relevant that the linear nature of the roads, and of the conservation area, means that key views into and out of the conservation area tend to be relatively channelled by the road network. From within the conservation area, this wider setting is not immediately legible, although the absence of visible development does help to reinforce the historic settlement plan of the village. The significance of the latter is defined by its exceptional architectural and visual interest, as it exhibits high quality decorative detailing and craftsmanship. It also has considerable evidential and historic value, providing evidence of the evolution of ecclesiastical architecture, as well as of the history of Long Riston. Its setting is defined by its relationship to the village, slightly set away to the west, with fields to the north and south, which preserve a sense of openness around the building. From an initial assessment, it was considered that the separation between the development and these two heritage assets was sufficient to avoid an impact on their significance. It is still considered that this is the case in relation to the Long Riston Conservation Area, as it is concluded that the parcel of land, while potentially visible in views leaving and entering the conservation area, is sufficiently separated for the heritage asset and the development to not be experienced in conjunction with each other. However, having considered the site further, it is noted that there would be a benefit to considering the impact of the development on the contribution made to the significance of the Church of St. Margaret by its wider setting, and appropriate mitigation measures that might be put in place to limit or avoid impact on this significance.
1.8.4	The applicant	Archaeology 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’. Please confirm whether the word ‘some’ should be removed, in the interests of clarity.
1.8.5	The applicant	Archaeological feature HA3 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,

ExQ1	Question to:	Question:
		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].
1.8.6	ERYC, Historic England	Scheduled monuments 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? The council's conservation team have assessed the impact of the development on the wider setting of the three Scheduled Monuments in Meaux where there was a potential to be affected by the development. This assessment agreed with the assessment made by the applicant in ES Chapter 9 Table 9-8 in relation to Meaux Duck Decoy and the Medieval Moated Tile Kiln, namely that there would be no impact. However, we disagreed with the assessment of the impact on the Site of Meaux Cistercian Abbey, albeit only to a minor degree. Rather than no impact, it was the council's conclusion that there would be a low level of change, a low effect and a low, less than substantial, impact on its significance. Our more detailed assessment of these assets is set out below. Site of the Meaux Cistercian Abbey- This is designated as a Scheduled Monument and covers the site of the monastic complex of twelfth and thirteenth century construction. The complex was considerable in scale, providing evidence of the wealth of the monastic order, the sophistication of ecclesiastical architecture and the social status of the church. Its abandonment post-Dissolution, coupled with the almost complete removal of the building stone that followed, means that its archaeology remains largely unencumbered by later development and hugely legible. It is therefore of exceptional significance, providing substantial evidence of the use, nature and function of the site, and therefore also wider evidence of the nation's ecclesiastical heritage. The abbey would have historically had considerable functional, political, and social interaction with its wider landscape, a landscape that now also preserves the wider isolated setting in which the Scheduled Monument is experienced. The wider setting of the asset therefore makes an important contribution to its significance, which also considerably derives from the surviving above and below ground remains of the monastic complex. However, how this wider setting is experienced from the asset varies, as from several

ExQ1	Question to:	Question:
		viewpoints the vegetation on the site, and hedgerow screening just beyond the site, creates a sense of enclosure. The supporting detailed setting assessment (ES Vol.4 Appendix 9.4) acknowledges that there will be notable impact during the construction phase, particularly audial effects of the increased volume and size of the traffic. We would agree with this assessment, although would dispute the supposition in paragraph 4.126 that the increase in lorry traffic 'may better index the auditory setting of the asset during the medieval period'. We would also suggest that the intensification of the use of the roads and the site will also have a negative effect on the positive contribution made by the historically and currently isolated character of its wider landscape. This will also likely have some impact during the operational phase of the development, in the isolated areas where there is intervisibility between the site and the Scheduled Monument. However, it is appreciated that the increased landscape buffer at the northern edge of area F and the existing hedgerows, will considerably minimise this impact. We therefore would not fully agree with the conclusions drawn in ES Chapter 9 Table 9-8 that there would be no change, no effect, and no impact on significance, but we would place this as being a low level of change, a low effect and a low, less than substantial, impact on its significance. Medieval moated tile kiln 250m north-east of North Grange Farm- This site is also designated as a Scheduled Monument and is a relatively rare survival of this typology. It operated in the thirteenth century, and it had an important historic interrelationship with the nearby Meaux Abbey. It also preserves important evidence of medieval industrial manufacturing. Its setting makes a limited contribution to its wider significance, although it does partly help to clarify the important interrelationship between the site and the adjacent abbey complex. There are therefore potential small impacts during the construction phase, although these would have a very limited potential effect on how the asset is understood and experienced, and they seem unlikely to diminish its significance. Any effects are concluded to be reversible and to pre-date the operational phase of the development. We would therefore agree with the conclusions drawn by the applicant's heritage expert in ES Chapter 9 and the detailed setting assessment.

ExQ1	Question to:	Question:
		Meaux Duck Decoy- This is a post-medieval monument, designed as a means by which to entrap ducks to allow for them to be killed for their feathers and for food. These are an important element in understanding the economic and social history of the area, as well as of our understanding of hunting and farming methods in the period. It is a comparatively rare survival, as changing land uses and modern drainage methods have destroyed many similar decoys. Accordingly, it is designated as a Scheduled Monument. The setting of the asset is now currently relatively contained by the surrounding vegetation, which is comparatively mature and overgrown. This curtails the environment in which it is experienced. There may be some relationship between the open setting of the asset and its function, inasmuch as it provides a logical benefit to the asset's function to have it located away from more built-up areas and for it be clearly visible from the air. However, it is not considered that the wider setting of the asset now makes a strong positive contribution to the significance of the asset. As such, it is not considered that the development will result in harm to the significance of the asset. We would therefore agree with the conclusions set out in Table 9-8 of ES Chapter 9.
1.8.7	The applicant	Operational effects 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.
9. Land, soil and groundwater		
1.9.1	The applicant	Relevant representation – Environment Agency 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].

ExQ1	Question to:	Question:
1.9.2	The applicant	Food security 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.
1.9.3	The applicant	Soil storage areas 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.
1.9.4	The applicant	Livestock grazing 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 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	Best and most versatile agricultural land 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	National Standards for sustainable drainage systems (SuDS) Having regard to the recently published National Standards for SuDS , 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	Decommissioning 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

ExQ1	Question to:	Question:
		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	Updated FRA 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.
10. Landscape and visual (including good design)		
1.10.1	The applicant	Worst-case scenario 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 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	Glint and glare 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	Glint and glare 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	Glint and glare 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	Glint and glare

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ExQ1	Question to:	Question:
		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, PRowers, and aviation infrastructure (including aircraft departure and arrival flight paths).' Please clarify: a) Whether and where impacts on PRowers have been considered, and if not, provide justification for this; and b) Whether Beverley Airfield, Hill Farm Airfield and Burton-Constable Airfield were consulted on the application and, if not, justification for this.
1.10.6	The applicant	Design Please explain, with reference to the Planning Inspectorate's advice on good design, 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 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	Design 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	Design 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? Further to internal technical consultees, ERYC have an internal design team in which we are satisfied we have sufficient design expertise when discharging R3 of the dDCO.
1.10.9	The applicant, ERYC	Design parameters 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>

ExQ1	Question to:	Question:
		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. It would be a preference of ERYC that for these more solid, bulky elements of the Solar Farm, the best way to proceed would be through the use of Environmental Colour Assessment (ECA). This technique establishes the naturally occurring colours within a landscape. This can be used to identify colours which would have a recessive, or camouflaging, effect on new structures within the landscape, enabling them to integrate with, rather than stand out from, their setting. ECA is carried out through an established process of using Natural Colour System (NCS) colour swatches on site and comparing background colours directly against the NCS colours. This is more appropriate, and landscape-specific, than simply referring to 'muted colours' in a RAL chart.
1.10.10	The applicant	Design parameters For clarity, please define 'm²' as 'square metres' in the Design Parameters Document [APP-150].
1.10.11	The applicant	Indicative layout/ design parameters 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 the Indicative Operational Layout Plan [APP-055]) – please clarify locations and numbers of the 'switchgear' units shown on page 6; 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.
1.10.12	The applicant	Security measures

ExQ1	Question to:	Question:
		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.
1.10.13	The applicant, ERYC	Trees 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? It would be appropriate for the AMS to form part of the CEMP given that tree protection measures are an integral part of the construction process.
1.10.14	The applicant	Trees 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.
1.10.15	The applicant	Hedgerows 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).
1.10.16	The applicant	Veteran trees 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. a) Explain how the proposed development accords with NE/ Forestry Commission standing advice/ guidance in this regard, particularly in respect of avoiding and reducing (mitigating) impacts; and

ExQ1	Question to:	Question:
		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.
1.10.17	The applicant	Veteran trees 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.
1.10.18	The applicant	Ancient woodland 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.
1.10.19	The applicant	Lighting 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.
1.10.20	The applicant	Offset distances 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]). 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

ExQ1	Question to:	Question:
		b) Clarify whether there are any proposed offset distances from local roads and if not, the reasons for this.
1.10.21	The applicant	Orchards 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: a) The extent to which orchards would reflect the landscape character of the area; b) The extent to which a minimum of five trees (oLEMP Table 5-1) would equate to an ‘orchard’; and 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.
1.10.22	The applicant	Environmental Features Plan 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.
1.10.23	The applicant	Landscape character 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’.
1.10.24	The applicant	Mitigation 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.
1.10.25	The applicant	Mitigation 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	Decommissioning

ExQ1	Question to:	Question:
		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]? ERYC are satisfied that 3.3.9 of the oDEMP would secure appropriate reinstatement/ restoration of land to its former condition. At para 1.1.6 of the oDEMP it states that one or several Decommissioning Environmental Management Plans may be produced and <i>“approved by the relevant Local Planning Authority in advance of the date of decommissioning for the relevant part of the Proposed Development”</i>. This would appear to provide an appropriate overview and control of the decommissioning process. Further information is however sought on timings within the oDEMP. Currently there is little certainty or requirement for the decommissioning to be completed, instead just commencing. ERYC would also like to see an addition to requirement 15.1 of the DCO in the event that the development ceases to export electricity to the grid for a continuous period of more than 12 months, then within 3 months from the end of that 12-month period, a DEMP shall be submitted for approval.
1.10.27	The applicant	Decommissioning 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	Cumulative 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:

ExQ1	Question to:	Question:
		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. (Please also note ExQ1.14.2 relating to 'other existing and/ or approved' solar farms).
11. Noise and vibration		
1.11.1	ERYC	Noise Please confirm that you are content that all reasonable steps have been taken by the applicant to minimise adverse noise effects? The Operational Noise Assessment raises some concerns (Environmental Statement Volume 4 Appendix 12.4: Operational Noise Assessment Details). A number of residential properties are identified where the noise impact/rating level of the development is predicted to be in excess of +10dB post-mitigation. As the assessment method used is BS4142:2019m this indicates potential 'significant adverse impact'. Whilst the rating levels are described as being below upper absolute thresholds (assumed here to refer to World Health Organisation guidance), it is recommended that additional or more robust mitigation measures are explored and installed to lower the noise impact on these properties as far as is reasonably practicable. In terms of ecological impacts ERYC are satisfied with regards to noise effects.
1.11.2	The applicant	Construction compounds 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.

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

ExQ1	Question to:	Question:
1.11.3	The applicant	Peace and tranquillity 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	Mitigation 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	Monitoring 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]?
12.	Population	
1.12.1	The applicant	Equality, diversity and inclusion 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	Supply chain 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	Vulnerable and disadvantaged populations Please confirm what approach has been taken regarding the assessment of effects on vulnerable and disadvantaged populations?

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

ExQ1	Question to:	Question:
1.12.4	The applicant	Mental health and wellbeing 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	Public rights of way 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	Outline Battery Safety Management Plan (oBSMP) 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	Jobs 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	Community liaison 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	Businesses [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	Businesses 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.

ExQ1	Question to:	Question:
13.	Transport and access	
1.13.1	The applicant	Public rights of way 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	Swept paths The oCTMP at paragraph 5.1.4 [APP-158] indicates that further specialist surveys for large loads (AILs) 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: - Why such surveys have not already been undertaken; - What the likelihood is that such movements would be possible; - 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 - What the implications would be for the construction of the proposed development should future specialist surveys conclude that such movements are not possible? At this moment in time, it is unknown what AIL's will be required, however at the time of a full CTMP being provided, as required by requirement 5 of the DCO, this information should be made available. It is not unusual for this information to be submitted at a later date. It typically requires full load details including weight and dimensions and also what type of vehicle is required to make the move. This takes significant information and a professional haulage company to review the route and provide ERYC with the information to be signed off. Depending on the formal details, it is likely that AILs can access the site with mitigation such as temporary localised widening, street furniture removal and other traffic management. Para 5.1.3 of the oCTMP (APP-158) state that large loads have been surveyed and it is understand this be the HGV routes which have bene surveyed and provided as part of the OCTMP documents.

ExQ1	Question to:	Question:
1.13.3	The applicant	Indicative Environmental Masterplan 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.
1.13.4	The applicant	Street alterations 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.
1.13.5	The applicant, ERYC	oCTMP 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? The proposed HGVS and any AILs are likely to be over the weight restriction, however the weight restriction applies to HGVs that are driving through the whole restricted area, allowing for deliveries to take place. The proposal also includes improvements such as localised widening to the route which would cater better for HGVs, this is shown in Appendix 4 of the Transport Assessment (APP-138).
1.13.6	The applicant	oCTMP Appendix 3 of the oCTMP [APP-158] and ES Figure 14.2 [APP-090] show HGV routes as green lines. Please clarify: - Why the route along the A165 (between the Arnold Lane West junction and the Balk Lane junction) stops abruptly at Balk Lane; and - Why there is no connection route shown between the green line along the A1174 Hull Road and the green line along Long Lane.

ExQ1	Question to:	Question:
1.13.7	The applicant	oCTMP Please clarify in respect of the oCTMP [APP-158]: 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 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 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	HGVs along Park Lane 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: a) 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 ERYC are not satisfied with the response given, especially given that the approved access from the A1079 remains to form part of a National Grid planning applications (24/03819/STPLF & 25/01898/STPLF) which are for Creyke Beck substation extension and a new substation. These applications will be subject to a pre-commencement condition to ensure that the A1079 access and access road is first built. Park Lane access would need to navigate Northgate which is often restricted due to parked cars, the very tight junction of Northgate/Park Lane which has limited visibility as well as no real junction radii, this is before taking into account Park Lane itself which is heavily residential at one end and single tack PROW towards Creyke Beck. b) Whether you are satisfied with the applicant's transport assessment [APP-138] and overall conclusions of ES Chapter 14 [APP-050]. ERYC are satisfied that the ES and Transport Assessment in terms of numbers and impacts on the highway network are robust, except for the use of Park Lane which is not acceptable. It is further

ExQ1	Question to:	Question:
		noted that TA states that the development would not be ready until Q3 of 2028, at which time it is anticipated that the A1079 access will be operational.
1.13.9	The applicant	Passing places 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: a) Whether this been confirmed by ERYC; and b) 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'.
1.13.10	The applicant	Construction traffic management 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.
1.13.11	The applicant	Construction access 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 appropriate. The ExA is unclear at this point which 'Green Lane' the RRs are referring to, however, please clarify: a) Whether consideration was given to direct construction access from along the A1035 thus avoiding minor roads; b) If not, the reason for this; and c) If so, why this was discounted.
1.13.12	The applicant	Daily trip generation – construction 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

ExQ1	Question to:	Question:
		[APP-158]) and the total vehicle number for phase 4. Please address this and any implications for the assessments.
14. Cumulative		
1.14.1	The applicant	Inter-project cumulative effects 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)?
1.14.2	The applicant, ERYC	Inter-project cumulative effects 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). 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); Kenley House Solar Farm - 22/01208/STPLF Approved 18.11.2022 understood to have not yet been implemented. Field House Solar Farm - 22/00824/STPLF Approved 08.07.2022, the permission has been implemented with a lawful start made however understood to not yet be operational. Creyke Beck Solar Farm - 21/02335/STPLF Approved 06.01.2022, the permission has been implemented with a lawful start made however understood to not yet be operational. Turf Carr Solar Farm - 22/02775/STPLF Approved 29.05.2024 understood to have not yet been implemented. Carr Farm Solar Farm 22/03648/STPLF - Approved not yet implemented

ExQ1	Question to:	Question:
		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; See response to (a) above 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 Carr Farm Solar Farm was allowed on appeal 18th July 2025 (APP/E2001/W/25/3360978). 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. The Council have not been involved in any pre-application discussion for this scheme. A planning application was validated 26/08/2025 for 'Installation of a solar farm comprising ground mounted solar PV panels with an installed capacity of 49.99MW AC including mounting system, transformer substations, underground cabling, fencing, CCTV, internal tracks and associated infrastructure, landscaping, biodiversity net gain and environmental enhancements for a temporary period of 40 years' reference number 25/02275/STPLF, site address Land East Of Kenley House Farm, Ferry Road, Wawne, HU7 5XY. ERYC have not had sufficient time to review the proposal and assess the cumulative impacts. As such, it is difficult to advise what the implications of this development for the cumulative assessment would be. Given the proximity to consented solar developments and the proposed Peartree Development subject to this DCO, there would be a cumulative landscape and visual impact. There is also the potential for a cumulative impact on biodiversity, loss of agricultural land, highway safety. To avoid any confusion with sites names and addresses, the site references used by the applicant relate to the following addresses. - Kenley House Solar Farm - 22/01208/STPLF Land North East And West Of Carr Plantation, Ferry Road, Wawne, East Riding Of Yorkshire, HU7 5XZ - Field House Solar Farm - 22/00824/STPLF Construction of solar photovoltaic development including solar panels, installation of sub-station, medium voltage power stations, battery energy storage containers, erection of perimeter fence and CCTV poles with associated access and erection of temporary construction compound

ExQ1	Question to:	Question:
		- Creyke Beck Solar Farm - 21/02335/STPLF Construction of a 49.9MW Solar Farm, underground cabling, 18 inverter substations, installation of perimeter fencing (up to 2.5m high) with access gates and 176 CCTV cameras/infra-red lighting on steel poles (up to 3.5m high steel poles) and 2 temporary construction compounds; construction of a grid compound consisting of substations, control rooms, transformers, cabling and fencing; construction of a storage compound consisting of 24 battery storage containers, 24 PCS units and 2.5m high perimeter fencing and associated grid infrastructure and associated works - Turf Carr Solar Farm - 22/02775/STPLF Construction of a 49.99MW Solar Farm comprising: ground mounted solar panels, transformers, substation, DNO control room, customer substation, GRP communications cabin, security fencing, landscaping and other associated infrastructures - Carr Farm Solar Farm 22/03648/STPLF Construction of 49.9MW Solar Farm comprising of ground mounted solar panels, underground cabling, a temporary construction compound, access tracks, perimeter fencing with CCTV cameras, access gates and associated ancillary grid infrastructure and work
1.14.3	The applicant	Inter-project cumulative effects 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?
1.14.4	The applicant	Inter-project cumulative effects 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: a) the reason for this assumption; 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 c) whether the applicant is co-ordinating with the promoters of the Dogger Bank South Offshore Wind Farms project on the matter?
1.14.5	The applicant	Intra-project combined effects

ExQ1	Question to:	Question:
		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)?
1.14.6	The applicant	Intra-project combined effects 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 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	Intra-project combined effects 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.

