RWE

Peartree Hill Solar Farm

Applicant's Responses to Relevant Representations

Planning Act 2008

Infrastructure Planning

(Applications: Prescribed Forms and Procedure) Regulations 2009 – Regulation 5(2)(q)

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Acronyms

Table 1-2: List of acronyms

Acronym	Definition
AC	Alternating Current
ALC	Agricultural Land Classification
ASNW	Ancient Semi Natural Woodland
ATV	Ancient and Veteran Trees
AYM DCO	Awel Y Mor Development Consent Order
BESS	Battery Energy Storage Systems
BMV	Best and Most Versatile
BNG	Biodiversity Net Gain
BSMP	Battery Safety Management Plan
BRE	Building Research Establishment
CCTV	Closed Circuit Television
CEMP	Construction Environmental Management Plan
CITB	Construction Industry Training Board
CPRENEY	CPRE North and East Yorkshire
CTMP	Construction Traffic Management Plan
dB	Decibel
DBD	Dogger Bank D Offshore Wind Farm
DC-DC	Direct Current to Direct Current (converter)
DCO	Development Consent Order
dDCO	Draft Development Consent Order
DEMP	Decommissioning Environmental Management Plan
EA	Environment Agency
ED	Environmental Product Declaration
EIA	Environmental Impact Assessment
EMF	Electromagnetic fields
EMI	Electromagnetic interference
EPR	Environmental Permitting Regulations
ERYC	East Riding of Yorkshire Council
ES	Environmental Statement
ESG	Environmental, Social, and Governance
FRA	Flood Risk Assessment

FRS	Fire and Rescue Services
GHG	Greenhouse Gas
GW	Gigawatt
ha	Hectare
HBMCE	Historic Buildings and Monuments Commission for England
HDD	Horizontal Directional Drilling
HGV	Heavy Goods Vehicle
HoT	Heads of Terms
HRA	Hydrogeological Risk Assessments
HRA	Habitats Regulation Assessment
HSE	Health and Safety Executive
IDB	Internal Drainage Board
IEMA	Institute of Environmental Management and Assessment
IP	Ingress Protection
JLAF	Joint Local Access Forum
kV	Kilovolt
LCA	Landscape Character Area
LCRM	Land Contamination Risk Management
LEMP	Landscape and Ecological Management Plan
LGV	Light Goods Vehicle
LIR	Local Impact Report
LIQ	Land Interest Questionnaire
LLFA	Lead Local Flood Authority
LVIA	Landscape and Visual Impact Assessment
LWS	Local Wildlife Sites
MVA	Megavolt-amperes
MW	Megawatt
MWp	Megawatt peak
NFCC	National Fire Chiefs Council.
NGET	National Grid Electricity Transmission
NGT	National Gas Transmission
NH	National Highways
NHHM	North Humber to High Marnham
NHLE	National Heritage List for England
NPG	Northern Powergrid
NPPF	National Planning Policy Framework

NPS	National Policy Statement
NSIP	Nationally Significant Infrastructure Project
NVC	National Vegetation Classification
oCEMP	Outline Construction Environmental Management Plan
oDEMP	Outline Decommissioning Environmental Management Plan
OEMP	Operational Environmental Management Plan
oOEMP	Outline Operational Environmental Management Plan
OFGEM	Office of Gas and Electricity Markets
OHID	Office for Health Improvement and Disparities
OHL	Overhead Power Lines
oLEMP	Outline Landscape and Ecological Management Plan
oSMP	Outline Soil Management Plan
oSMP	Outline Soil Management Plan
PAWS	Plantations on Ancient Woodland Sites
PEIR	Preliminary Environmental Impact Report
PRoW	Public Rights of Way
PV	Photovoltaic
RR	Relevant Representation
SAC	Special Area of Conservation
SEPA	Scotting Environment Protection Agency
sHRA	Shadow Habitats Regulations Assessment
SHU	Soil Handling Unit
SMP	Soil Management Plan
SoCG	Statement of Common Ground
SPA	Special Protection Area
SPZ	Source Protection Zone
SRN	Strategic Road Network
SSI	Solar Stewardship Initiative
SSSI	Sites of Special Scientific Interest
STW	Sewage Treatment Works
UKHSA	UK Health Security Agency
WFD	Water Framework Directive
WR	Written Representation
WSAG	Weel Solar Action Group
XLPE	Cross-Linked Polyethylene
YWS	Yorkshire Water Services

YWT	Yorkshire Wildlife Trust
ZTV	Zone of Theoretical Visibility

1 Introduction

1.1 Purpose of this report

1.1.1 The purpose of this report is to provide RWE Renewables UK Solar and Storage Ltd (the Applicant's) response to the matters raised in the Relevant Representations submitted by Interested Parties concerning the Peartree Hill Solar Farm (the Proposed Development).

1.1.2 The Development Consent Order (DCO) Application (the DCO Application) for the Proposed Development was submitted on Friday 21 February 2025 and subsequently accepted for Examination on Friday 21 March 2025. The window for submission of Relevant Representations by Interested Parties was open from Tuesday 8 April 2025 until Friday 30 May 2025. The Relevant Representations received during this period were published on the Planning Inspectorate's project website on Wednesday 4 June 2025.

1.1.3 A total of 51 responses were received within the Relevant Representation period. Additionally, on 3 June 2025, the Planning Inspectorate accepted a further submission from a member of the public. Although this submission was not assigned a separate Relevant Representation identification number, the individual had already submitted a representation, and this additional submission has therefore been treated as an extension of their original response.

1.2 Structure of this document

1.2.1 This report provides a response from the Applicant to the matters raised in the Relevant Representations and is structured as follows:

- Table 1-3 – Statutory Consultees
- Table 1-4 – Local Authorities
- Table 1-5 – Parish Councils
- Table 1-6 – Non-Statutory Organisations

1.2.2 Relevant Representations received by Statutory Consultees, Local Authorities, Parish Councils and Non-Statutory Organisations are presented as summarised versions of the responses taken from Relevant Representations and are then responded to by setting out the Applicant's position on the matter at the time of writing.

1.2.3 To increase the clarity of this report and avoid repetition, similar issues raised by Members of the Public have been grouped and summarised. The "Identification

Number" column in the tables refers to the reference assigned to each Relevant Representation in the Examination Library.

1.2.4 The documents submitted with the DCO Application are also referenced in this report, using the reference number [APP-X], where the numbers are the application documents number, as set out in the Examination Library. Interested Parties can search within this document using their allocated Representation Number (as provided within the Examination Library) to find a response to their Representation.

Table 1-3: List of Statutory Consultees who submitted Relevant Representations

ID Number	Statutory Consultees
RR-004	Beverley and North Holderness Internal Drainage Board
RR-005	Environment Agency
RR-006	Forestry Commission
RR-007	Historic England
RR-008	Humberside Police
RR-009	National Gas Transmission Limited
RR-010	National Grid Electricity Transmission Plc
RR-011	National Highways
RR-012	Natural England
RR-013	Network Rail Infrastructure Limited
RR-014	UK Health Security Agency
RR-015	Weightmans LLP on behalf of Northern Powergrid (Yorkshire) LLP
RR-016	Yorkshire Water Services
RR-022	Mining Remediation Authority

Table 1-4: List of Local Authorities who submitted Relevant Representations

ID Number	Statutory Consultees
RR-001	East Riding of Yorkshire Council

Table 1-5: List of Parish Councils who submitted Relevant Representations

ID Number	Parish Council
RR-002	Tickton and Routh Parish Council
RR-003	Watton Parish Council

Table 1-6: List of Non-Statutory Organisations who submitted Relevant Representations

ID Number	Non-Statutory Organisation
RR-017	Yorkshire Wildlife Trust
RR-018	Beverley Pasture Masters
RR-019	CPRE North and East Yorkshire
RR-020	Doggerbank Offshore Wind Farm Project 4 Projco Limited
RR-023	The British Horse Society
RR-024	Weel Solar Action Group
RR-021	East Riding of Yorkshire and Kingston upon Hull Joint Local Access Forum

1.2.5 For ease of reference, a table of acronyms used in this document is provided in **Table 1-2.**

2 Relevant Representations

2.1 Local authorities

2.1.1 The table below set out the responses to the Relevant Representations from local authorities and the response from the Applicant.

Table 2-1: East Riding of Yorkshire Council Relevant Representation

ID	Theme	Comment	Response
RR-001		East Riding of Yorkshire Council (ERYC) confirmed that as the host authority for the Peartree Hill Solar Farm DCO application, they are automatically an Interested Party under section 102(1)(c) of the Planning Act 2008 and do not need to register. They thanked the Planning Inspectorate for the opportunity to submit a Relevant Representation.	The Applicant notes this comment.
RR-001	Engagement	ERYC stated that they have been in ongoing communication with the Applicant and have provided feedback throughout the pre-submission stage of the application.	The Applicant acknowledges ERYC's engagement during the pre-submission period and will continue to liaise with ERYC throughout the duration of the examination.
RR-001	Environment	ERYC stated that they will provide detailed feedback in its forthcoming Local Impact Report (LIR) and may also submit a Written Representation (WR) during the examination. The LIR will include ERYC's assessment of the Development Consent	The Applicant acknowledges ERYC's response and looks forward to receiving the Local Impact Report.

		Order (DCO) application, focusing on key issues such as: • Landscape and visual impact • Effects on living conditions, including noise, air quality, and visual outlook • Ecology, biodiversity, and trees • Highways, traffic, and transport • Public Rights of Way • Flood risk and drainage • Archaeology and heritage ERYC emphasised the need to consider both the individual and cumulative impacts of the project and reserves the right to update its position following further analysis.	
RR-001	Engagement	ERYC stated that they will continue to engage with the NSIP process and seek to work proactively with the Inspector and the Applicant in connection with the Proposed Development.	The Applicant acknowledges ERYC's response and will continue to liaise with ERYC throughout the duration of the examination.

2.2 Parish councils

2.2.1 The table below set out the responses to the Relevant Representations from parish councils and the response from the Applicant.

Table 2-2: Tickton and Routh Parish Council Relevant Representation

ID	Theme	Comment	Response
RR-002	Cumulative Effects	Tickton & Routh Parish Council stated that they object to the proposal, citing the cumulative impact of existing and proposed solar developments, with concerns that this is leading to the industrialisation of the area around Tickton and Routh.	The Proposed Development is supported by an assessment of the cumulative effects of the Proposed Development and other nearby projects, provided within **ES Volume 2, Chapter 15: Cumulative Effects [APP-051]**. The starting point for the location of the Proposed Development was the availability of the grid connection at National Grid Creyke Beck Substation. Once the grid connection agreement had been secured, the Applicant sought to find land within the surrounding area that was available and suitable for large scale solar deployment, from an irradiance and topography perspective, while also having regard to environmental and planning constraints. Preference was given to land in close proximity to the point of connection at National Grid Creyke Beck Substation. The location, design and layout of the Proposed Development formed part of an iterative process which was informed and shaped by the ongoing environmental assessment process, site selection

ID	Theme	Comment	Response
			assessment and taking into consideration the project design principles and ongoing engagement and consultation with stakeholders and consultees.
RR-002	Land Use	Tickton & Routh Parish Council highlighted paragraph 187 of the NPPF, stressing the importance of protecting the best and most versatile agricultural land.	The Applicant makes reference to compliance with the policy tests relating to BMV in paragraph 187 of the NPPF within the **Planning Statement** and **Table 4 of Appendix 1 of the Planning Statement [APP-147].** Surveys to determine the quality of land within the Order Limits have been carried out in the pre-application stage, the findings of which can be found in **ES Volume 4, Appendix 10.2: Agricultural Land Classification Report [APP-127].** This confirms that approximately 70% of the surveyed land falls under the category of lower-quality Subgrade 3b and 4 agricultural land, while 30% consists of Best and Most Versatile (BMV) agricultural land (Agricultural Land Classification Grades 1-3a), with the majority of that land classed as 3a.
RR-002	Project need	Tickton & Routh Parish Council noted that East Riding of Yorkshire Council objects to large-scale solar developments across the County.	The Applicant has been engaging with East Riding of Yorkshire Council throughout the application process and will continue to proactively engage with them during the examination stage. The Applicant notes that East Riding of Yorkshire Council did not submit a formal objection to the Proposed Development in their **Relevant Representation [RR-001].**

Table 2-3: Watton Parish Council Relevant Representation

ID	Theme	Comment	Response
RR-003	Cumulative impact	Watton Parish Council expressed concern over the absence of government strategic planning, highlighting the high number of solar proposals in the East Riding. They questioned what constitutes a reasonable maximum area for such developments in the region.	The UK has made a legally binding commitment to achieve net zero carbon emissions by 2050. This can only be achieved with the roll-out of reliable, affordable, clean energy sources such as solar. Solar farms, such as the Proposed Development, would make a meaningful contribution to local and national climate commitments, reducing our impact on the environment and contributing to energy security. The **Planning Statement [APP-147]** sets out the need for the Proposed Development within **Appendix 3, Statement of Need**, and how it is in accordance with national and local planning policy, within A**ppendix 1, Policy Accordance Tables**. The Proposed Development is supported by an assessment of the cumulative and in combination effects of the Proposed Development and other nearby projects, provided within **ES Volume 2, Chapter 15: Cumulative Effects [APP-051]**.

2.3 Statutory consultees

2.3.1 The table below set out the responses to the Relevant Representations from statutory consultees and the response from the Applicant.

Table 2-4: Beverley and North Holderness Internal Drainage Board Relevant Representation

ID	Theme	Comment	Response
RR-004	Water and Hydrology	Beverley and North Holderness Internal Drainage Board stated that most of the Proposed Development site lies within their district. They highlighted that, under the Land Drainage Act 1991 and their byelaws, the applicant must obtain the Board's prior written consent (separately from the planning process) for: • Any connection or discharge (direct or indirect) into Board-maintained or ordinary watercourses; • Any works within or over such watercourses; • Any construction or planting within 9 metres of a watercourse embankment. They also clarified that the Board does not usually own the watercourses, so separate landowner consent may also be required.	The Applicant notes these comments.
RR-004	Water and Hydrology	Beverley and North Holderness Internal Drainage Board stated that, based on the "Location and Land Area Plan" (APP-007) and shapefiles provided by the applicant, they believe the following Board-	The Applicant notes these comments.

ID	Theme	Comment	Response
		maintained watercourses may or will be affected by the Peartree Hill Solar Farm proposal: • Beverley Parks Sewer • Figham Drain • Beverley and Skidby Drain • Well and Stone Carr Drain • Stone Carr Drain • North Wray • Meaux and West Drain (Turnbull Dyke) • Bulldike Drain • Drewery's Soak Dike • Jacksons Low Side Draun • Arnold and Riston Drain • Arnold West Carr Drain • Routh and Meaux Drain (Caresticks) • Routh and Meaux Road Drain • Stonley Goat Dike • Fox Drain Tributary They noted that this list is not exhaustive, and other watercourses within their district may also be impacted and will need consideration.	

ID	Theme	Comment	Response
RR-004	Water and Hydrology	Beverley and North Holderness Internal Drainage Board stated that their prior written consent is required for any new buildings, structures, solar panels, fences, walls, planting, or hardstanding proposed within 9 metres of the top of the embankment of any Board-maintained watercourse.	The design has followed the easement requirements of the IDB and the Environment Agency and note the need for IDB approval if encroachment is proposed. To the extent that any work was proposed in, on, under, over or within 9m from bank top of a watercourse under the control of the Board, this would need to be agreed with the Board pursuant to the protective provisions set out in Schedule 12, Part 3 (For the protection of the drainage authorities) of the **Draft Development Consent Order (DCO) [EN010157/APP/3.1 Revision 4]**.
RR-004	Water and Hydrology	The Board stated that, as a general principle, no development should occur within 9 metres of the top of the embankment of any Board-maintained watercourse. This is to allow access for maintenance machinery and prevent any risk of destabilising the embankments.	The design has followed the easement requirements of the IDB and the Environment Agency.
RR-004	Water and Hydrology	The Board stated that for ordinary (non-Board maintained) watercourses, a minimum 3 metre buffer from the bank top must be left completely clear of buildings, structures, solar panels, fences, walls, planting, or hardstanding. This is to ensure sufficient space for future maintenance by the riparian owner. Importantly, for solar panels, the required buffer remains 9 metres from the bank top of any watercourse.	The design has followed the easement requirements of the IDB and the Environment Agency.

ID	Theme	Comment	Response
RR-004	Drainage	Beverley and North Holderness Internal Drainage Board stated they have reviewed the Flood Risk Assessment and recognises that, due to the site's flat topography and often saturated conditions, conventional drainage solutions such as gravity-fed discharge and store-and-release attenuation are not feasible. Instead, it has been agreed with the Applicant, the IDB, and the Lead Local Flood Authority (LLFA) that runoff will be managed by using gravel bases beneath the Battery Energy Storage System (BESS), substations, and other infrastructure to store and disperse water. As a result, the Board will not require a formal drainage strategy for the solar panels, provided the following key conditions are met: A 9-metre-wide greenfield buffer is maintained from the top of the embankment of all Board maintained and ordinary watercourses. This is essential for maintenance access, embankment stability, and to slow overland water flow. Continuous vegetation cover (no bare soil) is maintained beneath the solar panels year-round to help retain water and reduce runoff velocity. If these conditions are satisfied, the Board considers the impact of the solar panels on surface water runoff to be negligible and will not request further drainage details for the panels.	As set out in the **Outline Landscape and Ecological Management Plan (LEMP) [EN010157/APP/7.5 Revision 3],** the layout of the Proposed Development includes 10m buffer areas from all watercourses and the solar PV modules would have grass beneath them year-round. The drainage strategy has been revised in accordance with the discussion at a meeting with the IDB on 23rd June 2025, as reflected in the revised **ES Volume 4, Appendix 5.6: Flood Risk Assessment [EN010157/APP/6.4 Revision 3],** submitted at Deadline 1.

ID	Theme	Comment	Response
RR-004	Construction Drainage	The Board welcomed the inclusion of paragraph 3.3.4 in the Outline Construction Traffic Management Plan [APP-158], which confirms that internal access tracks will, where possible, follow existing agricultural tracks to minimise new ditch crossings, soil disturbance, and habitat removal. These tracks are expected to be constructed using permeable materials such as gravel or crushed concrete and will generally be up to 4.5 metres wide. Protective membranes may be used in sensitive areas, such as tree root zones or archaeological sites. The Board stated it considers access tracks constructed with Type 3 aggregate (with a 30% voids ratio) as permeable and, therefore, would not require a drainage strategy. However, if the applicant opts for Type 1 or other impermeable materials, the Board will regard the tracks as impermeable and will expect a drainage strategy to be submitted accordingly.	Internal access track design, to include materials, will be confirmed as part of detailed design and submitted to East Riding of Yorkshire Council for approval as part of Requirement 3 of the **Draft DCO [EN010157/APP/3.1 Revision 4].** The Applicant is continuing to liaise with the IDB regarding their request for a drainage strategy.
RR-004	Water and Hydrology	The Board noted from the Flood Risk Assessment (APP-102) that existing watercourse crossings will be used where possible. New crossings will be temporary span truss bridges at bankfull level to minimise flow impact, requiring Board consent after planning approval.	It is the Applicant's intention to utilise existing culvert crossings and/or bridge structures where possible. Pre-construction structural surveys will be undertaken to determine the most appropriate crossing at each location (it is expected that the pre-construction surveys would result in the number of new crossings required to be lower than is shown on

ID	Theme	Comment	Response
		For smaller watercourses where span bridges aren't viable, box culverts will be used, designed to mimic natural channel conditions and minimise impact. Hydraulic modelling shows limited flood risk from these crossings. The Board requested detailed designs for all crossings within their district and expects a standard design to be agreed with them in advance.	**ES Volume 3, Figure 3.6: Indicative Culvert Crossing Points [APP-060]**). Crossing design would be controlled by the protective provisions within Part 3 of Schedule 12 to the **Draft DCO [EN010157/APP/3.1 Revision 4]**, which require plans to be submitted to the Board for approval at the detailed design stage. The approach of bridge crossings has been clarified in both the revised **ES Volume 4, Appendix 5.6: Flood Risk Assessment [EN010157/APP/6.4 Revision 3]** and **ES Volume 4, Appendix 5.5: Water Framework Directive Screening and Scoping Report [EN010157/APP/6.4 Revision 2],** submitted at Deadline 1.
RR-004	Water and Hydrology	The Board welcomed section 7.5.9 of the Flood Risk Assessment [APP-102], which states that cable crossings of watercourses will be limited and, where necessary, will use trellising or horizontal directional drilling to avoid impacting the watercourses. The Board stated that it requires prior written consent for any cables installed beneath watercourses within its district.	The Applicant notes the need to seek written approval from the board prior installing cables over or horizontal directional drilling (HDD) under watercourses within the IDB's district and this is secured in the protective provisions for the benefit of the IDB set out in the **Draft DCO [EN010157/APP/3.1 Revision 4]**.
RR-004	Water and Hydrology	The Board stated it would prefer that any cables crossing watercourses be laid above existing culverts to avoid affecting water flows and to remove the need for consent specifically for the cables. If	As set out in the **Outline Construction Environmental Management Plan (CEMP) [EN010157/APP/7.2 Revision 2]** the Applicant proposes to use HDD or to incorporate cables into a crossing where cable routes cross watercourses. The

ID	Theme	Comment	Response
		this is not possible, directional drilling must be used. Open cut crossings will not be accepted.	Applicant does not seek to use open cut methods for IBD drain crossings.
RR-004	DCO	The Board noted it has reviewed the draft Development Consent Order (APP-019). They note that Article 10 disapplies sections 23, 30, and 32 of the Land Drainage Act 1991, along with any Board Byelaws made under Section 66. Instead, Article 51 gives effect to Schedule 12 (the Protective Provisions). Part 3 of Schedule 12 is relevant to the Board. The Board agrees with these provisions except for Section 17 of Part 3, Schedule 12.	The Applicant thanks the Board for confirming its agreement to the protective provisions in Part 3 of Schedule 12 to the **Draft DCO [EN010157/APP/3.1 Revision 4]**.
RR-004	DCO	The Board clarified that the correct name is Beverley and North Holderness Internal Drainage Board, not "East" Beverley and North Holderness Internal Drainage Board. They also emphasised that for open watercourses, the 9-metre buffer zone should be measured from the top of the bank, rather than from the water's edge or centre.	The Applicant can confirm that requested amendment to the Board's name was made in the copy of the **Draft DCO [EN010157/APP/3.1 Revision 4]** submitted by the Applicant on 3 June 2025. The Applicant has amended the **Draft DCO [EN010157/APP/3.1 Revision 4]** (submitted at Deadline 1) to add that the 9 metres will be measured from the bank top of the watercourse.
RR-004	Drainage	The Board stated that for impermeable areas over 50m², the Board requires a formal drainage strategy. They recommend that soakaways are considered first, following the Planning Practice Guidance hierarchy for surface water management. Specifically, the Board advises:	The concept drainage strategy within **ES Volume 4, Appendix 5.6: Flood Risk Assessment [EN010157/APP/6.4 Revision 3]** has been updated to include a formal drainage strategy (with positive drainage) for the substation hardstanding areas, following the agreement reached in a meeting with the IDB on the 23rd June 2025 and follow up

ID	Theme	Comment	Response
		The applicant should carry out percolation testing, following BRE Digest 365, to determine if the soil is suitable for soakaways. If successful, the applicant must submit a soakaway design for approval by the Lead Local Flood Authority (LLFA). This design should ensure: Storage volume accommodates a 1 in 30-year rainfall event with no surface flooding, including a 30% allowance for climate change. Storage volume prevents any overland discharge off-site during a 1 in 100-year rainfall event, also including a 30% allowance for climate change.	correspondence. The Applicant proposes to drain the proposed hybrid pack areas to ground, mimicking the existing Site response to rainfall. The Applicant will continue to liaise with the Board on this matter. The updated **ES Volume 4, Appendix 5.6: Flood Risk Assessment [EN010157/APP/6.4 Revision 3]** is submitted at Deadline 1.
RR-004	Drainage	Beverley and North Holderness Internal Drainage Board stated that discharge into a watercourse - whether direct or indirect- will only be accepted if soakaways are not feasible. This applies to direct discharges into watercourses and indirect ones via private drainage systems or mains sewers that ultimately lead to a watercourse. In such cases, the Board requires details of the receiving watercourse or sewer and the location of the proposed connection point.	As explained above, this has been addressed in the revised **ES Volume 4, Appendix 5.6: Flood Risk Assessment [EN010157/APP/6.4 Revision 3]** with drainage strategy, submitted at Deadline 1, reflecting the outcomes of the meeting with the IDB on the 23rd June 2025.
RR-004	Drainage	With regard to discharge into a watercourse, the Beverley and North Holderness Internal Drainage Board stated it will only consider this option if soakaways are proven unfeasible. This applies to both direct discharges into a watercourse and	A figure has been provided in the revised **ES Volume 4, Appendix 5.6: Flood Risk Assessment [EN010157/APP/6.4 Revision 3]** with drainage strategy, submitted at Deadline 1 to demonstrate the onward connectivity and flow of the proposed

ID	Theme	Comment	Response
		indirect discharges via private drainage systems or mains sewers that ultimately enter a watercourse. In such cases, the Board requires the applicant to provide details including: • The type of system being discharged into (e.g., an open watercourse). The precise location of the proposed discharge connection point.	discharge locations, the precise location of which will be subject to site setting out.
RR-004	Drainage	Beverley and North Holderness Internal Drainage Board advised that for greenfield or agricultural land, the maximum discharge rate generally accepted is 1.4 litres per second per hectare, with a minimum discharge rate of 0.5 litres per second also applied.	Noted – as reported in the **ES Volume 4, Appendix 5.6: Flood Risk Assessment [EN010157/APP/6.4 Revision 3]** with drainage strategy drawing in Appendix B of the report, a simple Hydrobrake is proposed to limit flow rates from the substation areas as close to QBar and IDB rates as possible. The more detailed drainage designs will be developed in consultation with the IDB.
RR-004	Drainage	The Board clarified that, although it is not the approving authority for flow control devices, it would request basic details on how flows will be restricted to the agreed discharge rate.	Noted – as reported in the **ES Volume 4, Appendix 5.6: Flood Risk Assessment [EN010157/APP/6.4 Revision 3]** with drainage strategy drawing in Appendix B of the report, a simple Hydrobrake is proposed to limit flow rates from the substation areas as close to QBar and IDB rates as possible. The more detailed drainage designs will be developed in consultation with the IDB.
RR-004	Drainage	The Board noted that while it is not the approving authority for surface water storage systems, it would still expect to see details of the proposed system (ideally impermeably lined), along with storage	Noted – as reported in the **ES Volume 4, Appendix 5.6: Flood Risk Assessment [EN010157/APP/6.4 Revision 3]** with drainage strategy drawing in

ID	Theme	Comment	Response
		volume calculations. The system should accommodate a 1:30 year storm event without surface flooding (plus 30% for climate change), and prevent any overland discharge from the site in a 1:100 year event. Wherever possible, the Board recommends designing to fully accommodate the 1:100 year event with climate change allowance.	Appendix B of the report, the proposed storage would be impermeable lined. In accordance with the Environment Agency's Flood Risk Assessments: Climate Change Guidance an uplift of 25% has been added to rainfall, commensurate with a 40-year development lifetime.
RR-004	Drainage	The Board advised that if a direct discharge to a watercourse is proposed, details of the outfall structure must also be provided.	The outfall details are provided in Appendix B of **ES Volume 4, Appendix 5.6: Flood Risk Assessment [EN010157/APP/6.4 Revision 3].**

Table 2-5: Environment Agency Relevant Representation

ID	Theme	Comment	Response
RR-005	General	The Environment Agency confirmed it has reviewed the draft Development Consent Order (DCO), Environmental Statement, and supporting documents submitted for the Proposed Development. It outlined initial key issues within its remit, detailed in Appendix A, and provided further guidance in Appendices B and C. The Agency noted these comments are made without prejudice and may be expanded upon during the examination as more information becomes available.	No response required.
RR-005	**Draft Development Consent Order** The Environment Agency requested changes to dDCO definitions and/or Requirements to ensure that remedial works benefit from the mitigation measures within the Construction Environmental	The Environment Agency raised a concern about the draft Development Consent Order's definition of "permitted preliminary works," which allows remediation of contamination before the Construction Environmental Management Plan (CEMP) is approved. This could mean important environmental controls aren't in place during early works. To address this, the Agency recommends either removing remediation from the list of permitted preliminary works or amending Requirement 4 so that remediation is subject to the CEMP.	The Applicant's proposed drafting is consistent with the majority of recently made solar DCO decisions (including the East Yorkshire Solar Farm Order 2025, the West Burton Solar Project Order 2025, and Heckington Fen Solar Park Order 2025) and thus reflects a well precedented approach. The drafting has been included to ensure that there is a proportionate degree of flexibility available to the Applicant, since without it the carrying out of each of the activities comprised within the definition of "permitted preliminary works" would be sufficient to require the submission of detailed plans for approval under Schedule 2 to the draft Development Consent Order. This would be disproportionate to the nature of the works

ID	Theme	Comment	Response
	Management Plan (CEMP).		involved, which are, in each case, minor and are not expected to give rise to any significant environmental effects.
RR-005	**Draft Development Consent Order** The Environment Agency requested to be a named consultee for the discharge of Requirements 4, 6 and 8.	The Environment Agency raised an issue with not being listed as a consultee for Requirement 4 (CEMP). Since the CEMP contains critical mitigation measures to prevent environmental harm during construction, the Agency expressed concern that without their input, potential issues may not be adequately addressed or monitored. They requested to be formally consulted on the CEMP before it is approved.	The Applicant has amended the draft DCO to include the Environment Agency as a consultee for Requirement 4 in the version of the **Draft DCO [EN010157/APP/3.1 Revision 4]** submitted at Deadline 1.
RR-005	**Draft Development Consent Order** The Environment Agency requested to be a named consultee for the discharge of Requirements 4, 6 and 8.	The Environment Agency highlighted that they are not listed as a consultee for the discharge of Requirement 6 (Soil Management Plan). They expressed concern that without their involvement, potential risks to groundwater from contamination may not be properly managed or remediated. They requested to be formally consulted on the Soil Management Plan prior to its approval.	The mechanism to manage/prevent groundwater contamination is contained within the **Outline CEMP [EN010157/APP/7.2 Revision 2].** The Environment Agency has been added as a consultee on Requirement 4 in the version of the **Draft DCO [EN010157/APP/3.1 Revision 4]** submitted at Deadline 1. This is considered to give the Environment Agency sufficient opportunity to review the measures to manage/prevent groundwater contamination.

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RR-005	**Draft Development Consent Order** The Environment Agency requested to be a named consultee for the discharge of Requirements 4, 6 and 8.	The Environment Agency stated that the Outline Battery Safety Management Plan [APP-157] lacks sufficient detail on protecting controlled water receptors from contamination in the event of a fire at the Battery Energy Storage System (BESS) compounds. They expressed concern that without proper drainage and containment measures, sensitive groundwater and surface water could be at risk from fire-fighting runoff. They requested to be consulted on the final Battery Safety Management Plan before it is approved under Requirement 8.	The Applicant has amended the **Draft DCO [EN010157/APP/3.1 Revision 4]** to include the Environment Agency as a consultee for Requirement 8 in the version of the draft DCO submitted at Deadline 1. Additional analysis and evidence is presented in the **ES Volume 4, Appendix 5.5: Water Framework Directive Screening and Scoping Report [EN010157/APP/6.4 Revision 2]** to demonstrate that, using a source-pathway-receptor method, the chance of fires occurring is incredibly low and well below HSE-defined socially acceptable thresholds. The release of contaminants is also very unlikely, according to available evidence from fires globally. Finally, the pathway to the environment is mitigate or low. Therefore, the risk to the water environment from battery fires is negligible.
RR-005	**Draft Development Consent Order** We request an additional Requirement to deal with	The Environment Agency stated that the current commitments for managing unexpected contamination in the Development Consent Order (DCO) are not sufficiently robust. They expressed concern that this could lead to inadequate investigation and remediation of contamination, risking groundwater quality.	The Applicant has added the commitment for unsuspected contamination into the **Commitments Register [EN010157/APP/6.4 Revision 2]** based on the wording provided by the Environment Agency in its relevant representation. Measures for managing unsuspected contamination have been secured through the **Outline CEMP [EN010157/APP/7.2 Revision 2]**

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	unsuspected contamination.	They proposed adding a specific Requirement for "Unsuspected Contamination" to the DCO. This would ensure that if previously unidentified contamination is found during the development, all work in the affected area must stop and the contamination reported promptly to the Secretary of State, the Environment Agency, and the planning authority. A risk assessment would then be carried out in consultation with these bodies. If remediation is needed, a detailed plan must be submitted and approved before work can continue, and remediation must follow the approved scheme.	and **Outline Decommissioning Environmental Management Plan (DEMP) [EN010157/APP/7.4 Revision 2]**. The wording added into the above documents is as follows. The updated documents are submitted at Deadline 1. "Unsuspected Contamination In the event that contaminated land, including groundwater, is found at any time when carrying out the Proposed Development, which was not previously identified in the ES, then no further development (unless otherwise approved in writing by the relevant authorities) shall be carried out within the identifiable perimeters of the area in which the suspected contamination is located. It must be reported as soon as reasonably practicable to the Secretary of State, the Environment Agency and East Riding of Yorkshire Council, and the undertaker must complete a risk assessment of the contamination in consultation with the Environment Agency and the East Riding of Yorkshire Council. Where the undertaker determines that remediation of the contaminated land is necessary, a written scheme and programme for the remedial measures to be taken to render the land fit for its intended purpose must be submitted to and approved by the

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			Environment Agency and East Riding of Yorkshire Council. Remediation must be carried out in accordance with the approved development."
RR-005	**Draft Development Consent Order** Protective Provisions for the disapplication of the Environmental Permitting Regulations (EPR) 2016 have not yet been agreed.	<u>Disapplication of Legislative Provisions</u> We note the Applicant is seeking disapplication of the provisions of any byelaws made under, or having effect as if made under, paragraphs 5, 6 or 6A of Schedule 25 (byelaw making powers of the appropriate agency) to the Water Resources Act 1991 and also regulation 12 (requirement for environmental permit) of the Environmental Permitting (England and Wales) Regulations 2016(d) in respect of a flood risk activity only. In previous discussions with the Applicant, we have agreed, in principle, to the disapplication of EPR, subject to the provision of details for any structures and a basic method statement for major works. We have provided the Applicant with a copy of our standard protective provisions and are in ongoing discussions to agree proposed changes.	The Applicant is in ongoing discussions with the Environment Agency regarding the protective provisions and will continue to engage with the Environment Agency to agree to the protective provisions for the benefit of the Environment Agency prior to the close of the Examination.

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		The Environment Agency noted that the Applicant is seeking to disapply certain byelaws under the Water Resources Act 1991 and environmental permitting requirements related to flood risk activities. The Agency stated that it has, in principle, agreed to this disapplication provided that the Applicant supplies details of any structures involved and a basic method statement for major works. They have shared their standard protective provisions with the Applicant and are continuing discussions to agree on the proposed changes.	
RR-005	**Draft Development Consent Order** We are not in a position to agree to disapplication of the Water Resources Act 1991 in respect to byelaws, without demonstration of need.	We have not agreed to disapply the Water Resources Act at this stage but have requested clarification on the need to disapply in this regard. The Environment Agency clarified that they have not agreed to disapply the Water Resources Act at this stage and have requested further clarification from the Applicant on the need for such a disapplication.	The disapplication of the byelaws made under paragraphs 5, 6 or 6A of Schedule 25 of the Water Resources Act 1991 are sought on the basis that byelaws made under those provisions address matters whose merits and acceptability can, and will, already have been sufficiently considered and resolved if the Order is made, including by means of the protective provisions currently under discussion with the Environment Agency. Such matters should therefore not be the subject of further regulatory consideration or control, which would cause unnecessary uncertainty and duplication, and may unjustifiably delay the implementation of the Proposed Development.

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RR-005	**Environmental Statement** Additional information is needed on vehicular and cable crossings, including justification for crossing types chosen and detail regarding proximity to flood defences.	The Environment Agency raised concerns about the proposed use of culverts on multiple watercourses, noting their general policy against culverts and that the impacts have only been assessed for construction, not operation or decommissioning phases. They highlighted that culverts can disrupt water flow, sediment transport, and habitats, potentially affecting compliance with the Water Framework Directive. The Agency requested that the Applicant to avoid culverts where possible, justify their necessity if unavoidable, and assess impacts throughout all project phases. They recommend following a hierarchy of crossing types, favouring clear span bridges and arched culverts over piped or box culverts, which should include features like a buried invert and mammal ledge. Decisions on culvert use should be made case-by-case, linked to a detailed crossings schedule, with further guidance available from SEPA's good practice guide on river crossings.	It is the Applicant's intention to utilise existing culvert crossings and/or bridge structures where possible. For the purposes of the assessment, 20 locations are assumed to require either the installation of a temporary span bridge or culvert; or reinforcement or widening of the existing culvert/bridge structure. To ensure a worst-case scenario has been assessed, it has been assumed that all existing crossings will require a new culvert structure. It is however expected that following pre-construction surveys that this number of new culverts required would be lower. Structural surveys of existing culverts will be undertaken as part of detailed design when more exact details of the crossings, equipment to be installed and overall layout of the solar farm are known. A review of existing crossings will be undertaken in order to review the worst-case scenario presented in the assessment, however, this is expected to confirm a lower number of crossings as noted above. The crossings over minor watercourses, which are likely to be wet for much of the year, would be facilitated by box culverts. These would be fitted with a mammal shelf and the bed substrate would match that of the watercourse within the vicinity of the crossing, therefore no significant effects on

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			water vole or otter are anticipated. **ES Volume 3, Figure 3.6: Indicative Culvert Crossing Points [APP-060]** identifies each of the proposed culvert locations. Crossings would be maintained in the operation phase to ensure continued operational access to the land areas. The crossing types and locations are subject to surveys and detailed designs to be completed in consultation with the EA. Therefore, the crossings would only be proposed if their long terms impacts are not significant. It should be noted Water has been scoped out as a standalone chapter in the ES so this is reflected in **ES Volume 4, Appendix 5.5: Water Framework Directive Screening and Scoping Report [EN010157/APP/6.4 Revision 2]**. It should be noted that **Appendix F** of the **Hydraulic Modelling Report (Appendix C of ES Volume 4, Appendix 5.6: Flood Risk Assessment [EN010157/APP/6.4 Revision 3])** included model tests with additional structures over various watercourse locations. This demonstrated no significant impact on flood risk arising from the inclusion of additional structures
RR-005	**Environmental Statement**	The Environment Agency highlighted concerns about culverts remaining in place after project decommissioning.	The approach to maintaining crossing points following decommissioning will be agreed at decommissioning stage. The approach will be

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	The Environment Agency stated that additional information is needed on vehicular and cable crossings, including justification for crossing types chosen and detail regarding proximity to flood defences.	They noted that culverts can cause lasting impacts on watercourse morphology, including flow restriction and disruption to sediment transport, which may affect protected species like otters and water voles. The Agency urged the Applicant to carefully consider the necessity of culverts throughout all project phases and to assess the benefits of removing culverts post-decommissioning to support Water Framework Directive objectives. This aligns with National Policy Statement EN-3's recommendation to restore habitats where practicable after construction.	dependent on the final crossing design and will consider environmental impact, continued farm access and legacy arrangements. Watercourse crossings would only be installed where it can be demonstrated their impact would not be significant. Consequently, their continued use post-decommissioning would likewise be not significant and would have been assessed.
RR-005	**Environmental Statement** The Environment Agency stated that additional information is needed on vehicular and cable crossings, including justification for crossing types chosen and detail regarding	The Environment Agency raised concerns about the final locations of HDD pits, trenching, compounds, and access routes within Figham Pastures Local Wildlife Site (LWS). They expressed concern that there is a risk these works could disturb or damage the large sedge bed, which is important for floodplain and coastal grazing marsh habitats. The Agency recommended avoiding the sedge bed area, particularly near the River Hull and south of Beverley Beck. They suggest committing to complete the HDD crossing beneath the LWS to prevent direct habitat	The Applicant has not yet provided detail of the final cable design and HDD pit location due to the need to retain flexibility until detailed design when survey work can be carried out to determine the most appropriate locations. Environmental factors will inform these locations at detailed design within what routes are possible from an engineering perspective. The Applicant has committed to a number of parameters regarding cabling. These are outlined in the **Design Parameters Document [EN010157/APP/5.8 Revision 2]** and **ES Volume 1, Chapter 3: Proposed Development Description [APP-039].**

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	proximity to flood defences.	damage, following the hierarchical approach outlined in NPS EN-1.	The Applicant will seek to HDD under the whole of the common where reasonably practicable. A number of technical constraints exist which require further investigation until viability can be determined. However, the Applicant intends to HDD under the River Hull and continue the HDD until after Beverley and Barmston drain, thereby HDD-ing under the large sedge bed that lies between the two watercourses. A detailed cable route design will be produced post consent and informed by borehole and trial hole surveys. It is not appropriate to commission these surveys prior to consent. HDD works will require full topographical, utility (including the potential for exploratory surveys and trial holes to locate known services) and geotechnical surveys at the drill locations. In addition to the survey information, detailed design of the cable route including cable sizing will need to be undertaken to determine the location of launch and receiver pits for the HDD and depths of the drill route(s). Further information regarding the exact working areas will be provided within the Construction Environmental Management Plan. The working area will consider biodiversity and, where possible, avoid areas of key habitat associated with priority habitat. Furthermore, pre-

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			construction surveys as detailed within the **Outline CEMP [EN010157/APP/7.2 Revision 2]** will assist with micro siting the working areas to avoid key ecological receptors. The pre-construction survey will include a National Vegetation Classification (NVC) survey of the habitat within and directly adjacent to the working area. The data gathered by the NVC survey will be provided to East Riding of Yorkshire Council. An Ecological Clerk of Works will be appointed to supervise construction works within Figham Pasture LWS. The **Outline CEMP [EN010157/APP/7.2 Revision 2]** details the extensive measures to be undertaken to ensure priority habitat associated with Figham Pasture LWS is re-instated back to its pre-construction condition. However, it is worth noting much of the existing habitat within Figham Pastures LWS is in poor condition, especially along the boundary adjacent to Tokenspire Business Park, due to soil compaction and general soil degradation associated with livestock grazing and livestock management.
RR-005	**Environmental Statement** The Environment Agency stated that it is not clear how private water	The Environment Agency highlighted that details and locations of private water supplies, particularly unlicensed ones, were not included in Chapter 10 or its appendices. They expressed concern that this omission risks overlooking these	**ES Volume 2, Chapter 10: Land, Soil and Groundwater [APP-046]** presents baseline data for the private water abstractions that are known to be present in and within 500m of the Order Limits. This information was produced from a combination of data from the Envirocheck report (presented as

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	supplies have been considered within the assessment.	supplies as vulnerable receptors to contamination within the study area. The Agency requested that all private water supplies be identified and assessed to ensure no significant impacts occur. They noted that while licensed groundwater abstractions are listed, unlicensed private supplies have not been adequately considered.	Appendix B of **ES Volume 4, Appendix 10.1: Preliminary Risk Assessment [APP-124 to APP-126]** and data provided by East Riding of Yorkshire Council (by email dated 10 December 2024). The information presented within **ES Volume 2, Chapter 10: Land, Soil and Groundwater [APP-046]** discussed these private water abstractions as if all these locations were licensed. A distinction should have been made between licensed and unlicensed private water supplies and this was not made clear. All the private water supplies listed within the Envirocheck data are licensed abstractions, with recorded licence numbers provided as part of the dataset. Of the private water supply information provided by East Riding of Yorkshire Council, some locations were duplicated on the Envirocheck dataset and are therefore also licensed. Those that did not also appear on the Envirocheck list, and did not have associated licence numbers, are unlicensed private water supplies. This applies to three of the private water supplies, all of which were located outside the Order Limits but within a distance of 10m to 35m from the Order Limits boundary. **ES Volume 2, Chapter 10: Land, Soil and Groundwater [APP-046]** provides details on licensed and unlicensed water supplies in and

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			within 500m of the Order Limits. It should be noted that all of these private water supplies were assessed, so no update to the conclusions of the assessment with respect to private water supplies is required, but the clarification of which of the identified private water supplies are licensed and which are unlicensed should resolve this Relevant Representation. It should also be noted that some errors were identified which were unfortunately not noticed prior to submission of the chapter. As a result, **ES Volume 4, Appendix 10.1: Preliminary Risk Assessment [APP-124 to APP-126]** has been updated to present a revised table of water abstractions, with associated amendments carried over into **ES Volume 2, Chapter 10: Land, Soil and Groundwater [APP-046].** This removes a number of abstraction locations that are no longer within the study area, and which adjusts distances from the Order Limits to some of the other locations. (Please refer to response to **Relevant Representation ID: EA22** for further information relating to this dataset, including the updated dataset for the private water supplies).
RR-005	**Environmental Statement** Additional consideration needed on	The Environment Agency noted a risk that land drains could be damaged by piled panel stanchions during construction, potentially creating pathways for sediment to enter watercourses. They requested that the Outline Construction	The **Outline CEMP [EN010157/APP/7.2 Revision 2]** has been updated to include the commitment to inspect land drains to ensure no damage has occurred or pollution pathways created. If land drains have been damaged, any remedial works

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	impacts on land drains and the potential for pollutant/sediment pathways creation.	Environmental Management Plan (oCEMP) be updated to include commitments to inspect land drains for damage and pollution pathways, and to implement a remediation plan if damage is found during construction.	will be identified and a plan for their delivery will be implemented. This is reflected in the **ES Volume 4, Appendix 5.5: Water Framework Directive Screening and Scoping Report [EN010157/APP/6.4 Revision 2]** and **ES Volume 4, Appendix 5.6: Flood Risk Assessment [EN010157/APP/6.4 Revision 3].** The aforementioned revised documents have been submitted at examination Deadline 1.
RR-005	**Environmental Statement** The Environment Agency stated that confirmation needed that flood risk assessment includes the entire decommissioning phase.	The Environment Agency highlighted that the Flood Risk Assessment (FRA) assumes decommissioning will start before 2070 but does not assess flood risk beyond that date. They expressed concern that since decommissioning might extend past 2070, this leaves flood risk inadequately assessed for the full project lifetime. They requested the Applicant either include a Requirement to complete decommissioning by 2070 or extend the flood risk and climate change assessment to cover the 2080s and beyond.	The **ES Volume 4, Appendix 5.6: Flood Risk Assessment [EN010157/APP/6.4 Revision 3]** has provided updated wording to address the decommissioning timing. The FRA and the supporting modelling is based on more severe flow increases than the climate change allowances in the period 2070-2125. Consequently, should the lifetime of the Proposed Development extend marginally into the 2080s epoch, the FRA concludes that the Proposed Development is resilient to anticipated flood risk for that short period. Therefore, the mitigation recommended in the FRA is a robust approach to safeguarding against the potential of extreme climate change over whole lifetime of the Proposed Development. Finally, it should be noted that the Decommissioning Environmental Management Plan would be based on the flood risk profile and

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			best available information on flood risk posed to the Site at that time.
RR-005	**Environmental Statement** The Environment Agency stated that amendments are needed to the Flood Risk Assessment (FRA), including on the roughness sensitivity assessment, updated flood risk data, and the determination of functional floodplain	The Environment Agency noted that the Applicant has not provided details of all crossings, some of which may encroach within 8 metres of watercourses or flood defences. They expressed concern that this could potentially harm watercourses or flood defences, increasing flood risk. They requested the Applicant to confirm the types of all crossings and supply drawings for those near flood defences, showing minimum distances. Additionally, any below-ground crossings should assess impacts on embankments or structures to ensure flood defence foundations are not compromised.	Crossing types will be confirmed at detailed design stage following structural survey work. It is the Applicant's intention to utilise existing culvert crossings and/or bridge structures where possible. For the purposes of the assessment, 20 locations are assumed to require either the installation of a temporary span bridge or culvert; or reinforcement or widening of the existing culvert/bridge structure. To ensure a worst-case scenario has been assessed, it has been assumed that all existing crossings will require a new culvert structure. It is however expected that following pre-construction surveys that this number of new culverts required would be lower. The **Draft DCO [EN010157/APP/3.1 Revision 4]** contains protective provisions for the benefit of the Environment Agency for Environment Agency controlled watercourses. Detailed design drawings will be submitted under the protective provisions to the Environment Agency for approval. The Indicative HDD Crossing Points are shown on **ES Volume 3, Figure 3.3: Indicative HDD Crossing Points [APP-057].**

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			Indicative Culvert Crossing Points are shown on **ES Volume 3, Figure 3.6: Indicative Culvert Crossing Points [APP-060].** The **ES Volume 4, Appendix 5.6: Flood Risk Assessment [EN010157/APP/6.4 Revision 3]** clarifies that the easements are applied to both watercourses and defences.
RR-005	**Environmental Statement** The Environment Agency stated that amendments are needed to the Flood Risk Assessment (FRA), including on the roughness sensitivity assessment, updated flood risk data, and the determination of functional floodplain	The Environment Agency highlighted that the roughness sensitivity test, assessing the impact of solar panel support frames on flood risk, references drawings 20-206-60-244 to 20-206-60-246 which were not provided. The stated that without these drawings, it is difficult to fully assess the flood risk impact. They requested the Flood Risk Assessment (FRA) be updated to include the missing drawings.	The **ES Volume 4, Appendix 5.6: Flood Risk Assessment [EN010157/APP/6.4 Revision 3]** summarises that the model is not sensitive to changes to the tidal boundary, fluvial inflows and Manning's roughness, with reference to the Peartree Hydraulic Modelling Report in Appendix C. The updated **ES Volume 4, Appendix 5.6: Flood Risk Assessment [EN010157/APP/6.4 Revision 3]** that was submitted to the Planning Inspectorate on 8 July 2025 included the referenced drawings in the appendices of the Peartree Hydraulic Modelling Report.
RR-005	**Environmental Statement**	The Environment Agency noted that the Flood Risk Assessment's surface water flooding data is outdated, as newer data was published in January 2025. They	This issue was addressed by the 'Section 51' updates to **ES Volume 4, Appendix 5.6: Flood Risk Assessment [EN010157/APP/6.4 Revision 3],** submitted to the EA on 8th July 2025. The FRA

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	The Environment Agency stated that amendments are needed to the Flood Risk Assessment (FRA), including on the roughness sensitivity assessment, updated flood risk data, and the determination of functional floodplain	expressed concern that this could mean the flood risk assessment is inaccurate. They requested the Flood Risk Assessment be updated to reference the latest data, including climate change allowances for the 2050s, and to check if any containerised infrastructure is affected by flood depths over 0.3m.	was updated to reflect the latest (January 2025) RoFSW modelling as well as the revised (March 2025) Flood Map for Planning updates. This reassessed the risk of flooding to the site, primarily from surface water given the site specific flood modelling would supersede the flood zones, and ensured that the mitigation proposed remains valid.
RR-005	**Environmental Statement** The Environment Agency stated that amendments are needed to the Flood Risk Assessment (FRA), including on the roughness sensitivity assessment, updated flood risk	The Environment Agency highlighted that the Flood Risk Assessment (FRA) states all water-sensitive equipment will be located outside the 1 in 20-year flood event area (Flood Zone 3b, the functional floodplain). However, they are concerned this floodplain extent may be underestimated. They requested confirmation that the equipment is also outside the 1 in 30-year flood extent. They referenced updated Planning Practice Guidance, which defines Flood Zone 3b as areas with a 3.3% or greater annual	In the absence of modelled 1 in 30-year event outputs, the revised **ES Volume 4, Appendix 5.6: Flood Risk Assessment [EN010157/APP/6.4 Revision 3]** has used the 1 in 50 year outputs to ensure a conservative estimate. The revised **ES Volume 4, Appendix 5.6: Flood Risk Assessment [EN010157/APP/6.4 Revision 3]** (submitted at Deadline 1) confirms no sensitive equipment is to be placed in the 1 in 50 year extent nor any stockpiling to be located in this area.

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	data, and the determination of functional floodplain	flood probability, assuming flood defences operate effectively.	
RR-005	**Environmental Statement** The Environment Agency stated that additional drainage information is required to ensure pollution prevention measures are robust.	The Environment Agency raised concerns about the surface water drainage strategy for the BESS (Battery Energy Storage System) units, which are proposed in sensitive groundwater areas, including principal aquifers and Source Protection Zones 2 and 3. They noted that minimal detail has been provided on managing surface water from the BESS compounds, inverters, and substations. Key issues included potential contamination risks to sensitive groundwater without proper drainage and mitigation. There is unclear information on the "clean, non-toxic" aerosol suppression system and how water used for cooling or firefighting will be contained to prevent pollution. Additionally, there is uncertainty about how fire-fighting strategies would change if multiple BESS units catch fire. The Environment Agency also expressed doubts over the reliance on limestone drainage layers and gravel bases to neutralise contaminants, with no clear plan for managing other pollutants.	With respect to supporting the detailed drainage strategy by completing a conceptual site model in order to outline possible pollutants, pathways, and groundwater receptors, the first phase of this has been submitted as part of **ES Volume 4, Appendix 10.1: Preliminary Risk Assessment [APP-124 to APP-126]**. This incorporates an initial conceptual site model based on the desk-based assessment that was completed for the Order Limits and study area defined in **ES Volume 2, Chapter 10: Land, Soil and Groundwater [APP-046]**. This model will be refined following completion of the pre-construction, intrusive site investigation work for the Proposed Development (as recommended in **ES Volume 4, Appendix 10.1: Preliminary Risk Assessment [APP-124 to APP-126]**. The refined conceptual site model will use site-specific data from the intrusive site investigation to determine the viability of the potential contaminant linkages, allow conclusions to be drawn as to whether additional work is required (for example a further phase of site investigation, or monitoring works) or whether sufficient information has been presented to allow the potential contamination linkage to be determined to be not viable (for example if there is

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		They stated that there are contradictions in the Water Framework Directive report regarding contaminant pathways to surface water and groundwater. They expressed concern that the proposed use of permeable membranes and gravel bases could allow contaminant percolation, which conflicts with best practice that firewater from BESS sites on principal aquifers should be contained. The Environment Agency requested a detailed drainage strategy that clearly demonstrates how surface water will be managed at all relevant facilities. This should include measures to protect controlled water receptors from contamination and provide a conceptual site model identifying potential pollutants, pathways, and receptors. They stated that the strategy must also incorporate a robust mechanism to contain firewater runoff in the event of a fire. This drainage strategy is essential to address the risks to groundwater and surface water posed by the proposed development.	no contaminant source present, or if a pathway can be shown to be absent). It would be expected that the refined conceptual site model would be presented in an interpretative report to be prepared after the intrusive site investigation work has been completed. The choice of fire suppression system is dependent on the BESS design and can be both an aerosol (generally Potassium Nitrate solution) or a gaseous asphyxiant (inert gas or mixture of gases). The detail of which specific system has not yet been confirmed and will be decided following procurement discussions and the finalisation of the Battery Safety Management Plan in consultation with Humberside Fire and Rescue Service and the Environment Agency (as set out in response to **Relevant Representation ID: EA04**). The advantage of an aerosol is that it is still effective should the outer fabric of the BESS be compromised, whereas gas will escape to the atmosphere. The advantage of gaseous systems is they deploy rapidly and do not require dedicated pipe work to direct the suppressant. The Fire and Rescue Services consider that attempts to extinguish BESS fires directly with water is not effective. It is difficult to direct water on the fire source as it is often buried deep in the unit,

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			and the BESS are IP rated. The FRS instead keep the boundary cool, i.e. keep the surroundings wet, and fire contained, allowing the BESS to burn out. Occasionally they may opt to suppress any smoke with an aerosol umbrella spray, to prevent excessive spread of the smoke. The **ES Volume 4, Appendix 5.5: Water Framework Directive Screening and Scoping Report [EN010157/APP/6.4 Revision 2]** presents evidence that the risk of fire occurring is extremely low and well within socially acceptable thresholds, in accordance with HSE standards. Evidence from known fires globally show that during these events, the levels of recorded pollutants remained low.
RR-005	**Environmental Statement** The Environment Agency stated that Additional drainage information required to ensure pollution prevention	The Environment Agency identified that the Applicant had not assessed the potential loss of floodplain storage caused by crossings and material storage during the construction phase. They highlighted that without such an assessment and the implementation of necessary mitigation, there could be increased flood depths, expanded flooding extents, and off-site flooding. The Agency recommended that the applicant undertake a cumulative impact assessment addressing multiple storage areas and new crossings over main rivers. This assessment was to	The **ES Volume 4, Appendix 5.6: Flood Risk Assessment [EN010157/APP/6.4 Revision 3]** and associated modelling (submitted at Deadline 1) has been updated to simulate the impact of stockpiled material being located in the floodplain, resulting in a negligible impact on predicted flood levels. Drawings have been provided in Appendix B of **ES Volume 4, Appendix 5.6: Flood Risk Assessment [EN010157/APP/6.4 Revision 3]** to demonstrate this impact. Crossing types will be confirmed at detailed design stage following structural survey work. The Draft DCO contains protective provisions for the benefit

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	measures are robust.	guide the design approach, with best practice being to minimise impacts from crossing structures and favour clear span designs where possible. The Environment Agency noted positively that stockpiling was proposed to be located outside of the 1 in 20-year flood outline.	of the EA and IDB controlled watercourses. They will be designed so that they do not compromise existing flood defence assets or have a significant negative impact on flood risk, channel flows or watercourse morphology in order to ensure compliance with relevant policy and legislation. Detailed design drawings will be submitted under the protective provisions for approval, and this will be accompanied by an assessment of the impact on flood risk and hydrology.
RR-005	**Other Documents** The Environment Agency stated that additional information is needed on electro-magnetic field impacts on fish and protection measures for river lamprey.	The Environment Agency noted that insufficient evidence or detail had been provided to support the assumption that electro-magnetic fields (EMF) from cables buried at 7 metres depth under the River Hull would not impact fish. They expressed concern that the proposed cable depth might still affect fish due to EMFs. The Agency requested details of the magnetic field strength and how it compared to natural background levels at the riverbed where the cables were buried.	Section 7.5 of the **Habitats Regulations Assessment - Information to inform Appropriate Assessment [EN010157/APP/5.3 Revision 2]** has been updated to provide additional information on known magnetic fields from National Grid monitoring of cables buried at approximately 1m, which shows magnetic field levels below those which occur naturally. Given that the depth of the Proposed Development would be seven times greater, it is reasonable to assume that the resultant magnetic field would be even lower and much less than the naturally occurring magnetic field. As such, no significant effects are anticipated.
RR-005	**Other Documents** The Environment Agency stated that additional	The Environment Agency identified that although the preferred timing for Horizontal Directional Drilling (HDD) under the River Hull was stated to be during spring and summer (April to September) to avoid the peak river	The preferred timings to undertake the HDD would be during spring/summer (April to September), when the ground conditions would be drier. This would avoid the peak river lamprey migration period. While the Applicant cannot commit to this

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	information is needed on electro-magnetic field impacts on fish and protection measures for river lamprey.	lamprey migration period, there was no formal commitment to this in the Commitments Register or the Outline Construction Environmental Management Plan (oCEMP). They highlighted that HDD under the River Hull could adversely impact the protected river lamprey species. The Agency requested a firm commitment to complete the HDD crossings between April and September, secured through the oCEMP.	restriction at this stage, they will adhere to these timings where possible. In the unlikely event that it is not possible to avoid the river lamprey migration period, as detailed in Section 7.5 of the updated **Habitats Regulations Assessment - Information to inform Appropriate Assessment [EN010157/APP/5.3 Revision 2]**, no adverse effects on the integrity of the SAC/Ramsar site populations are anticipated given that the HDD under the River Hull would be at a minimum depth of 7m, very short-term (estimated to take a maximum of 24 hours), and that fish without a swim bladder (which includes lamprey) have the lowest sensitivity to noise/vibration. The updated **Habitats Regulations Assessment - Information to inform Appropriate Assessment [EN010157/APP/5.3 Revision 2]**, is submitted at Deadline 1.
RR-005	**Other Documents** The Environment Agency stated that additional consideration is	The Environment Agency noted that while abstraction was considered unlikely, if pumping or dewatering activities were required, contractors would need to apply for licences before starting any abstraction or impoundment. They identified 22 HDD crossing points but observed that the water demand for these	No water is to be abstracted for HDD works. HDD wastewater (including bentonite) will be removed from site in bowser trucks and where necessary remaining wastewater will be incarcerated within the launch pit and transported to a specialised local facility for disposal. Should abstraction be required suitable licences would be sought post consent and prior to commencement of development.

ID	Theme	Comment	Response
	needed regarding abstraction requirements / consents.	activities had not been evaluated. Groundwater abstraction in the area was closed due to the risk of saline intrusion, and shallow pumping could be treated as surface water abstraction, subject to restrictions. Any dewatering would need to be shown as non-consumptive to obtain a licence. The Agency emphasised that it was the Applicant's responsibility to ensure licences were identified and secured before construction began. They recommended developing a water supply strategy to assess different sources of supply well in advance during the planning phase, including the potential need for abstraction. They also noted that the licence determination process could take up to three to four months, so adequate planning was essential to avoid delays.	Section 2.4 of the **Habitats Regulations Assessment - Information to inform Appropriate Assessment [EN010157/APP/5.3 Revision 2]** has been updated to confirm that no water will be abstracted from the River Hull and its tributaries for the HDD and that wastewater from the HDD be removed and disposed of off-site. Reference to potential water abstraction impacts have been removed. The commitment has also been added to the updated **Outline CEMP [EN010157/APP/7.2 Revision 2]**. The **ES Volume 4, Appendix 5.5: Water Framework Directive Screening and Scoping Report [EN010157/APP/6.4 Revision 2]** has been updated to state that dewatering may be required if groundwater levels are high but the extent, location and amount of this is unknown and dependent on too many factors that require further investigation, not least the contractor's programme. The Applicant has produced a standalone water resource note (see **Appendix 1 - Water Resources Technical Note [EN010157/APP/8.3]**) to clarify that water used during construction would be tankered in from mains and therefore no abstractions. There will be a significant betterment

ID	Theme	Comment	Response
			in terms of water use during operation given negligible use when the site is energised. The aforementioned revised documents have been submitted at examination Deadline 1.
RR-005	**Other Documents** The Environment Agency stated that additional measures are needed within the Outline Construction Environmental Management Plan (oCEMP) to cover mammal entrapment, protection of sensitive groundwater receptors and water supply for consumptive uses.	The Environment Agency identified a risk of mammal entrapment from open trench cutting that had not been addressed in the Outline Construction Environmental Management Plan (oCEMP). This posed a risk of injury or death to protected species. They requested that the oCEMP be updated to include measures addressing this risk within the Riparian Mammal Species Protection Plan. The Agency also recommended appropriate mitigation such as using trench covers, installing ramps to allow wildlife to escape, and ensuring compounds were securely fenced.	The **Outline CEMP [EN010157/APP/7.2 Revision 2]** has been updated and submitted at examination Deadline 1 to ensure that mitigation measures for the risk of mammal entrapment from open trench cutting are included and that this risk is considered within the Riparian Mammal Species Protection Plan.
RR-005	**Other Documents**	The Environment Agency noted that the cable route had not yet been decided, and while it was planned to avoid sensitive	It is noted by the Environment Agency that **ES Volume 2, Chapter 10: Land Soil and Groundwater [APP-046]** gives very little emphasis

ID	Theme	Comment	Response
	The Environment Agency stated that additional measures are needed within the Outline Construction Environmental Management Plan (oCEMP) to cover mammal entrapment, protection of sensitive groundwater receptors and water supply for consumptive uses.	receptors, the application gave very little emphasis to protecting groundwater within Source Protection Zones (SPZs) on site. Although some mitigation measures, like a Bentonite Breakout Plan, were referenced, there was no mention of a Hydrogeological Risk Assessment to evaluate risks to sensitive groundwater receptors. The Agency highlighted that construction using Horizontal Directional Drilling (HDD) could impact sensitive groundwater underlying the cable route options. They requested a site-specific Hydrogeological Risk Assessment for HDD crossings to be produced and included as an appendix to the Construction Environmental Management Plan (CEMP). The oCEMP was also expected to be updated to reflect this and to confirm that the Environment Agency's approach to groundwater protection would be incorporated, ensuring sufficient pollution mitigation and avoidance of the most sensitive receptors wherever possible.	to the importance of protecting groundwater within the source protection zones (SPZs) on site. The Applicant provided the following information in **ES Volume 2, Chapter 10: Land, Soil and Groundwater [APP-046]:** The methodology for assessing groundwater receptors is provided, and the chapter presents the baseline conditions with respect to sensitive groundwater receptors. This includes information from **ES Volume 4, Appendix 10.1: Preliminary Risk Assessment [APP-124 to APP-126]** that a moderate to low risk to groundwater has been identified and requires further assessment. Specifically, this comment notes that groundwater in the principal aquifer and SPZs could be affected by potential contamination from agricultural land use, contamination in made ground, accidental release of fuel, oil or chemicals or contamination in historical landfill sites. Potential contamination pathways that were identified included leaching of contaminants, percolation to the aquifer, lateral migration and run-off/drainage, or migration pathways created via piling into bedrock. The superficial geological units within the study area are classified as secondary A aquifers and secondary undifferentiated aquifers. The bedrock geological units are classified as a principal aquifer.

ID	Theme	Comment	Response
		The Agency noted that HDD crossings were proposed at several points within SPZ1 and SPZ2 areas, including RD03 (within SPZ1), and RW01, RD02, UT01, RD01, WCPRUT01, WCPR02, and WC03 (within SPZ2). Sensitive receptors included numerous SPZs at the site, such as the Cottingham SPZs, and a licensed groundwater abstraction (2/26/32/060) near the cable route, which was not mentioned in the report. Pre-construction surveys were planned, but the Agency expected hydrogeological receptors to be included. Commitments indicated HDD would be used at minimum depths of 5m below public highways and 7m beneath railway lines and the River Hull, likely encountering groundwater within superficial deposits, which are in continuity with the Chalk Principal aquifer.	Groundwater abstraction locations are listed, which includes both licensed and unlicensed private water supplies (see also response to **Relevant Representation ID: EA09**). SPZ2: Field E16 has a small area of groundwater SPZ2 (outer protection zone) in part of the south western corner of the field. SPZ3: -There is a total catchment SPZ (Zone 3) very close to the western edge of Fields B2, B3, B4 and B8, and the western edge of Land Area C. -The western part of Land Area B (Fields B1 and B7) is within a total catchment SPZ (Zone 3). -All fields within Land Areas D, E and F are within a total catchment SPZs (Zone 3). Grid connection cable route: The grid connection cable route passes through areas of groundwater SPZ 1, 2 and 3. Although it may have been interpreted that this information was not given sufficient emphasis, the Applicant takes its responsibility in respect of maintaining the quality of groundwater very seriously. All mitigation measures relating to preventing pollution will be protective of the groundwater (whether that groundwater be defined

ID	Theme	Comment	Response
			as the very highest sensitivity, or lower sensitivity), which relates to issues involving existing known or unexpected contamination, or potential pollution that could be introduced by the activities of the Proposed Development. The Relevant Representation requests that the preparation of Hydrogeological Risk Assessments, which should be specific to the positions of the HDD crossings. A site investigation survey will determine the need for a Hydrogeological Risk Assessment; this would be managed through a Construction Environmental Management Plan. It is noted within the Relevant Representation that at the expected depths for the HDD crossings (a minimum depth of 5m below public highways and 7m beneath railway lines and the River Hull), it is very likely that groundwater within the superficial deposits will be encountered. Some of the proposed HDD crossings are located on the sand and gravels superficial aquifer which is likely to be in direct continuity with the Chalk Principal aquifer. It should be noted that the Applicant has committed to undertaking intrusive site investigation work, which will provide current site-specific information on the existing groundwater conditions at the HDD crossings. There will also be information available

ID	Theme	Comment	Response
			from the wider site investigation that will provide details of whether there are any existing potential contamination sources. This set of data from the intrusive works will be reviewed to present a refined conceptual site model for the Proposed Development. This will allow any outstanding potential risks to be identified, and at this point it can be determined which (if any) of the HDD crossing points require further assessment in terms of risks to groundwater. The need for specific crossing point Hydrogeological Risk Assessments could then be determined on a site-by-site basis, with consultation and agreement from East Riding of Yorkshire Council, the Environment Agency and Yorkshire Water Services. **ES Volume 2, Chapter 10: Land, Soil and Groundwater [APP-046]** references the Environment Agency guidance 'the Environment Agency's approach to groundwater protection' (Version 1.2, 2018) and 'the Environment Agency, protect groundwater and prevent groundwater pollution' (August 2024) and these documents will be used to draft the Construction Environmental Management Plan. This will ensure that sufficient mitigation to pollution is incorporated into the design.

ID	Theme	Comment	Response
			It is noted that the proximity of licensed groundwater abstraction located at Long Lane, Beverley Parks (licence number 2/26/32/060) to the proposed grid connection cable route is not specifically mentioned in **ES Volume 2, Chapter 10: Land, Soil and Groundwater [APP-046]**. Based on this Relevant Representation, a review of the information provided relating to groundwater and surface water abstraction locations has been undertaken. The location in question is a licensed abstraction point, which has two separate recorded grid references: 505500 436800 (approximately 145m from the Order Limits) and 505490 436850 (approximately 133m from the Order Limits). During the course of the review, it was found that some locations that are now outside the study area set out in **ES Volume 2, Chapter 10: Land, Soil and Groundwater [APP-046]** had been included in error and amendments were made to the distances from the Order Limits for some of the entries. **ES Volume 2, Chapter 10: Land, Soil and Groundwater [APP-046]** has been updated with a revised list which shows the water abstractions (surface water and groundwater; licensed and unlicensed) that are present within the study area for groundwater receptors, which is up to 500m from the Order Limits. Although the location mentioned in the Relevant Representation is not specifically discussed in the text of **ES Volume 2,**

ID	Theme	Comment	Response
			Chapter 10: Land, Soil and Groundwater [APP-046], it is covered by the assessment of risks to groundwater abstraction points that is provided in that chapter and therefore any potential effects on this receptor have been considered, with appropriate mitigation provided. It should also be noted that, although the revised list of the relevant receptors is included in the chapter, the change to some of the details within this dataset does not affect the outcome of the assessment presented in **ES Volume 2, Chapter 10: Land, Soil and Groundwater [APP-046]**, as there are now a smaller number of affected receptors, and there is now only one surface water abstraction location and no groundwater abstraction locations within the Order Limits, with all other assessed abstraction locations outside the Order Limits but within 500m of the Order Limits boundary).
RR-005	**Other Documents** Additional measures needed within the Outline Construction Environmental Management Plan (oCEMP) to cover mammal	The Environment Agency noted that the construction measures described in the Outline Construction Management Plan mentioned the need for an adequate water supply on site for effective dust and particulate matter suppression, using non-potable water where possible, including during demolition and wheel washing operations. However, no specific water supply had been identified anywhere in the application.	The Applicant notes the comment and the need to appraise water supply sources and secure adequate licences early in the pre-construction programme. The Applicant is exploring existing mains in the area and seeking to identify nearby suitable extraction locations. Should no suitable mains extraction points be identified all water will be bought in from off site. The Applicant has produced a standalone water resources note (see **Appendix 1 - Water Resources Technical Note** to this document)

ID	Theme	Comment	Response
	entrapment, protection of sensitive groundwater receptors and water supply for consumptive uses.	The Agency highlighted that accessing mains water supply in remote areas or at multiple construction compounds could be impractical. Relying on tankered water would increase local road traffic, and abstracting water from local surface sources would require an abstraction licence from the Environment Agency. They recommended that the Applicant develop a water supply strategy early in the planning phase to appraise different sources of supply, including the potential need to abstract water for dewatering. The Agency emphasised that it remained the Applicant's responsibility to identify and secure all necessary licences before construction commenced.	
RR-005	**Other Documents** The Environment Agency stated that additional measures are needed within the Outline	The Environment Agency identified that the Outline Construction Environmental Management Plan included a measure stating that if land drains were damaged during construction, they should be recorded and geolocated for potential restoration during decommissioning. However, no risk assessment for	The **Outline CEMP [EN010157/APP/7.2 Revision 2]** has been updated and submitted at Deadline 1 to include a commitment to complete a risk assessment of damaged land drains. If mitigation is required to protect controlled waters, this will be secured through the detailed Construction Environmental Management Plan.

ID	Theme	Comment	Response
	Construction Environmental Management Plan (oCEMP) to cover mammal entrapment, protection of sensitive groundwater receptors and water supply for consumptive uses.	damaged land drains had been completed. The Agency noted that damaged land drains could cause long-lasting environmental issues. They requested that the oCEMP be updated to include a risk assessment of damaged land drains to determine whether mitigation measures were necessary to protect controlled waters.	
RR-005	**Other Documents** The Environment Agency sated that clarification is required for the approach to underground cables at decommissioning.	The Environment Agency stated that the Outline Decommissioning Environmental Management Plan assumed below ground cables would be left in situ at the end of the project's life, as noted in Paragraph 3.3.2. The Agency highlighted the potential risk that these cables could pose as a source of groundwater contamination if left in place. They advised that the Decommissioning Environmental Management Plan should include an environmental risk assessment to be completed prior to the decommissioning phase. This assessment should evaluate	The **Outline DEMP [EN010157/APP/7.4 Revision 2]** has been updated and submitted at examination Deadline 1 to include the commitment for an environmental risk assessment to be completed prior to the decommissioning phase for cables left in situ.

ID	Theme	Comment	Response
		the best environmental options and determine the final approach. If the Applicant intended to leave the cables in situ indefinitely, they would need to demonstrate that doing so would not result in a potentially significant source of contamination to controlled waters.	
RR-005	**Other Documents** The Environment Agency stated that updates are required within the Soil Management Plan to ensure a robust remediation strategy.	The Environment Agency stated that the Outline Soil Management Plan, as presented in paragraphs 1.1.5 to 1.1.6 [APP-159], lacked sufficient detail on how remediation would be undertaken in accordance with the relevant guidance. Although Requirement 6 secured the submission of a detailed Soil Management Plan and intrusive site investigation was required to investigate potential contaminant linkages, the Agency was concerned that the Outline Plan did not adequately describe how potential impacts to groundwater would be remediated or how risks from contamination would be managed. They requested that the Outline Soil Management Plan be updated to clearly detail how any necessary remediation would comply with the Environment Agency's *Land Contamination Risk*	The **Outline Soil Management Plan [EN010157/APP/7.8 Revision 2]** has been updated and submitted at examination Deadline 1 to state that any remediation of contamination that is determined to be necessary prior to construction works commencing for the Proposed Development would be carried out in accordance with the Environment Agency Land Contamination Risk Management guidance. The Applicant will ensure that the Environment Agency is added as a named consultee on any remediation strategies. The Soil Management Plan will include reference to the Environment Agency's Land Contamination Risk Management guidance. The requirements for the site investigation, risk assessment, and any necessary remediation works will be included in **Commitments Register [EN010157/APP/6.4 Revision 2]**.

ID	Theme	Comment	Response
		Management (LCRM) guidance. Additionally, they asked to be named as a consultee for any remediation strategies. The Agency noted that potential contaminant linkages had been identified in the Preliminary Risk Assessment and would be examined through targeted site investigations. They expected the detailed Soil Management Plan to include reference to the LCRM guidance and for the associated site investigation, risk assessment, and remediation measures to be captured within the Commitments Register.	
RR-005	**ADDITIONAL ADVICE**	The Environment Agency stated in Appendix B – Additional Advice that the submission had referred to the East Riding of Yorkshire Local Plan 2016. However, they noted that this had since been superseded by the East Riding of Yorkshire Council Local Plan Update 2025–2029, which was adopted in April.	At the time the DCO Application was submitted, the updated Local Plan was yet to be adopted. As such, reference throughout the application documents is to the adopted East Riding Local Plan 2016 as this was the adopted version at the time of submission. Notwithstanding this, the DCO Application is supported by Policy Accordance Tables at Appendix 1 to the **Planning Statement [APP-147],** Table 5 of which includes the East Riding Local Plan and addresses both the adopted (at the time) 2016 Local Plan as well as the Emerging Local Plan, an iteration which has since been adopted. The Applicant has reviewed the adopted version of the Updated Local Plan and does not consider

ID	Theme	Comment	Response
			there are any material differences to the text included in the Policy Accordance Table or the conclusions which accompany them.
RR-005	**ADDITIONAL ADVICE**	The Environment Agency stated that they had noted the Applicant had addressed the requirement for the Sequential Test within the Planning Statement [APP-147]. However, they clarified that it was not within their remit to determine whether the Sequential Test had been passed.	This is noted.
RR-005	**ADDITIONAL ADVICE**	The Environment Agency stated that they had noted the mink control measures proposed by the Applicant. They advised the Applicant to consult the Waterlife Recovery Trust mink project to explore opportunities for aligning their measures with broader catchment-wide initiatives. Additionally, they requested that details of any mink captured be shared with the Yorkshire Wildlife Trust, which is coordinating a large-scale mink control programme in East Yorkshire and is aiming to expand the initiative further.	The Applicant welcomes consultation with the Yorkshire Wildlife Trust to discuss whether a collaborated approach with their existing project is a viable option.
RR-005	**ADDITIONAL ADVICE**	The Environment Agency stated that Commitments 219 and 220 within Environmental Statement Volume 4: Commitments Register [APP-095] referred to the potential requirement for a	The updated guidance is noted and will be used to inform any piling and penetrative ground improvements on land affected by contamination.

ID	Theme	Comment	Response
		piling risk assessment for certain elements of the proposed works. They noted that the relevant guidance document, *"Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention,"* had been updated in April 2025 and advised the Applicant to ensure the most recent version was used in developing any piling risk assessments.	
RR-005	**ADDITIONAL ADVICE**	The Environment Agency stated that if any material were to be removed from the site, the waste classification procedure would apply. They highlighted that excavated soils could be classified as hazardous or non-hazardous depending on their hazardous property concentrations, which would affect both the documentation required and the type of facility to which the waste could be transferred. To ensure correct classification, chemical analysis should be undertaken in accordance with a suitable waste sampling plan. This process would also apply to any excavated contaminated materials, helping to ensure waste is properly managed and directed to an appropriate site.	The details provided by the Environment Agency relating to the waste classification procedure for any material to be removed from the Site as waste are noted. The Applicant will undertake any necessary waste classification testing on waste soils appropriately, in line with the industry guidance (WM3, as referred to in the Environment Agency comment). It is noted that this is also applicable for any contaminated material that may be encountered and require removal from the Site. Further to this, although it is intended that any excavated material will be reused on-site, if there is any requirement to import of materials to the Site, appropriate waste exemptions or environmental permits will be obtained by the Applicant.

ID	Theme	Comment	Response
		Although the Applicant proposed that all excavated material would be reused onsite, the Agency advised that if any waste were to be imported to the site, a relevant waste exemption or environmental permit might be required. They referred the Applicant to the *Waste Classification Technical Guidance WM3* for further information.	
RR-005	**Appendix C Summary of EA Position**		

Table 2-6: Forestry Commission Relevant Representation

ID	Theme	Comment	Response
RR-006	General	The Forestry Commission did not express support or objection to the Proposed Development and provided guidance regarding the potential impacts on woodland within the application area. They highlighted that ancient woodlands, ancient and veteran trees are irreplaceable habitats with high ecological and cultural value due to their long-standing continuity and minimal disturbance. In accordance with paragraph 186c of the National Planning Policy Framework (NPPF), development resulting in the loss or deterioration of these habitats should be refused unless there are "wholly exceptional reasons" and a suitable compensation strategy is in place. The Commission referred to key Government policy documents, including the joint standing advice from the Forestry Commission and Natural England, as well as *Keepers of Time – A Statement of Policy for England's Ancient and Native Woodland*. They recommended that any development near ancient woodland include a buffer zone of at least 15 metres to avoid root and habitat damage. Where impacts (e.g., from pollution or construction) may extend further, a larger buffer may be required.	The Applicant notes this comment. As secured within the **Outline LEMP [EN010157/APP/7.5 Revision 3]** the Proposed Development design incorporates a minimum offset distance of 15m from any existing ancient woodland or veteran trees, where reasonably practicable. For instances where it is not possible to maintain a 15m offset from works (see **ES Volume 4, Appendix 7.11: Arboricultural Impact Assessment [APP-115]** for details), appropriate measures would be in place, as secured in the **Outline LEMP [EN010157/APP/7.5 Revision 3]**, to avoid or minimise impacts, including installation of tree protection fencing prior to works commencing and, where relevant, undertaking works under arboricultural supervision and using 'no dig' construction methods to protect the soil from compaction and minimise root impacts.

ID	Theme	Comment	Response
RR-006	Ecology and Wildlife	The Forestry Commission highlighted that non-ancient woodland is present within the Proposed Development area and referred to NPPF paragraph 131, which advises that planning decisions should retain existing trees wherever possible.	The Applicant notes this comment. As secured within the **Outline LEMP [EN010157/APP/7.5 Revision 3]** the Proposed Development design incorporates a minimum offset distance of 10m from any existing non-ancient woodland, where reasonably practicable.
RR-006	Ecology and Wildlife	The Forestry Commission emphasised that their primary concern is ensuring the proposed development causes no loss or harm to ancient woodland. They welcomed ongoing dialogue and offered to engage further on any future planning applications for the site. They encouraged the Applicant to reach out with any questions or to arrange a follow-up meeting.	The Applicant notes these comments.

Table 2-7: Historic England Relevant Representation

ID	Theme	Comment	Response
RR-007	General	Historic England, the Government's statutory adviser on the historic environment, confirmed its role as a statutory consultee for Nationally Significant Infrastructure Projects and its intention to register as an Interested Party in the Peartree Hill Solar Farm DCO process. Established under the National Heritage Act 1983, Historic England's remit includes the protection and promotion of ancient monuments, historic buildings, conservation areas, and public engagement with heritage. While Historic England does not object in principle to the Proposed Development, it stressed the importance of fully considering the potential impacts on the historic environment. It encourages the developer to minimise harm to heritage assets, explore opportunities for meaningful mitigation, and ensure that public benefits - such as education, outreach, and legacy engagement - are proportionate to the scale and impact of the scheme.	The Applicant notes these comments.
RR-007	Archaeology	Historic England noted six nationally important heritage assets in or near the project area. These are:	The Applicant notes these comments.

ID	Theme	Comment	Response
		• NHLE 1007843 Meaux Cistercian Abbey – scheduled monument • NHLE 1008039 Moated Kiln – scheduled monument • NHLE 1015305 Meaux Duck Decoy – scheduled monument • NHLE 1000921 Burton Constable – grade II* Park and Garden. • NHLE 1083444 Burton Constable Hall – grade I Listed Building • NHLE 1366245 Stables and carriage house approximately 20 metres to south-east of Burton Constable Hall – grade I Listed Building The development does not propose physical impacts on these sites. No archaeological intervention is required for them, and Historic England supports the proposed archaeological strategy, deferring to the Local Authority Principal Archaeologist on other matters.	
RR-007	Archaeology	Historic England considered the assessment of significance and impacts in the Peartree Hill Solar Farm Detailed Settings Impact	The Applicant notes these comments.

ID	Theme	Comment	Response
		Assessment (APP-123) to be proportionate and accurate.	
RR-007	Archaeology	Historic England agreed the Proposed Development would cause less than substantial harm - at the lower end - to the significance of nearby designated heritage assets, primarily through impacts on their setting. While the development surrounds several scheduled monuments, the key heritage assets at Burton Constable lie outside the proposed blocks. Historic England found the Applicant's assessments of setting and significance accurate and comprehensive, and considers the level of harm acceptable and appropriately mitigated.	The Applicant notes these comments.
RR-007	Archaeology	Historic England recommended that the Applicant include climate-resilient species in the proposed planting scheme (APP-128) to ensure long-term screening around the scheduled monuments. They note that existing vegetation's health and vulnerability (e.g., to Ash Dieback) should be assessed, as its decline could increase the visibility of the solar infrastructure and therefore the level of harm to the heritage assets' setting.	As stated in the **Outline LEMP [EN010157/APP/7.5 Revision 3]**, new planting will consist of native, indigenous species that are suitable for the Site conditions both now and in the future and, wherever possible, are from local provenance. Detailed information on how new vegetation will be managed and monitored is provided in the **Outline LEMP [EN010157/APP/7.5 Revision 3].** Table 10-3 confirms the monitoring, maintenance and replacement of new hedgerow planting within the first 5 years, at which point the hedgerows would be considered to have established.

ID	Theme	Comment	Response
			It is anticipated that details of the proposed planting mix would be decided at the detailed landscape design stage. Requirement 9 of Schedule 2 to the **Draft DCO [EN010157/APP/3.1 Revision 4]** secures the submission, approval by the local planning authority and implementation of the Landscape and Ecological Management Plan ahead of commencement on the authorised development. It also ensures that the final Landscape and Ecological Management Plan must be substantially in accordance with the **Outline LEMP [EN010157/APP/7.5 Revision 3]**. The **Draft DCO [EN010157/APP/3.1 Revision 4]** has been updated (and is submitted alongside this document at Deadline 1) to state that Historic England would be consulted for matters relevant to their function in the development of the Landscape and Ecological Management Plan.
RR-007	Archaeology	Historic England agreed that the listed buildings and gardens at Burton Constable Hall are too distant from the Proposed Development for any intervisibility, including from the first floor of the Hall.	The Applicant notes these comments.
RR-007	Archaeology	Historic England confirmed they were involved in detailed pre-application discussions and agreed with the Applicant on the assessment	The Applicant notes these comments.

ID	Theme	Comment	Response
		methodology and definitions of impact on significance.	
RR-007	Cultural Heritage	Historic England stated that while green energy infrastructure offers public benefit, many recent projects across North and East Yorkshire - such as wind and solar farms - have caused significant landscape-scale change. They noted that the level of public benefit often does not reflect the scale of development or associated archaeological mitigation. Historic England encourages developers to provide more proportionate, creative, and lasting cultural heritage engagement, including during construction and as part of legacy initiatives.	The **Archaeological Management Strategy [EN010157/APP/7.11 Revision 2]** confirms the Applicant's commitment to delivering appropriate archaeological mitigation fieldwork in consultation with the Development Management Archaeologist for East Riding of Yorkshire Council. Requirement 13 of Schedule 2 to the **Draft DCO [EN010157/APP/3.1 Revision 4]** ensures that no part of the authorised development is to be commenced until a written scheme of investigation, which will be substantially in accordance with the archaeological management strategy, for that part has been submitted to and approved by the local planning authority. Further to discussions to date, the Applicant will continue to work with a competent community archaeology provider, Humber Field Archaeology, Historic England and other relevant stakeholders to develop and deliver a programme of public outreach and community engagement should consent be granted.
RR-007	Cultural Heritage	Historic England stated that the Proposed Development presents valuable opportunities for public engagement, landscape enhancement, and partnership working. They	Further to discussions to date, the Applicant will continue to work with a competent community archaeology provider, Humber Field Archaeology, Historic England and other relevant stakeholders

ID	Theme	Comment	Response
		support the public outreach and community engagement proposals in APP-045 (Table 9.1, pages 6, 9, and 10) relating to the Meaux Cistercian monastic site, and recommend these be actively developed and supported during construction and as legacy activities beyond the Proposed Development's lifespan.	to develop and deliver a programme of public outreach and community engagement focussed on the local population's historic and present relationship to sunlight and wetland landscapes should consent be granted. The Applicant proposes the incorporation of information boards on the heritage of the local area, in the vicinity of, and to allow public access to, Scheduled Monuments NHLE 1007843 (Site of Meaux Cistercian Abbey) and NHLE 1015305 (Meaux Duck Decoy, 420m south west of Meaux Decoy Farm) (see **ES Volume 3, Figure 3.4: Indicative Environmental Masterplan [APP-058]**).
RR-007	Archaeology	Historic England stated that while the Proposed Development is a significant intervention in the East Yorkshire landscape, the Applicant has proposed acceptable mitigation measures (APP-045, Table 9-8) to reduce impacts on the three scheduled monuments to an acceptable level. They suggest that incorporating climate-resilient planting would strengthen this mitigation. Moreover, implementing the proposed public engagement and outreach activities could deliver lasting heritage benefits, going beyond mitigation to improve the overall planning balance.	As stated above, the **Outline LEMP [EN010157/APP/7.5 Revision 3]** includes a commitment to provide new planting that consists of native, indigenous species that are suitable for the Site conditions both now and in the future and, wherever possible, are from local provenance. The **Draft DCO [EN010157/APP/3.1 Revision 4]** has been updated (and is submitted alongside this document at Deadline 1) to state that Historic England would be consulted for matters relevant to their function in the development of the Landscape and Ecological Management Plan.

ID	Theme	Comment	Response
			Again as stated above, further to discussions to date, the Applicant will continue to work with a competent community archaeology provider, Humber Field Archaeology, Historic England and other relevant stakeholders to develop and deliver a programme of public outreach and community engagement focussed on the local population's historic and present relationship to sunlight and wetland landscapes should consent be granted.

Table 2-8: Humberside Police Relevant Representation

ID	Theme	Comment	Response
RR-008		Humberside Police stated their wish to register their interest in the Proposed Development.	No response required.
RR-008	Security	Humberside Police confirmed they had no concerns regarding the Proposed Development.	The Applicant notes these comments.
RR-008	Security	Humberside Police stated they provided pre-application security advice to the Applicant, covering fencing, surveillance, forensic marking, cable and panel protection, equipment security, and staffing. They confirmed that they received a response from the Applicant confirming planned security measures.	The Applicant thanks Humberside Police for their engagement at the pre-application stage. The recommendations have been carefully considered by the Applicant. Security has been a key consideration in the design of the Proposed Development from the outset. In response to the specific areas of advice provided, the following can be confirmed: Fencing and Gate Security: Operational areas of the site will be enclosed with 2m wire and post deer fencing—while substations will be secured with 2.4m palisade fencing. These measures aim to prevent unauthorised access and are consistent with the standards highlighted in Humberside Police's advisory notes. Further, the detailed design stage will take into account specifications regarding visibility, anti-reflective coatings, and the need to avoid gaps while incorporating features such as mammal gates, as outlined in the **Outline LEMP [EN010157/APP/7.5 Revision 3].** The detailed

ID	Theme	Comment	Response
			design of permanent and temporary fencing will be submitted and approved by the local authority prior to commencement of development as part of **Requirement 11** of **Draft DCO [EN010157/APP/3.1 Revision 4]**. Video Surveillance Systems: CCTV will be installed throughout the site to monitor activity and enhance overall security. Cameras will be focused on operational areas and access points, which will be limited to secure, designated locations for use by authorised personnel only. Forensic Marking: These measures will be considered during detailed design and implemented as appropriate. Construction compounds will be secured, include manually operated lighting, and remain closed to the public. Operationally, fencing, CCTV, and motion-sensor lighting will be in place to maintain security. Cable and Solar Panel Protection: The Applicant recognises the importance of securing cable drums overnight, promptly installing cables, and applying serial numbers, ownership details, and forensic marking. During construction, the principal contractor will be responsible for securing all stored materials and equipment. Measures will include secure storage, lighting

ID	Theme	Comment	Response
			systems, CCTV, hazard warning signs, and regular patrols by site security staff. Additional measures such as cable guards and anti-theft fixtures will be implemented where appropriate. Full details are provided in **ES Volume 1, Chapter 3: Proposed Development Description [APP-039].** Equipment and Tool Security: Temporary compounds will be established within each land parcel for storing materials, plant, and equipment. These compounds will be equipped with CCTV, lighting, alarm systems, and secure storage. Forensic marking, asset logs with serial numbers, and the use of third-party locking devices will also be employed. Site security staff and warning signage will be present, and keys will be stored securely and separately from equipment. Procedures for escalation in the event of any breaches or criminal activity have been established, with police or relevant authorities to be contacted in accordance with the processes outlined in the **Outline CEMP [EN010157/APP/7.2 Revision 2], Outline Operational Environmental Management Plan (OEMP) [EN010157/APP/7.3 Revision 2],** and the **Outline DEMP [EN010157/APP/7.4 Revision 2].**

Table 2-9: National Gas Transmission Limited Relevant Representation

ID	Theme	Comment	Response
RR-009		This relevant representation is submitted on behalf of National Gas Transmission Plc ("NGT") in respect of the Peartree Hill Solar Farm DCO, and in particular NGT's infrastructure and land which is within or in close proximity to the proposed Order Limits.	No response required.
RR-009	Assets	NGT stated that it requires protection for its retained apparatus, ensuring compliance with relevant standards for nearby works. It emphasised the need to maintain full access rights for inspection, maintenance, renewal, and repair. If the Applicant intends to acquire land, rights, or interfere with NGT's assets or interests, further discussions will be necessary to secure appropriate safeguards. NGT confirmed it owns and operates gas transmission infrastructure within the proposed Order Limits, specifically **Feeder 29 – Ganstead to Asselby**.	The Applicant is in ongoing discussions with NGT regarding the protective provisions and will continue to engage with NGT to agree to the protective provisions for the benefit of NGT prior to the close of the Examination.
RR-009	Land	NGT highlighted inaccuracies in the Book of Reference, noting that it has not been correctly listed for several plots where its transmission pipeline (Feeder 29) is present. Specifically, plots 12-8, 13-3 to 13-8, and 14-1 involve proposed permanent land acquisition or imposition of rights, yet NGT is omitted. Instead, Northern Gas	The Applicant received an email on 15.04.25 from their solicitor providing details of apparatus owned by NGT in various plots requiring to be noted in DCO documentation and requesting changes be made to the Book of Reference.

		Networks is incorrectly referenced. NGT has requested corrections via its solicitors to ensure its interests are properly represented and not prejudiced.	These amendments have been made in the revised **Book of Reference [EN010157/APP/4.2 Revision 4]** submitted at Deadline 1.
RR-009	DCO	NGT stated that, as a statutory undertaker, its primary obligation is to ensure that its infrastructure and statutory duties are not adversely affected by the proposed development. Therefore, it seeks to protect its assets and land interests located within or near the draft Order Limits.	The Applicant acknowledges NGT's responsibilities and will continue to liaise with NGT so that adequate protective for the benefit of NGT are agreed prior to the close of the Examination.
RR-009		NGT emphasises that its rights to retain, access, and maintain its apparatus within or near the Order Limits must be preserved at all times. It requires protective provisions in the DCO to safeguard its assets and ensure safety compliance. NGT is in ongoing discussions with the Applicant regarding these provisions and any necessary supplementary agreements. NGT expects continued engagement to ensure its assets are protected and will keep the Examining Authority informed of progress during the Examination.	The Applicant is in ongoing discussions with NGT regarding the protective provisions and will continue to engage with NGT to agree to the protective provisions for the benefit of NGT prior to the close of the Examination.
RR-009	Assets	NGT notes that if the Applicant seeks to acquire land or rights affecting NGT's interests, further discussions are required. NGT reserves the right to make additional representations during the Examination regarding its assets but will continue	The Applicant is in ongoing discussions with NGT regarding the protective provisions and will continue to engage with NGT to agree to the protective provisions for the benefit of NGT prior to the close of the Examination.

		engaging with the Applicant to reach a satisfactory agreement.	

Table 2-10: National Grid Electricity Transmission Plc Relevant Representation

ID	Theme	Comment	Response
RR-010		NGET stated that the Proposed Development involves the construction, operation, maintenance, and decommissioning of a solar photovoltaic (PV) array and Battery Energy Storage System (BESS), including substations and underground cabling connecting to the Northern Power Grid via NGET's Creyke Beck Substation. NGET emphasises the need to protect its infrastructure and statutory obligations, requesting appropriate safeguards and ongoing engagement to ensure the project does not adversely affect the electricity transmission network.	No response required.
RR-010	Land	NGET noted that the Applicant is seeking temporary and permanent rights over several land parcels containing NGET infrastructure (plots 17-3, 17-5, 17-7, 17-8, and 17-11 to 17-23, linked to Work Numbers 5, 6, and 8). NGET emphasised that its rights to access, inspect, maintain, renew, and repair its apparatus must be preserved at all times. Any interference with NGET's land or assets will require appropriate protections, and further discussions with the Applicant are necessary to address these issues.	10.10.23, landowner sent information on the Proposed Development as part of non-statutory consultation. Invitation was given to attend non-statutory consultation events and links to the Proposed Development's website were provided to view further information on the Proposed Development. 01.03.24, landowner sent Proposed Development introduction letter including draft cable easement HoTs, LIQ and survey access request. 01.03.24, The Applicant's Agent issued the Proposed Development

			introduction letter including draft cable easement HoTs, LIQ and survey access request. to the landowner. 13.05.24, S42 letter sent to landowner with Proposed Development update and notification of statutory consultation period and events/ information availability. 07.10.24, targeted consultation S42 letter sent to landowner with Proposed Development update / changes potentially affecting the landowner and notification of statutory consultation period information availability. 04.12.24, email to landowner's Estate contact to confirm contact details for land interest and statutory requirements of the Proposed Development. Response back from landowner's contact confirming can progress all matter on their behalf and providing solicitor's details. 09.12.24, email from Applicant's Agent with Proposed Development engagement letter and plans and request to arrange a Teams meeting to progress discussions. 18.12.24, email to landowner's Estate contact to provide The Applicant's legal contacts in relation to legal and statutory documents required. 08.01.24, email from The Applicant to landowner providing brief Proposed Development overview and requesting a meeting to progress matters.

			21.01.24, engineers' details provided by landowner's Estate contact so The Applicant can progress discussions directly with them about the Proposed Development and land interest rights required which will be part of the agreement being negotiated between the parties and subsequent emails arranging a meeting for 04.02.15 26.03.25, email to landowner's Agent to arrange a Teams meeting to progress land interest rights. 04.04.25, S56 letter sent to landowner with the Acceptance of Proposed Development update and notification of statutory period for interested parties and relevant representation. 15.04.25, email to landowner's Agent to arrange a Teams meeting to progress land interest right requirement negotiations. 30.04.25, email to landowner's Agent to arrange a Teams meeting to progress land interest right requirement negotiations. 07.05.25, response from landowner's Agent with availability. 09.05.25 emails from Applicant's Agent in relation to an initial Teams meeting on the 14.05.25, invite sent out and relevant documents distributed.

			14.05.25, Teams meeting held with landowner's Agent, Applicant's Agent and Applicant to discuss the Proposed Development and land interest right requirements. 14.05.25 Email from landowner's agent providing the guidance notes for the next step process. 30.05.25 email from Applicant's Agents providing minutes to Landowner's Agents. The Applicant has sent a number of correspondence and held a number of meetings with NGET's Property Team as summarised above (taken from the Statement of Negotiation document). Heads of terms for land agreements are under discussion and the Applicant is continuing to liaise with NGET regarding protective provisions.
RR-010	DCO	NGET stated that as a statutory undertaker, its priority is to uphold its legal obligations and safeguard existing and future infrastructure located within or near the draft Order Limits. To this end, NGET requires appropriate protections, including adherence to relevant standards for any works near its existing or proposed apparatus.	The Applicant is in ongoing discussions with NGET regarding the protective provisions and will continue to engage with NGET to agree to the protective provisions for the benefit of NGET prior to the close of the Examination.
RR-010	Assets	NGET outlined the key electricity infrastructure it owns or operated within or near the Proposed Development Order Limits. The details of the electricity assets are as follows: Substation	No response required.

		• Creyke Beck 132 kV Substation • Creyke Beck 400 kV Substation • Associated overhead and underground apparatus including cables Overhead Lines • YYW 275 kV OHL Creyke Beck - Salt End North Creyke Beck - Hedon • 4ZQ 400 kV OHL Creyke Beck - Keadby - Killinghome Creyke Beck - Humber Refinery - Keadby • 4ZR 400 kV OHL Creyke Beck - Thornton 1 Creyke Beck - Thornton 2 • Associated cable fibres	
RR-010	Assets	NGET noted that the Peartree Hill Solar Farm Order Limits overlap with or are close to land required for key future infrastructure projects. These include the Wanlass Beck Extension Project (upgrading Creyke Beck substation), the Birkhill Wood Substation Project (a new substation north of Creyke Beck), a new access road off the A1079 to support those works, and the North Humber to High Marnham (NHHM) Project, a proposed high-voltage transmission line from Creyke Beck to Nottinghamshire. These projects	The Applicant notes the comments and will continue to engage with NGET to minimise any potential disruption or conflicts.

		are essential for future generation connections and require land rights and consents.	
RR-010	Assets	NGET explained that the existing Creyke Beck 400 kV substation lacks the capacity to support new connections, prompting the need for the Wanlass Beck Extension Project and Birkhill Wood Substation Project - collectively referred to as the NGET Upgrade Projects. Due to existing layout constraints and ageing infrastructure, expanding the current substation without major disruption is not feasible. Instead, new infrastructure is planned adjacent to the existing substation. While the Birkhill Substation lies outside the Proposed Development Order Limits, a new Access Road - joining the site from the northwest - will support construction, maintenance, and operation of both the NGET Upgrade Projects and other third-party connection projects.	The Applicant notes the comments and will continue to engage with NGET to minimise any potential disruption or conflicts
RR-010	Assets	NGET outlined the North Humber to High Marnham (NHHM) Project, a major proposal to enhance the electricity transmission system between Cottingham and High Marnham. The project involves a new 400 kV transmission line approximately 90 km long, connecting the proposed Birkhill Wood and High Marnham substations. As part of the Great Grid Upgrade this project is essential to support growing renewable energy connections. NGET emphasised the need to safeguard land, rights, and infrastructure to	No response required.

		ensure successful delivery of the NHHM and other future projects.	
RR-010	DCO	NGET requested that protective provisions be included in the DCO to safeguard its existing and future infrastructure and ensure compliance with safety standards. It references the Awel y Môr DCO as a relevant precedent, where similar provisions were secured to protect NGET's future works at Bodelwyddan substation. NGET is currently in discussions with the Applicant regarding appropriate protective provisions. If no agreement is reached, NGET will submit its preferred draft provisions and detail any unresolved issues during the Written Representation Stage. NGET requested ongoing engagement with the Applicant to ensure that the proposed works under the Order will protect NGET's future assets and maintain all necessary access and rights for NGET to fulfil its statutory duties. NGET will continue discussions aiming to resolve these matters promptly during the DCO Examination and will keep the Examining Authority informed of progress.	The Applicant acknowledges NGET's responsibilities and will continue to liaise with NGET so that adequate protective for the benefit of NGET are agreed prior to the close of the Examination.

	DCO	NGET stated that if the Applicant seeks compulsory acquisition powers over NGET's land or rights, the Protective Provisions must ensure that the Applicant obtains NGET's consent before any such acquisition takes place.	The Applicant will continue to liaise with NGET so that adequate protective for the benefit of NGET are agreed prior to the close of the Examination.
RR-010		NGET stated that it reserves the right to make further representations as part of the Examination process in relation to specific interactions with its assets but in the meantime will continue to liaise with the Applicant with a view to reaching an agreed position.	No response required

Table 2-11: National Highways Relevant Representation

ID	Theme	Comment	Response
RR-011	Transport and Access	National Highways stated that the documents it has considered are: • Transport Assessment – Feb 2025; • Outline Decommissioning Environmental Management Plan – Feb 2025; and • Outline Construction Traffic Management Plan – Feb 2025.	The Applicant notes this comment.
RR-011	Transport and Access	National Highways (NH) stated that the Proposed Development will have no significant impact on the Strategic Road Network (SRN) during its daily operation due to the minimal staff presence required once operational.	The Applicant notes this comment.
RR-011	Transport and Access	NH acknowledged that the figures applicable to construction staff and associated movements largely align to the data presented at project scoping.	The Applicant notes this comment.
RR-011		National Highways stated that the construction impact during the peak period is expected to be minimal and can be effectively managed using the strategies outlined in the Outline Construction Traffic Management Plan (CTMP).	The Applicant notes this comment.
RR-011	Transport and Access	National Highways recommended that a detailed Construction Traffic Management Plan (CTMP), secured through a planning requirement, be produced to ensure construction staff and	The **Outline Construction Traffic Management Plan (CTMP) [EN010157/APP/7.7 Revision 2]** will be developed into a Construction Traffic Management Plan prior to the start of construction works.

ID	Theme	Comment	Response
		deliveries are scheduled to minimise impact on the Strategic Road Network during peak AM and PM periods.	The preparation of a CTMP, in substantial accordance with the outline CTMP, is secured through Requirement 5 of the **Draft DCO [EN010157/APP/3.1 Revision 4].** The Applicant confirms this will provide details of the anticipated time periods of construction traffic affecting the SRN. As set out in paragraph 3.3.16 of the **Outline CTMP [EN010157/APP/7.7 Revision 2]**, the expected shifts result in construction staff vehicle movements between 06:00-07:00 and 19:00-20:00 which are likely to be outside the network peaks for the SRN. Requirement 5 of the **Draft DCO [EN010157/APP/3.1 Revision 4]** also ensures that NH is consulted before the finalisation of the CTMP.
RR-011	Transport and Access	National Highways stated that the detailed CTMP should include a construction staff trip monitoring plan to track adherence to shift schedules and outline corrective actions if construction traffic exceeds agreed limits.	As set out in Section 8 of the **Outline CTMP [EN010157/APP/7.7 Revision 2]**, the Construction Traffic Management Plan will set out what data will be collected by the Principal Contractor to monitor trips to/from the Site and what measures will be implemented should state levels of vehicle trips be materially exceeded. Requirement 5 of the **Draft DCO [EN010157/APP/3.1 Revision 4]** ensures that NH is consulted on the CTMP before it is finalised.

ID	Theme	Comment	Response
RR-011	Transport and Access	National Highways stated that the Outline Decommissioning Environmental Management Plan provides a suitable framework to manage potential impacts on the SRN during site decommissioning. They recommend that a detailed DEMP be required as a condition of any permission and that it aligns with relevant planning policies at the time of decommissioning.	The preparation of a Decommissioning Environmental Management Plan is secured through Requirement 15 of the **Draft DCO [EN010157/APP/3.1 Revision 4]** and will take place closer to the time of the decommissioning. Requirement 15(3) sets out that the DEMP must be substantially in accordance with the **Outline DEMP [EN010157/APP/7.4 Revision 2].** The **Outline DEMP [EN010157/APP/7.4 Revision 2]** recognises the need for futureproofing, for example at paragraph 3.15.2 reference is made to adhering to best practice measures that are current at the time, and notes the possibility of policy being superseded ahead of decommissioning. The Applicant also notes that Requirement 15(2) of the draft DCO requires the local planning authority to approve the **Outline DEMP [EN010157/APP/7.4 Revision 2]**. Decommissioning cannot begin until this approval is given. Undoubtedly the local planning authority will, as part of their determination process, have regard to the current planning policy of the time as far as it interfaces with the DEMP as well as any other relevant factors including any other permissions impacting the facility.
RR-011	DCO	National Highways confirmed that the draft Development Consent Order (Feb 2025) includes suitable wording in Requirement 5 (CTMP) and Requirement 15 (DEMP), providing assurance	The Applicant notes this comment and welcomes this confirmation.

ID	Theme	Comment	Response
		that detailed Construction and Decommissioning Environmental Management Plans will be secured to manage the facility's impact on the SRN.	
RR-011	Transport and Access	National Highways stated it does not object to the delivery of the DCO.	The Applicant notes this comment.

Table 2-12: Natural England Relevant Representation

ID	Summary	Comment	Response
RR-012	**Internationally designated sites** Natural England stated that it is not yet satisfied that there is enough evidence to conclude the project would avoid adverse effects on the Humber Estuary SPA, SAC, and Ramsar sites. Further information is needed to assess the potential loss of functionally linked land for qualifying bird species, particularly regarding core mitigation areas and the implementation of	Natural England stated that, regarding the Humber Estuary SPA and Ramsar sites, there is a risk of losing functionally linked land for qualifying bird species during both construction and operation. While they welcome the commitment in the Outline Landscape and Ecological Management Plan to provide mitigation areas for non-breeding birds, they advise that the proposed measures may not be sufficient. They stress the need for each parcel of land to be designed for the intended species using ecological evidence, and reiterate their advice that all core mitigation areas should have a 150 m buffer to protect their integrity. If a 150 m buffer is not possible, further assessment is needed to ensure the size, suitability, and openness of core habitat (particularly for species like golden plover and lapwing) is adequate. They note that fields near solar panels may be less used by birds and this should be factored into calculations. Natural England also highlight discrepancies in stated mitigation areas and request clarification that the total is 38.68 ha, and they require further details on how	The bird days calculation has been amended to take account of the cable route survey data and is presented in Appendix E of the updated **Outline LEMP [EN010157/APP/7.5 Revision 3]**. The **Outline LEMP [EN010157/APP/7.5 Revision 3]** has also been updated to provide further assessment of the suitability of each mitigation areas (see below), including additional information regarding the potential increase in carrying capacity of each mitigation area for the intended species through the creation of wader scrapes and flower rich neutral grassland, in addition to the 'bird days' calculations. The Applicant acknowledges that Natural England advises that the Humber Estuary designated sites mitigation areas should be surrounded by a buffer of 150m, within which the land use is secured for a purpose which will not affect the integrity of the mitigation areas. The Applicant also acknowledges that Natural England advise that if a 150m buffer is not included within the proposals, further assessment of the suitability of areas closer to the panels, and the amount of 'core habitat' available, is required. In relation to providing a 150m buffer between the mitigation areas and proposed solar PV modules, it was agreed in principle during a meeting with Natural

ID	Summary	Comment	Response
	a buffer (issue rated 'amber' [NE1a]).	mitigation and compensation measures will be secured in the DCO. Risk level: Amber.	England on 19 June 2025 that due to screening from existing hedgerows, a 150m buffer would not be required. Section 3.2 of the **Outline LEMP [EN010157/APP/7.5 Revision 3]** has been updated with additional evidence to show that the solar PV modules would not be visible to birds using the mitigation areas and therefore the amount of 'core habitat' available would not be affected. The updated **Outline LEMP [EN010157/APP/7.5 Revision 3]** taking account of the above changes is submitted alongside this document at Deadline 1. A summary of the suitability of each of the mitigation areas is provided below: Mitigation Area 9: This area is 20.86ha in size. It was chosen due its large size which will provide wide open vistas suitable for wintering birds. Its location on the edge of the Order Limits will also minimise proximity to the proposed solar PV modules. As shown on the **ES Volume 3, Figure 3.4: Indicative Environmental Masterplan [APP-058]**, the proposed solar PV modules are separated from the mitigation area by two existing tall hedgerows with trees and would not be visible to birds using the mitigation area. The amount of functionally available 'core habitat' would therefore not be affected by the solar PV modules. The mitigation area is also surrounded by existing farmland

ID	Summary	Comment	Response
			fields, farms, and stables and is considered a suitable location, similar to habitats used by golden plover, lapwing, mallard, teal and black-headed gull in the surrounding area. Mitigation Area 11 (Field E6): This area is 8.6ha in size. It is a large field which will provide wide open vistas suitable for wintering birds. Its location on the edge of the Order Limits will also minimise proximity to the proposed solar PV modules. As shown on the **ES Volume 3, Figure 3.4: Indicative Environmental Masterplan [APP-058],** the mitigation area is separated from the proposed solar array to the north by an existing hedgerow, which would be gapped up to ensure that the solar PV modules would not be visible to birds using it. Therefore, the amount of functionally available 'core habitat' within the mitigation area would not be affected by the solar PV modules. The mitigation area is also surrounded by a Scheduled Monument site (Meaux Duck Decoy) and other ecological mitigation areas for ground nesting birds where no solar PV modules would be located. It is adjacent to Holderness Drain, one of the widest waterbodies within or directly adjacent to the Order Limits. As such, Mitigation Area 11 (Field E6) is considered a suitable location, similar to habitats used by golden plover, lapwing, mallard, teal and black-headed gull in the surrounding area.

ID	Summary	Comment	Response
			Mitigation Area 13 (Fields E13/E14): This area is 8.68ha in size. It is a large area comprising Fields E13 and 14, which will provide wide open vistas suitable for wintering birds. It is also located along the edge of the Order Limits. As shown on the **ES Volume 3, Figure 3.4: Indicative Environmental Masterplan [APP-058]**, the mitigation area is separated from the proposed solar PV modules by an existing road, bounded on both sides by tall hedgerows and a line of established trees. As such the solar PV modules would not be visible to birds using the mitigation area and the amount of 'core habitat' available would not be affected. The mitigation area is surrounded by existing arable fields to the west, north, and east, and by an existing farm to the southwest. As such it is considered a suitable location, similar to habitats used by golden plover, lapwing, mallard, teal and black-headed gull in the surrounding area. In addition, while the Applicant cannot control future development of land outside the Order Limits, as the mitigation areas would be functionally linked land for Humber Estuary SPA/Ramsar site species, the onus would be on future developers to take into consideration the location of the mitigation areas and any required buffers/mitigation measures in their ecological assessments. Natural England as the statutory nature conservation body would be consulted on such future applications. The Applicant has

ID	Summary	Comment	Response
			undertaken a cumulative effects assessment presented in **ES Volume 2, Chapter 15: Cumulative Effects [APP-051]** and also undertaken an in-combination effects assessment as part of the **Habitats Regulations Assessment - Information to inform Appropriate Assessment [EN010157/APP/5.3 Revision 2]**. These assessments have included the known other existing and/or approved developments within 10km of the Proposed Development, as of 28 October 2024. Of the developments identified in the **ES Volume 2, Chapter 15: Cumulative Effects [APP-051]**, only Carr Farm Solar Farm (22/03648/STPLF) is located within 150m of a mitigation area (being Mitigation Area 11 – Field E6). This application for a 49.9MW Solar Farm was refused in December 2024 and is currently the subject of an appeal. The infrastructure layout plan for Carr Farm Solar Farm (submitted as part of their planning application) shows that they are proposing solar PV modules in the field adjacent to the western boundary of Mitigation Area 11. Based on the infrastructure layout plan, the closest solar PV modules would be located approximately 25m from Mitigation Area 11. The mitigation area would be separated from the solar PV modules by Holderness Drain, which is bounded on both sides by hedgerows. As such the solar PV modules would not be visible to birds using the mitigation area. In addition, the proposed mitigation for Carr Farm Solar Farm includes not undertaking

ID	Summary	Comment	Response
			construction works during winter, thereby avoiding noise related disturbance of wintering birds within Mitigation Area 11. Therefore, the amount of 'core habitat' available would not be affected. Furthermore, from a review of the East Riding Local Plan Update (Adopted April 2025) interactive map (Accessed: 19/06/2025) there are no land allocations for development within a 150m buffer of the Order Limits. The Applicant notes that Natural England are in agreement with clarification provided by email regarding the size of the Mitigation Areas. The size of the mitigation areas has been updated within all relevant documents, including the **Outline LEMP [EN010157/APP/7.5 Revision 3]**, and these updated versions are submitted alongside this document at Deadline 1.
RR-012	**Internationally designated sites** Natural England stated that there is an 'amber' concern regarding the potential loss of functionally linked land for qualifying bird species of the	Natural England stated that there is an 'amber' concern for the Humber Estuary SPA and Ramsar sites over potential loss of functionally linked land for qualifying bird species during construction and operation, due to proposed permissive footpaths within mitigation areas 9 and 11. They advise assessing the impact of human disturbance on habitat suitability, noting that golden plover typically require a 200–500 m buffer from pedestrians. Clarification is needed on whether fencing will separate footpaths from	The Applicant acknowledges Natural England's concerns regarding the permissive paths within the mitigation areas. The Applicant is giving consideration to ways of addressing this issue, such as re-routing paths, use of signage in appropriate locations instructing dog walkers to keep their dogs on a lead and/or additional fencing. The **Outline LEMP [EN010157/APP/7.5 Revision 3]** and **ES Volume 3, Figure 3.4: Indicative Environmental Masterplan [APP-058]** will be updated to reflect any changes as necessary and submitted at subsequent deadlines.

ID	Summary	Comment	Response
	Humber Estuary SPA and Ramsar sites, due to the inclusion of permissive footpaths within the proposed mitigation areas during both construction and operation (issue [NE1b]).	mitigation areas, as dogs could make areas unsuitable for target species. Further information is also required on how mitigation and compensation measures will be secured in the DCO.	.
RR-012	**Internationally designated sites** Natural England stated that there is an 'amber' concern regarding the potential loss of functionally linked land for qualifying bird species of the Humber Estuary SPA and Ramsar sites, due to issues relating to the hydrology of	Natural England stated that there is an 'amber' concern for the Humber Estuary SPA and Ramsar sites over potential loss of functionally linked land for qualifying bird species during construction and operation, due to uncertainties about the hydrology of proposed mitigation areas. While welcoming the creation of scrapes, they advise assessing existing drainage to ensure fields can hold sufficient water, with options such as blocking drains or raising ditch water considered. As no hydrological studies have yet been done, a precautionary approach is needed, and the HRA should assess alternative mitigation if scrapes prove unviable, including whether larger areas would be required. Further information is	Section 3.2 of the **Outline LEMP [EN010157/APP/7.5 Revision 3]** has been updated with further information regarding the viability of the proposed scrapes within the mitigation areas, including additional hydrological information regarding the current hydrological statuses of the fields available at this stage of the Proposed Development. An initial review of hydrological and soil information indicates that Mitigation Areas 11 and 13 are suitable locations to create scrapes successfully, with the exact locations of the scrapes to be determined by pre-construction hydrological studies. Mitigation Area 9 would not be suitable for scrape creation, and would be sown with a flower rich neutral grassland, which would be managed as permanent pasture.

ID	Summary	Comment	Response
	the proposed mitigation areas during both construction and operation (issue [NE1c]).	also needed on securing mitigation and compensation in the DCO.	The **Habitats Regulations Assessment - Information to inform Appropriate Assessment [EN010157/APP/5.3 Revision 2]** includes cross references to the **Outline LEMP [EN010157/APP/7.5].** The proposed mitigation would be secured through the **Outline LEMP [EN010157/APP/7.5 Revision 3]** which is secured by Requirement 9 of the Draft DCO. The updated **Outline LEMP [EN010157/APP/7.5 Revision 3]** is submitted alongside this document at Deadline 1.
RR-012	**Internationally designated sites** Natural England stated that there is an 'amber' concern regarding the potential loss of functionally linked land for qualifying bird species of the Humber Estuary SPA and Ramsar sites, due to issues relating to the management	Natural England stated that there is an 'amber' concern for the Humber Estuary SPA and Ramsar sites over potential loss of functionally linked land for qualifying bird species during construction and operation, due to uncertainties about the management of proposed mitigation areas. They cannot give full advice until the Outline Landscape and Ecological Management Plan includes clear objectives, measurable targets, management and monitoring details (with responsibilities and timings), limits of acceptable change, and remedial actions. They recommend specific habitat management practices, such as cutting and grazing regimes, scrape creation and maintenance, and ensuring wintering bird	Section 19.3 of the **Outline LEMP [EN010157/APP/7.5 Revision 3]** has been updated to include an indicative management and monitoring programme, and targets for success criteria and potential remedial actions. The Landscape and Ecological Management Plan will include detailed management and monitoring, including: • clear objectives; • target for each objective (including SPA bird use targets and habitat targets); • details of required management and monitoring (including who is responsible and when it will take place);

ID	Summary	Comment	Response
	of the proposed mitigation areas during both construction and operation (issue [NE1d]).	habitat is established before construction. Further information is also needed on how mitigation and compensation will be secured in the DCO.	• details of limits of acceptable change; and • details of remedial actions, where appropriate. This will be developed in consultation with Natural England. Sections 15 and 19 of the **Outline LEMP [EN010157/APP/7.5 Revision 3]** have been updated to include the suggested management measures for Humber Estuary designated sites Mitigation Areas. Section 3.1 of the **Outline LEMP [EN010157/APP/7.5 Revision 3]** has been updated to include reference to the commitment to ensuring the wintering bird habitat within the Humber Estuary designated sites Mitigation Areas will be created sufficiently in advance of infrastructure work to ensure appropriate habitat is available prior to the beginning of construction activity. The updated **Outline LEMP [EN010157/APP/7.5 Revision 3]** is submitted alongside this document at Deadline 1.
RR-012	**Internationally designated sites** Potential loss of functionally linked land for the relevant qualifying	Natural England welcomed the ongoing passage and wintering bird surveys on the grid connection cable route, noting they were necessary to assess impacts. In the absence of targeted data, a precautionary approach had been taken, treating the land as functionally linked in the **sHRA [APP-145].**	The results of the non-breeding bird surveys for the grid connection cable route have been added to the **Habitats Regulations Assessment - Information to inform Appropriate Assessment [EN010157/APP/5.3 Revision 2]**. A similar suite of species to those recorded within Land Areas B to F were also recorded within the grid connection cable

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	birds features of the listed SPA/Ramsar sites – Bird surveys (construction and operation) ('amber') [NE1e].	They also welcomed the submission of the Wintering Bird Survey Report [APP-108], Ornithological Survey Report [APP-109], and Passage Bird Survey Report [APP-113], and considered the survey effort sufficient to inform the assessment of impacts from loss of functionally linked land. Results from the non-breeding bird surveys were included in the Habitats Regulations Assessment [EN010157/APP/5.3APP-145]. Similar species were recorded along the cable route, so the precautionary approach meant the additional data did not change the assessment conclusions. The updated assessment was submitted at Deadline 1. Natural England stated that further information was required on securing mitigation or compensation measures in the DCO. The risk rating was amber.	route. As such, as a precautionary approach had already been taken in the assessment, the additional data does not change the conclusions of the **Habitats Regulations Assessment - Information to inform Appropriate Assessment [EN010157/APP/5.3 Revision 2]**. The updated **Habitats Regulations Assessment - Information to inform Appropriate Assessment [EN010157/APP/5.3 Revision 2]** is submitted alongside this document at Deadline 1.
RR-012	**Internationally designated sites** Natural England stated that there is a 'yellow' concern regarding the	Natural England stated that there is a 'yellow' concern for the Humber Estuary SPA and Ramsar sites regarding the 'bird days' calculation method used to determine mitigation area requirements for wintering birds. They welcome the separate consideration of lapwing and golden plover	The Biodiversity Mitigation Strategy has been incorporated into the **Outline LEMP [EN010157/APP/7.5 Revision 3].** The bird days calculation has been updated to include the grid connection cable route bird survey data. Full details of the calculation (including the methodology

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	potential loss of functionally linked land for qualifying bird species of the Humber Estuary SPA and Ramsar sites, relating to the 'bird days' calculation methodology during both construction and operation (issue [NE1f]).	needs but note that the number of 'bird days' in the calculation has been reduced from 202 to 151 compared to an earlier draft. They advise that the lower figure should be justified in the project documentation.	and data used) have been provided in Appendix E of the updated **Outline LEMP [EN010157/APP/7.5 Revision 3].** In re-calculating the bird days, errors including those identified by Natural England have been corrected. Although the re-calculation has reduced the area of mitigation required, the Applicant has remained committed to providing the original mitigation areas (Mitigation Areas 9, 11 and 13). The updated **Outline LEMP [EN010157/APP/7.5 Revision 3]** is submitted alongside this document at Deadline 1.
RR-012	**Internationally designated sites** Natural England stated that there is an 'amber' concern regarding potential noise and visual disturbance impacts during construction on functionally linked land for qualifying bird species of the	Natural England stated that there is an 'amber' concern for the Humber Estuary SPA and Ramsar sites over potential noise and visual disturbance to functionally linked land during construction. While the sHRA concludes mitigation is needed, Natural England advises further assessment of how predicted noise levels (101.9–124.3 dB at source) will affect sensitive bird locations, considering changes to the existing noise environment, type of noise, and duration. They note that noise above 70dB LAmax is likely to be disturbing and recommend exploring mitigation such as timing restrictions, buffer zones, or acoustic	Within Fields E4, E5 and E15, E17 and D17 (adjacent to the Humber Estuary designated sites Mitigation Areas), the Applicant will avoid completing the activities most likely to disturb birds (e.g. loud activities such as piling, installing access tracks, laying cables, etc.) during winter (October to March). Only activities less likely to disturb birds (e.g. commissioning works including panel installation) would potentially take place in these fields during winter, if necessary. Noise modelling is therefore not proposed. This approach was agreed in principle during a meeting with Natural England on 19th June 2025. Should this not be possible, acoustic fencing would be installed for the construction period to provide a noise

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	Humber Estuary SPA and Ramsar sites (issue [NE2a]).	screening, with effectiveness assessed. They welcome commitments to avoid night-time working and minimise lighting, but stress these should be secured in the CEMP. Further information is required on securing mitigation in the DCO.	and visual barrier, as well as hedgerow screening already in place. The **Habitats Regulations Assessment - Information to Inform Appropriate Assessment [EN010157/APP/5.3 Revision 2]** and the **Outline CEMP [EN010157/APP/7.2 Revision 2]** have been updated accordingly to secure these commitments and are submitted alongside this document at Deadline 1. The **Outline CEMP [EN010157/APP/7.2 Revision 2]** has been updated to include the commitment outlined in the **Habitats Regulations Assessment - Information to Inform Appropriate Assessment [EN010157/APP/5.3 Revision 2]** that 'there will be no night-time working unless agreed with the Local Planning Authority, and any artificial lighting will be kept to a minimum and not directed towards habitat suitable for SPA/Ramsar site qualifying species'.
RR-012	**Internationally designated sites** Natural England stated that there is an 'amber' concern regarding potential noise and visual disturbance	Natural England stated that there is an 'amber' concern for the Humber Estuary SPA and Ramsar sites regarding potential noise and visual disturbance from overhead power lines during construction and operation. While noting confirmation that no above-ground cabling is required, they request clarification on whether powerlines and pylons shown in project plans are new or existing. If new infrastructure is proposed,	No new overhead power lines (OHL's) will be constructed as part of the Proposed Development. All OHL's depicted on **ES Volume 3, Figure 3.5: Indicative Construction Layout Plan [APP-059]** are existing. As such, no assessments need updating.

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	impacts from overhead power lines during both construction and operation on functionally linked land for qualifying bird species of the Humber Estuary SPA and Ramsar sites (issue [NE2b]).	the HRA should assess SPA bird flightlines and potential collision risks. Further information is needed on securing mitigation and compensation in the DCO.	
RR-012	**Internationally designated sites** Natural England flagged an 'amber' concern regarding potential disturbance to lamprey species in internationally designated sites (Humber Estuary SPA/Ramsar) during both construction and	Natural England stated that there is an 'amber' concern for the Humber Estuary SAC and Ramsar sites regarding potential disturbance to lamprey during construction and operation. They advise that Horizontal Directional Drilling should occur April–September to avoid peak lamprey migration, with HDD pits positioned at least 50 m from main rivers. Cables should be buried 7–20 m below the riverbed with an insulating layer to prevent electromagnetic field impacts. With these measures, no adverse effects on lamprey are expected. Further information is needed on securing these mitigation measures in the CEMP and DCO, and post-consent monitoring of electromagnetic fields is recommended.	The preferred timings to undertake the Horizontal Directional Drilling (HDD) would be during spring/summer (April to September), when the ground conditions would be drier. This would avoid the peak lamprey migration period. While the Applicant cannot commit to this restriction at this stage, it will adhere to these timings where possible. In the unlikely event that it is not possible to avoid the lamprey migration period, as detailed in Section 7.5 of the **Habitats Regulations Assessment - Information to inform Appropriate Assessment [EN010157/APP/5.3 Revision 2],** no adverse effects are anticipated given that the HDD under the River Hull would be at a minimum depth of 7m, very short-term (estimated to take a maximum of 24 hours), and that

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	operation. (issue [NE3])		fish without a swim bladder (which includes lamprey) have the lowest sensitivity to noise/vibration. During a meeting with Natural England on 19th June 2025, NE confirmed that they would align with the Environment Agency in relation to potential disturbance impacts to lamprey. The commitment to HDD at a minimum depth of 7m below the riverbed is stated in **Commitments Register [EN010157/APP/6.4 Revision 2]** however, the Applicant notes that this commitment is absent from the **Outline CEMP [EN010157/APP/7.2 Revision 2].** The **Outline CEMP [EN010157/APP/7.2 Revision 2]** has been updated to secure this mitigation measure within this document and is submitted alongside this document at Deadline 1. The Applicant acknowledges that Natural England find the proposed position of the HDD pits (positioned a minimum of 50m from main rivers) suitably precautionary and therefore no changes to this approach are proposed. The Applicant acknowledges the recommendation for post-consent monitoring of electromagnetic fields. If required, this will be detailed and secured within the operational environmental management plan, as set

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			out within the **Outline OEMP [EN010157/APP/7.3 Revision 2]**.
RR-012	**Internationally designated sites** Natural England raised an 'amber' concern for potential abstraction impacts resulting from Horizontal Directional Drilling (construction) ('amber') [NE4].	Natural England stated 'amber' concern related to the construction phase, focusing on potential impacts from water abstraction associated with Horizontal Directional Drilling (HDD). They noted that the sHRA acknowledged that water supply impacts could occur due to abstraction but did not provide details on the source of water required for HDD. Natural England advised that the source of this water should be clarified. They stated that if water was drawn from a local watercourse, an assessment of potential impacts on the Humber Estuary designated sites would need to be undertaken within the HRA. Additionally, Natural England highlighted that further information was needed regarding the mechanism for securing mitigation or compensation measures in the Development Consent Order (DCO). The issue was assigned an Amber risk rating.	The **Habitats Regulations Assessment - Information to inform the Appropriate Assessment [EN010157/APP/5.3 Revision 2]** has been updated to confirm that the water for HDD will be brought to site. No water will be abstracted from the River Hull or a tributary of the Humber Estuary for the HDD and mention of abstraction has been removed. Wastewater from the HDD wastewater (including bentonite) will be incarcerated within the launch pit and transported to a specialised local facility for disposal. The **Outline CEMP [EN010157/APP/7.2 Revision 2]** has been updated to include this commitment. The updated **Habitats Regulations Assessment - Information to inform Appropriate Assessment [EN010157/APP/5.3 Revision 2]** and the **Outline CEMP [EN010157/APP/7.2 Revision 2]** has been submitted alongside this document at Deadline 1.
RR-012	**Internationally designated sites**	Natural England's raised 'amber' concerns regarding potential water quality impacts during the construction phase at the Humber Estuary SAC and Ramsar sites, specifically	As described in the **Outline CEMP [EN010157/APP/7.2 Revision 2]**, the Construction Environmental Management Plan will include details regarding HDD breakout, including site-specific

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	Natural England raised an 'amber' concern about potential water quality impacts from bentonite breakout during Horizontal Directional Drilling in the construction phase (issue [NE5]).	from bentonite breakout during Horizontal Directional Drilling (HDD). They noted that the outline Construction Environmental Management Plan (oCEMP) includes a general bentonite breakout management plan with generic countermeasures but lacks site-specific details. Natural England stated they could not provide comprehensive advice until these details are provided and advised that the oCEMP should include sufficient site-specific mitigation measures to inform the HRA. Further information is also required on how mitigation or compensation measures would be secured in the Development Consent Order (DCO).	methodologies, where necessary. Details of these activities cannot be finalised until a Principal Contractor is appointed and specific methodologies are agreed upon. The **Habitats Regulations Assessment - Information to inform Appropriate Assessment [EN010157/APP/5.3 Revision 2]** has been updated to refer to the need to include site-specific methodology in the Construction Environmental Management Plan, once the Principal Contractor has been appointed, and is submitted alongside this document at Deadline 1.
RR-012	**Internationally designated sites** Natural England raised an 'amber' concern about potential water quality impacts during operation	Natural England raised 'amber' concern relating to potential water quality impacts during the operation phase at the Humber Estuary SAC and Ramsar sites from cleaning solar PV modules. They noted that the Outline Operational Environmental Management Plan (oOEMP) currently proposes no measures for water	The **Habitats Regulations Assessment - Information to inform Appropriate Assessment [EN010157/APP/5.3 Revision 2]** has been updated to confirm that the solar PV modules will be cleaned using deionised water only and therefore there would be no impacts on water quality as a result of cleaning the solar PV modules.

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	from cleaning solar PV modules (issue [NE6a]).	impacts. Natural England advised that clarification is needed on the substances used for panel cleaning and that any potential impacts on water quality should be assessed in the HRA. They recommended using a methodology that avoids water quality impacts and securing the agreed approach through the OEMP. Further information is also required on how mitigation or compensation measures would be secured in the DCO.	The **Outline OEMP [EN010157/APP/7.3 Revision 2]** has also been updated to clarify details of solar PV module cleaning. The updated **Habitats Regulations Assessment - Information to inform Appropriate Assessment [EN010157/APP/5.3 Revision 2]** and the **Outline OEMP [EN010157/APP/7.3 Revision 2]** have been submitted alongside this document at Deadline 1.
RR-012	**Internationally designated sites** Natural England raised an 'amber' concern about potential water quality impacts during operation from fire suppression measures or protocols (issue [NE6b]).	Natural England's raised 'amber' concern relating to potential water quality impacts during the operation phase at the Humber Estuary SAC and Ramsar sites from fire suppression measures for the Battery Energy Storage System (BESS). They noted that the oOEMP states an automatic clean agent system will be used instead of a water-based system. Natural England advised that details of the clean agent, the firefighting protocol, and the methodology for extinguishing fires should be provided, and any potential water quality impacts assessed in the HRA. They recommended using methods that avoid water contamination and, where non-water-	The **Habitats Regulations Assessment - Information to Inform the Appropriate Assessment [EN010157/APP/5.3]** has been updated to include details of the fire suppression system for the BESS and includes an assessment of potential likely significant effects from the fire suppression system. This updated version has been submitted alongside this document at Deadline 1. The **Outline BSMP [EN010157/APP/7.6 Revision 2]** identifies the key standards, guidelines, and principles the Applicant will adhere to during the detailed design and operation of the BESS. An automatic clean agent (aerosol or gas system) fire suppression system will be used in the event of a battery fire. The use of a non-water-based system reduces the need for large volumes of on-site water

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		based solutions are necessary, specifying measures to prevent contamination of watercourses. Further information is required on how mitigation or compensation measures would be secured in the DCO.	and reduces the risk of contamination of adjacent habitats from firewater. Water would only be used to cool areas adjacent to a BESS to prevent fire spread, rather than being used to attempt to directly fight a fire within the BESS. In line with the above, the **Outline BSMP [EN010157/APP/7.6 Revision 2]** has been updated and submitted at this deadline to reflect both aerosol or gas system.
RR-012	**Nationally designated sites** Natural England's position on nationally designated sites is that 'yellow' issues are unlikely to damage or destroy the designated features, provided appropriate mitigation is secured. This includes potential	Natural England's raised 'yellow' concern regarding potential impacts on the Humber Estuary SSSI during both construction and operation. They noted that the SSSI had not been assessed as a separate feature and advised it should be included in the assessment of likely effects. Their advice on SSSI impacts aligns with issues NE1–NE6b relating to the Humber Estuary SPA, SAC, and Ramsar sites. Further information is required on how mitigation or compensation measures would be secured in the DCO.	The Humber Estuary Site of Special Scientific Interest (SSSI) has been considered in the **ES Volume 2, Chapter 7: Biodiversity [EN010157/APP/6.2 Revision 2]** as a separate ecological feature in its own right. Given that the site underpins the Humber Estuary SPA and SAC, and coincides with the boundary of the Humber Estuary Ramsar site, the majority of the reasons for the SSSI designation are also included as qualifying features of the Humber European sites, and have been considered in the **Habitats Regulations Assessment - Information to inform Appropriate Assessment [EN010157/APP/5.3 Revision 2].** As such, the assessment in the ES includes cross-references to the **Habitats Regulations Assessment - Information to inform Appropriate Assessment [EN010157/APP/5.3 Revision 2]** where appropriate, rather than repeating its content in full. Those features not included on the citations for the European sites

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	impacts on the Humber Estuary SSSI during construction and operation (issue [NE7]), with further details set out in Part II.		have been considered separately in the **ES Volume 2, Chapter 7: Biodiversity [EN010157/APP/6.2 Revision 2]**. Given the distance from the Proposed Development and embedded mitigation in relation to water quality, no impacts on the features not included on the citations for the European sites would be anticipated. This approach to considering the Humber Estuary SSSI was agreed in principle during a consultation meeting with Natural England on 19th June 2025.
RR-012	**Protected species** Natural England raised an Amber concern regarding potential impacts on protected species, specifically water vole and otter (issue [NE8a]).	Natural England raised 'amber' concern regarding potential impacts on water vole and otter during construction and operation. They noted that habitat suitability surveys have been carried out, but advised clarification on whether pre-construction surveys will cover all watercourses suitable for both species. Guidance from the Water Vole Mitigation Handbook and NatureScot for otters should be followed, and any deviations from these guidelines must be clearly justified. Further information is required on how mitigation or compensation measures would be secured in the DCO.	**ES Volume 2, Chapter 7: Biodiversity [EN010157/APP/6.2 Revision 2]** and the **Outline CEMP [EN010157/APP/7.2 Revision 2]** have been updated to ensure pre-construction water vole and otter surveys use appropriate guidance. This includes where land access permits, undertaking water vole surveys 100m downstream and upstream from proposed culverts and watercourse crossing points which affect watercourses assessed as 'suitable but poor to optimal suitability' within **ES Volume 4, Appendix 7.7: Water Vole and Otter Habitat Suitability Report [APP-111]. ES Volume 2, Chapter 7: Biodiversity [EN010157/APP/6.2 Revision 2]** and **Outline CEMP [EN010157/APP/7.2 Revision 2]** has been updated to include, where land access permits, pre-construction otter surveys of suitable habitat within 200m of the proposed works and are submitted alongside this document at Deadline 1.

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RR-012	**Protected species** Natural England raised an 'amber' concern regarding potential impacts on badgers (issue [NE8b]).	Natural England raised 'amber' concern regarding potential impacts on badgers during construction and operation. They noted that construction should avoid main badger setts by 30 m, with stricter limits for heavy machinery, horizontal drilling, and large vehicles. Clarification is needed on the use of mammal gates and the criteria for their installation. All mitigation measures should be secured in the CEMP. Further information is required on how mitigation or compensation measures would be secured in the DCO.	As detailed and secured within the **Outline CEMP [EN010157/APP/7.2 Revision 2]** appropriate badger mitigation will be determined by the results of the pre-construction badger surveys. **Outline CEMP [EN010157/APP/7.2 Revision 2]** has been updated to secure appropriate badger mitigation within the Construction Environmental Management Plan. This will include ensuring that where reasonably practicable, construction work will not take place within 30m from an active badger sett identified during the pre-construction surveys without appropriate mitigation. Mitigation may involve the exclusion of setts under a Natural England licence if assessed as necessary, but this will be determined on the results of the pre-construction badger survey. The pre-construction badger survey will determine if badger gates are required and the Construction Environmental Management Plan will provide specific information, such as gate position, number of gates and gate specification. The updated **Outline CEMP [EN010157/APP/7.2 Revision 2]** has been submitted alongside this document at Deadline 1.
RR-012	**Protected species**	Natural England raised 'grey' concern in relation to bats during construction and operation.	Detailed measures to mitigate the effect on bats will be included within the Construction Environmental Management Plan and Operational Environmental

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	Natural England raised a Grey issue for bats (issue [NE8c]).	They welcomed the mitigation measures in the oCEMP and oOEMP and advised that double-row Heras fencing with brash or netting should be used when removing hedgerows, preferring brash. If netting is used, it should cover both sides and the top of the fencing. Further information is required on how mitigation or compensation measures would be secured in the DCO.	Management Plan. This will include ensuring that, where reasonably practicable, the fencing options recommended by Natural England will be used.
RR-012	**Protected species** Natural England raised an 'amber' concern regarding potential impacts on breeding birds (issue [NE8d]).	Natural England raised 'amber' concern regarding breeding birds during construction and operation. They noted that the oLEMP refers to taking action if bird numbers fall "well short" of baseline, but advised that this terminology is ambiguous. Clear targets and thresholds for triggering remedial habitat management should be defined. Further information is required on how mitigation or compensation measures would be secured in the DCO.	The term 'well short' has been removed from the **Outline LEMP [EN010157/APP/7.5 Revision 3]** and as per NE comment NE1d, the **Outline LEMP [EN010157/APP/7.5 Revision 3]** has been updated to include clear objectives, defined targets, details of limits of acceptable change and details of remedial actions, where appropriate and is submitted alongside this document at Deadline 1.
RR-012	**Biodiversity net gain**	Natural England raised 'grey' issue relating to biodiversity net gain (BNG) for the project.	The headline figures for Biodiversity Net Gain (BNG) are 62.36% for area habitats, 46.48% for hedgerow habitats and 12.50% of watercourse habitats. These

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	Natural England's key issue NE9 concerns biodiversity net gain (BNG). Although BNG is not yet mandatory for NSIPs, Natural England stated it strongly recommended that its provision be secured for this development.	Natural England welcomed the commitment to achieving at least 10% BNG across all biodiversity unit types, secured via the LEMP. They noted a precautionary approach for certain watercourses without River Condition Assessments, assuming 'good' baseline conditions. The assessment covers the entire DCO site, with all gains on-site and locally beneficial. Biodiversity gains will be monitored and managed for 40 years. No further mechanism for securing mitigation or compensation in the DCO is required.	figures are based on the Indicative Environmental Masterplan contained within Appendix D of the **Outline LEMP [EN010157/APP/7.5 Revision 3]**. Primarily, area habitat gains have been acquired through the habitat creation of *Other neutral grassland* in several forms. "Moderate" condition was assumed for perimeter edges of the fields containing solar PV modules (20% total of the Land Areas containing solar PV modules), with "Poor" assumed for all grassland beneath the solar PV modules (75%). A further 5% of all Land Areas containing Solar PV modules was inputted as *Developed land; sealed surface* which generates no Biodiversity Units (BUs), representing the area of the solar PV modules themselves. The mitigation grassland areas were inputted as *Other neutral grassland* in "Good" condition. Hedgerow impacts were estimated through minimum "punch-through" widths (representing the cable and access routes) of 8m. Where this was apparent, the impact exceeded 8m, this was entered accordingly as habitat loss (up to 40m for access). All re-created hedgerows were inputted as their species-rich versions (*Species-rich native hedgerow*) to represent the management prescriptions in the **Outline LEMP [EN010157/APP/7.5 Revision 3]** showing hedgerow enhancement following removal. Newly created hedgerows from the **Outline LEMP**

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			[EN010157/APP/7.5 Revision 3] were also inputted to achieve the net gain in this habitat type. Watercourse gains have been achieved through the reduction in riparian zone encroachment on the extensive ditch network. Where these ditches lay adjacent to arable habitats in the baseline, if they were to become *Other neutral grassland* the respective ditch's encroachment was reduced by one score (major to minor) representing a precautionary approach. It is likely that there will be no encroachment on the bank where arable has been converted to grassland as a result of the development. Precautionary approaches of assigning "Good" where survey data was not available has been applied to all watercourses (e.g., ditches and minor tributaries) is highly likely to underestimate the watercourse habitat net gain, as no surveyed watercourse within the Order Limits was found to be in "Good" condition. Good is therefore likely to overestimate the baseline significantly and thus produce significant gains for watercourses.
RR-012	**Soils and best and most versatile agricultural land**	Natural England notes that the development will temporarily change land use across approximately 891 ha, including around 222.2 ha of BMV land. They highlight inconsistencies in the assessment area (723.2 ha surveyed vs 891 ha total site) and	A detailed ALC and soil survey has not been undertaken of the grid connection cable route at this stage. However, the **Outline Soil Management Plan [EN010157/APP/7.8 Revision 2]** covers the full Order Limits, including the grid connection cable route. As set out in the **Outline Soil Management Plan**

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	Natural England reviewed the Agricultural Land Classification Report (Appendix 10.2) and provided comments. No major concerns were raised, and the issue is rated 'Grey' (issue [NE10]).	advise clarification. Only 1.3 ha of land will be permanently lost, none of which is BMV. Natural England emphasises that detailed Agricultural Land Classification (ALC) and soil surveys should be carried out across the full study area, including the grid connection cable route, to inform soil management plans and minimise risk of soil damage, degradation, or permanent loss. Soil should be handled according to best practice and reinstated to a high standard.	**[EN010157/APP/7.8 Revision 2]**, it is proposed that detailed soil/land quality surveys of the grid connection cable route will be undertaken post-consent/pre-construction, once the design and land needed for excavation is confirmed, thus avoiding unnecessarily surveying the entire width of the proposed grid connection cable route corridor. The **Outline Soil Management Plan [EN010157/APP/7.8 Revision 2]** describes the survey work that will be carried out prior to drafting the Soil Management Plan, and the consultation process that will be in-built prior to finalising the Soil Management Plan before works commence. This is aligned with the approach taken on the recently consented East Yorkshire Solar Farm (EN010143), where Natural England accepted the approach of undertaking soil and ALC surveys of the cable corridor "once the final route has been determined"[1].
RR-012	**Soils and best and most versatile agricultural land** Natural England raised comments	Natural England advised that soils should only be handled when dry and friable, ideally between April and September, to reduce damage and the need for reconditioning. Soil handling should follow the Defra Construction Code of Practice and guidance	The **Outline Soil Management Plan [EN010157/APP/7.8 Revision 2]** has been updated to state April through October as the drier summer period to which soil handling will, so far as possible, principally be confined (it previously incorrectly stated November through April). Soil handling cannot be restricted to only April to September due to program constraints;

[1] https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010143/EN010143-000692-Natural%20England.pdf

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	on Outline Soil Management Plan ('grey') [NE11].	such as the Institute of Quarrying's Good Practice Guide for assessing soil moisture. Tractor-operated equipment may be used to address localised soil damage, but careful planning and adherence to best practice will minimise impacts. All soil operations should be supervised by a trained person, ideally a competent soil specialist. Long-term soil storage bunds should be grassed and maintained, with weed control applied as needed. Soils in the grid connection corridor should also be managed carefully and restored to their original Agricultural Land Classification (ALC) grade after works. No mechanism for securing mitigation in the DCO is required. The risk rating is grey.	however, as stated in the **Outline Soil Management Plan [EN010157/APP/7.8 Revision 2]**, should site work during the winter period be unavoidable, the more resilient SHU A soils will be prioritised for working on during this period. Additionally, site inspections of the soil condition prior to vehicle movements across the Site will be required, particularly during wet weather conditions. Text has been added to the **Outline Soil Management Plan [EN010157/APP/7.8 Revision 2]** to set out that if sustained heavy rainfall (e.g. >10mm in 24 hours) occurs during soil handling operations, work must be suspended and not restarted until the ground has had at least a full dry day or agreed moisture criteria (such as 'drier than the plastic limit') can be met. Lighter soil (SHU A) can generally be moved at a higher moisture content without damage than a heavy soil. Soil handling will be supervised by suitably trained personnel; however, it is impractical for a soil scientist to be on site to supervise all soil handling. The Defra Construction Code for Sustainable Use of Soils on Construction Sites (2009) does not mention the requirement for a competent soil specialist to supervise all soil handling but does state that "A Soil Resource Plan should not be so complicated that it is unworkable in practice". Additionally, the only specific requirement for soil scientist involvement is to

ID	Summary	Comment	Response
			complete a pre-construction soil survey which has been completed within the Land Areas and will be completed within the cable route areas pre-construction. The Applicant will consult with Natural England over the survey results to ensure that standards have been adhered to. The remaining Natural England comments on the **Outline Soil Management Plan [EN010157/APP/7.8 Revision 2]** are welcomed. A commitment has been added into the **Outline Soil Management Plan [EN010157/APP/7.8 Revision 2]** setting out that 'All storage bunds intended to remain in situ for more than 6 months, or over the winter period, should be grassed over, with weed control and other necessary maintenance carried out'. The updated **Outline Soil Management Plan [EN010157/APP/7.8 Revision 2]** has been submitted alongside this document at Deadline 1.
RR-012	**Ancient woodland and ancient/veteran trees** Natural England stated it is not providing bespoke	Natural England noted that there were three veteran or ancient trees within the order limits. Standing advice for ancient woodland was to be followed, as Natural England did not provide bespoke advice on the ancient woodland information in the Environmental Statement for this project. The need for mitigation or compensation was not assessed. The risk rating was grey.	As secured by the **Outline CEMP [EN010157/APP/7.2 Revision 2]**, a 15m buffer will be used for veteran trees identified within or adjacent to the Order Limits, where possible. However, in locations where access routes are proposed, where it is not possible to retain a 15m offset from any works, tree protection fencing will be installed prior to works commencing and, where relevant, works will be undertaken under arboricultural supervision and 'no dig' construction methods will

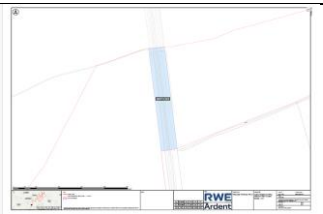
ID	Summary	Comment	Response
	advice on the ancient woodland and ancient/veteran trees information provided in the Environmental Statement (ES) for the Proposed Development. They referred to Part II for a summary of the standing advice ('grey'). Ancient woodland and ancient/veteran trees – General ('grey') [NE12].		be used to protect the soil from compaction and minimise root impacts. Further details will be provided in the Arboricultural Method Statement, which will be produced prior to construction of the Proposed Development commencing.
RR-012	**PART III: Natural England's comments on the draft Development Consent Order (DCO) and**	Comments on the draft Development Consent Order (DCO) and associated documents Page: 41-45 Topic/DCO Requirement: Requirements 1-19	Noted, please see responses above to each individual matter in Part II of Natural England's representation.

ID	Summary	Comment	Response
	associated documents	Natural England welcomed the inclusion of draft Requirements 4, 6, 9, 14, and 15 relevant to their remit and noted that detailed advice on the associated draft plans is provided in Part II of their Representations. They may provide further advice if additional information becomes available.	
RR-012	**PART III: Natural England's comments on the draft Development Consent Order (DCO) and associated documents**	Page: 43 Topic/DCO Requirement: Requirement 9 Landscape and Ecological Management Plan Natural England advised that consultation with Natural England should be referred to in part 1 of Requirement 9.	The Applicant agrees to add Natural England as a consultee in Requirement 9. This amendment has been made to the updated **Draft DCO [EN010157/APP/3.1 Revision 4]** submitted alongside this document at Deadline 1.
RR-012	**Appendix A: NatureScot protected species advice for developers – Otter** **PROTECTED SPECIES**	Appendix A: NatureScot protected species advice for developers – Otter PROTECTED SPECIES ADVICE FOR DEVELOPERS OTTER	Noted, please refer to response provided for issue reference NE8a.

ID	Summary	Comment	Response
	ADVICE FOR DEVELOPERS **OTTER**		
RR-012	**Natural England's overall conclusions**	Natural England concluded that several issues remain unresolved from the pre-application process and must be addressed by RWE Renewables UK Solar and Storage Limited and the Examining Authority during Examination before development consent can be granted. Some concerns are significant enough that, if not properly resolved, granting consent could be unlawful due to impacts on SAC, SPA, Ramsar, and SSSI sites.	The Applicant acknowledges the matters raised by Natural England in Section 2 and Part II of its advice. The Applicant is committed to working constructively with Natural England throughout the Examination to address and, where possible, resolve the issues identified. The Applicant recognises the need to ensure compliance with legal and policy requirements relating to designated sites, including SACs, SPAs, Ramsar sites, and SSSIs, and will continue to engage with Natural England and the Examining Authority to seek satisfactory resolution of outstanding concerns.

Table 2-13: Network Rail Infrastructure Limited Relevant Representation

ID	Theme	Comment	Response
RR-013		Network Rail stated that it is a statutory undertaker responsible for the majority of Great Britain's rail infrastructure, including the Yorkshire Coast Line, and provided a section 56 representation regarding RWE Renewables UK Solar and Storage Limited's application for a development consent order for the Peartree Hill Solar Farm and Battery Energy Storage System, which involves construction, operation, and maintenance of a solar PV array and associated infrastructure generating over 50 MW.	No response required
RR-013	Assets	Network Rail stated that the Applicant seeks powers in the draft Order to permanently acquire rights over land owned or occupied by Network Rail, including: 1) 3,035 m² of operational railway land north of Beverley South Western Bypass (Plot 16-3); 2) 87,343 m² of agricultural land, trees, hedgerows, public footpaths, and drainage near Hall Ings Farm and Beverley South Western Bypass (Plot 16-10); 3) 30,311 m² of agricultural land, trees, hedgerows, track, and public footpath north of Creyke Beck Substation (Plot 17-1); and 4) 4,694 m² of grassland, hedgerow, and track east of Creyke Beck Substation (Plot 17-6).	The Applicant is seeking new temporary rights (easement grant for 50 years) over Plot 16-3 from Network Rail and within this plot which is 143m long along the railway corridor where the RLB / limits of deviation and the proposed Option area of the Scheme is located. The easement is only to be 6m wide over the width of the railway corridor which is 21.29m when the final cable location has been fixed below the railway within the Plot 16-3 area. Network Rail have been engaging with the Applicant in relation to internal approvals and conditions in relation to the cable being located in Plot 16-3 and is engaging with Network Rail in relation to Heads of Terms for the 50 year easement grant in relation to this as well. Plot 16-3 is shown in the land interest easement plan as below:

			 Plots 16-10, 17-1 and 17-6 are all in third party freehold land ownership and Network Rail has either noted apparatus or adjoining land occupation interests within the Book of Reference and no direct land interest grants or rights are required from them in relation to these plots by the Applicant, only under plot 16-3 which Network Rail are aware of and have been in discussions with The Applicant for a number of months and in addition have progressed and concluded their internal approval process in respect to just this Plot 16-3.
RR-013	DCO	Network Rail stated that it wishes to ensure the Proposed Development does not negatively affect the operation or safety of the Railway during construction, operation, and maintenance. As the Applicant seeks to compulsorily acquire new rights over railway land and assets, Network Rail objects in principle to the Order, citing potential interference with the safe and efficient running of the Railway and serious detriment to its statutory duties. Network Rail will only consider withdrawing its objection if adequate protective provisions, as detailed in Appendix 1, are included in the Order,	The Applicant is in ongoing discussions with Network Rail regarding the protective provisions and will continue to engage with Network Rail to agree to the protective provisions for the benefit of Network Rail prior to the close of the Examination.

		along with an agreement to regulate the exercise of the new rights to prevent harm to the Railway.	
RR-013	Engagement	Network Rail is continuing to review the Promoter's plans, draft Order and application documents, and will continue to work constructively with the Promoter to clarify any issues raised.	No response required.
RR-013		Network Rail stated that it is continuing to review the Applicant's plans, draft Order, and application documents, and will work constructively with the Promoter to address any issues. Network Rail requests that the Examining Authority treats it as an Interested Party during the Examination and reserves the right to raise further concerns as more details about the Proposed Development and its impact on Network Rail's assets become available.	No response required.

Table 2-14: UK Health Security Agency Relevant Representation

ID	Theme	Comment	Response
RR-014		The UK Health Security Agency (UKHSA), responding on behalf of both UKHSA and the Office for Health Improvement and Disparities (OHID), welcomed the opportunity to comment on the Proposed Development at this stage.	No response required.
RR-014	Health	UKHSA, on behalf of both UKHSA and OHID, confirmed that their previous comments from 24 June 2024 have been addressed. They acknowledged that the Environmental Statement identified no significant public health issues and expressed satisfaction with the assessment methodology used.	The Applicant notes this comment.
RR-014	Health Land, Soil and Groundwater	UKHSA noted that potential impacts from historic ground contamination have been considered in the draft Development Consent Order. A scheme to assess and manage these impacts must be agreed with the local authority and the Environment Agency, as the relevant regulatory bodies.	The Applicant notes this comment.
RR-014	Health	UKHSA stated that, following their review, the Proposed Development is not expected to pose any significant risk to public health. Therefore, they have no further comments and will not register as an Interested Party with the Planning Inspectorate.	The Applicant notes this comment.
RR-014		UKHSA stated to contact them with any questions or concerns.	The Applicant notes this comment.

Table 2-15: Northern Powergrid (Yorkshire) LLP Relevant Representation

ID	Theme	Comment	Response
RR-015	General	Northern Powergrid stated that, as the electricity undertaker for the area, it is broadly supportive of the Proposed Development but has concerns regarding potential impacts on its existing assets and any necessary improvement works.	The Applicant notes these comments.
RR-015	DCO	Northern Powergrid stated that the Order's red line boundary includes its critical infrastructure, which is essential for maintaining power supply to local and wider customers. The Proposed Development interferes with Northern Powergrid's overhead lines and underground cables, vital to its operations. Northern Powergrid reserves the right to review the scheme as it progresses and seeks bespoke protective provisions in the Order to safeguard its apparatus, as specific details of the infrastructure are currently unknown.	The Applicant is in ongoing discussions with Northern Powergrid regarding the protective provisions and will continue to engage with Northern Powergrid to agree to the protective provisions for the benefit of Northern Powergrid prior to the close of the Examination.
RR-015	DCO	Northern Powergrid stated that the compulsory purchase powers in the DCO, if exercised, would adversely affect its ability to use, access, maintain, and upgrade its existing equipment, and that acquiring these interests is unnecessary where a mutual agreement between the parties would be more appropriate.	The Applicant notes these comments.
RR-015	DCO	Northern Powergrid stated that, beyond technical impacts, it has concerns that the draft Order's proposed protective provisions do not address site-specific issues or meet its standard requirements.	The Applicant notes these comments.

		Northern Powergrid stated it will discuss these concerns with the Applicant and requested close collaboration to minimise impacts on its apparatus and agree bespoke protective provisions within the draft Order.	
RR-015	Engagement	Northern Powergrid stated that it is keen to keep an open dialogue with the Applicant and to engage with the Applicant's legal representative to agree appropriate amendments to the protective provisions.	The Applicant notes these comments.

Table 2-16: Yorkshire Water Services Relevant Representation

ID	Theme	Comment	Response
RR-016	General	Yorkshire Water Services stated that it acknowledges the acceptance of the Proposed Development application for examination and confirms that the Proposed Development lies entirely within its operational area as the incumbent water and wastewater undertaker.	No response required.
RR-016	Water and Hydrology	Yorkshire Water Services stated that the Environmental Statement identifies several wastewater assets within the Proposed Development area, including combined sewers and water pipes, with a 36-inch treated water main near the proposed fence in land parcel E10. As statutory mapping is only indicative, on-site surveys are needed to determine exact locations and depths. Yorkshire Water Services advised the project team to prepare a crossing schedule to assess any required diversions or protections and invites engagement with their wastewater and water diversions teams if diversions are necessary.	The generation area of the Proposed Development has been designed to accommodate or avoid Yorkshire Water apparatus wherever possible. As shown the drawings in Appendix A of the **ES Volume 4, Appendix 5.6: Flood Risk Assessment [EN010157/APP/6.4 Revision 3]**, the panels and fencelines avoid the water pipes. The accuracy of the asset maps is noted and the site setting out will be subject to surveys and engagement with YWS. As shown in Appendix A, the proposed cable route crosses two know water pipes, along with other utilities. The detailed routing of the cable, and the method of crossing utilities is subject to surveys and detailed site assessments, at which time the applicant will engage with the asset owners to confirm the crossing dimensions, depths and method.
RR-016	Water and Hydrology	Yorkshire Water Services stated that the Flood Risk Assessment identifies a Sewage Treatment Works (STW) located about 80 metres south of parcel E14. As the owner of this wastewater site, Yorkshire Water	It understood this STW lies outside the Order Limits and consequently would not be impacts by the Proposed Development. This would be confirmed with YWS during site setting out.

ID	Theme	Comment	Response
		Services encourages the Applicant to confirm whether the scheme will affect YWS land.	
RR-016	Water and Hydrology	Yorkshire Water Services stated that part of the site lies within a Source Protection Zone, where dewatering and construction activities could affect groundwater quality and sensitive receptors. They advise that construction methods should include a groundwater risk assessment to identify where further hydrogeological assessments and mitigation are needed. Yorkshire Water Services looks forward to further engagement to ensure the Source Protection Zone is safeguarded.	It should be noted that the Applicant has committed to undertaking intrusive site investigation work prior to construction commencing, which will include the provision of current site-specific information on the existing groundwater conditions in locations across the Order Limits that will be determined when the scope of the intrusive site investigation is agreed with the local authorities, including at the Horizontal Directional Drilling (HDD) crossings. There will also be information to provide details of whether there are any existing potential contamination sources. This set of data from the intrusive works will be reviewed to present a refined conceptual site model for the Proposed Development. This will allow any outstanding potential risks to be identified, and at this point it can be determined whether there are any locations within the Order Limits (such as locations where construction activities such as HDD will be undertaken) that would require further assessment in terms of risks to groundwater. The need for specific Hydrogeological Risk Assessments would then be determined, with consultation and agreement from East Riding of Yorkshire Council, the Environment Agency and Yorkshire Water Services. Yorkshire Water Services will be included as a consultee on documents such as Hydrogeological

ID	Theme	Comment	Response
			Risk Assessments, or any potential documents relating to proposed mitigation or remediation in respect of protection of groundwater resources (if these are agreed to be required as works progress). This commitment is secured through **Commitments Register [EN010157/APP/6.4 Revision 2]** and the **Outline CEMP [EN010157/APP/7.2 Revision 2].**
RR-016	Water and Hydrology	Yorkshire Water Services stated that, based on a thorough crossing schedule of their assets and the results of groundwater and hydrogeological risk assessments, the Construction Environmental Management Plan (CEMP) must include mitigation measures to safeguard these assets. They request that further consultation on mitigation and safeguarding be directed to their planning consultation email.	Following the completion of intrusive site investigations prior to construction commencing, any relevant details regarding the findings of these investigations will be used to inform any requirement for a Hydrogeological Risk Assessment including any potential groundwater mitigation measures, if required. This will be secured through the Construction Environmental Management Plan.
RR-016	Water and Hydrology	Yorkshire Water Services stated that, due to some unknown aspects of the development and the likely interaction with their assets, ongoing engagement with YWS is essential.	Noted and the Applicant welcomes engagement with YWS to ensure interaction with their equipment is avoided, minimised or managed.
RR-016		Yorkshire Water Services stated that they are available for contact should any clarification be needed on the points raised.	No response required.

Table 2-17: Mining Remediation Authority Relevant Representation

ID	Theme	Summary	Response
RR-022	Land Use	The Mining Remediation Authority confirmed that the Proposed Development site lies outside the defined coalfield, and therefore, the Coal Authority has no comments to make.	The Applicant notes this comment.

2.4 Non-statutory organisations

2.4.1 The table below set out the responses to the Relevant Representations from non-statutory organisations and the response from the Applicant.

Table 2-18: Yorkshire Wildlife Trust Relevant Representation

ID	Theme	Comment	Response
RR-017		Yorkshire Wildlife Trust stated that, due to the volume of documentation, they have focused on the most relevant biodiversity documents and may provide further comments during the examination. They also noted they have not received any confidential protected species information and are therefore unable to comment on that aspect.	No response required.
RR-017	Ecology and Wildlife	Yorkshire Wildlife Trust stated that it may wish to comment on the proposals, especially regarding their proximity to statutory and non-statutory protected wildlife sites, including SACs, SPAs, Ramsar sites, SSSIs, and Local Wildlife Sites.	No response required.
RR-017	Ecology and Wildlife	Yorkshire Wildlife Trust stated that it may also comment on ground-nesting birds, the proposed mitigation measures, and habitat creation proposals, including the long-term management of these habitats after decommissioning.	No response required.

ID	Theme	Comment	Response
RR-017		Yorkshire Wildlife Trust stated that it engaged with the statutory consultation for the Proposed Development, submitting a response in June 2024, and found the Preliminary Environmental Impact Report (PEIR) well-presented and clear. They are also pleased with the clarity of the content provided at the DCO consultation stage.	No response required.
RR-017	Ecology and Wildlife	Yorkshire Wildlife Trust stated that they acknowledge the removal of Land Area A and Cable Route A-B from the order limits. They are pleased that their previous concerns about the proximity of the order limits to the Sites of Special Scientific Interest at Leven Canal, Tophill Low, and Pulfin Bog have been addressed.	No response required.
RR-017	Ecology and Wildlife	Yorkshire Wildlife Trust stated that, despite the removal of certain land areas, they remain concerned that the SSSIs are sensitive receptors during construction. These important wetland sites form part of the Leven Carrs Wetland Scheme, linking nationally important protected sites including the River Hull, Leven Canal, Pulfin Bog, and Tophill Low.	As explained within Table 7-3, of **ES Volume 2, Chapter 7: Biodiversity [EN010157/APP/6.2 Revision 2]**, Tophill Low Site of Special Scientific Interest (SSSI) and Leven Canal SSSI have been scoped out of the assessment. Pulfin bog SSSI is over 2km from the Proposed Development and is separated from the Site by the busy A1035 road and extensive areas of farmland, therefore it has not been included within the assessment. Leven Carrs Wetland Scheme is not a statutory or non-statutory designated, and therefore has not been assessed as an ecological receptor. Furthermore, Pulfin Bog SSSI, Leven Canal SSSI and Tophill Low SSSI are all situated upstream of the River Hull. Measures aimed to reduce potential effects to the River Hull

ID	Theme	Comment	Response
			will be included within the Construction Environmental Management Plan, if required. However, given that works within 50m of the River Hull are restricted to horizontal directional drilling associated with the grid connection cable route under the river (a commitment for HDD launch/receptor pits to be positioned a minimum of 50m from Main Rivers is secured in the (**Outline CEMP [EN010157/APP/7.2 Revision 2]**), it is anticipated that the measures within the **Outline CEMP [EN010157/APP/7.2 Revision 2]** ensure there would be no significant effects to the SSSI's associated with the Leven Carrs Wetland Scheme.
RR-017	Ecology and Wildlife	Yorkshire Wildlife Trust stated that although Pulfin Bog is now 3.8km from the Proposed Development following revised order limits, it remains part of the Leven Carrs Wetland Scheme, whose boundary lies within the 2km study area used for the DCO application. They expected these SSSIs to be considered relevant in the supporting documentation due to this connection.	The busy A1035 road, large farm complexes, and agricultural fields separate the Proposed Development and Leven Carrs Wetland Scheme. Leven Carrs Wetland Scheme is not a statutory or non-statutory designated site therefore has not been assessed as an ecological receptor. Pulfin Bog SSSI is located more than 2km from the Proposed Development and is located upstream from the Proposed Development therefore has not been included within the assessment. the proposed ecological mitigation areas will potentially improve the area for species associated with the Leven Carrs Wetland Scheme. This is due to their close proximity to the River Hull and Holderness Drain. Furthermore, the local biodiversity will potentially benefit from the proposed mink control within the

ID	Theme	Comment	Response
			Land Areas, especially if the control approach considers the existing projects undertaken by Yorkshire Wildlife Trust.
RR-017	Construction	Yorkshire Wildlife Trust welcomed the inclusion of Outline Construction Environmental Management Plan (CEMP) to support the DCO Application.	No response required.
RR-017	Ecology and Wildlife	Yorkshire Wildlife Trust stated that they note the Applicant has committed to discussions with the landowner regarding the Leven Carrs Wetland Scheme.	This commitment was made when Land Area A was included within the Proposed Development. Land Area A was adjacent to the Leven Carrs Wetland Scheme and a meeting with Albanwise Environment and the Applicant was undertaken in July 2024. However, as Land Area A is no longer within the Proposed Development further discussions with regard to Leven Carrs Wetland Scheme are unlikely to be appropriate given there will be no direct habitat connectivity between the Proposed Development and Leven Carrs Wetland Scheme. Furthermore, Leven Carrs Wetland Scheme is not a statutory or non-statutory designated site, and therefore has not been assessed as an ecological receptor. However, the Landscape and Ecological Management Plan will consider the Hull and East Riding Local Nature Recovery Scheme.
RR-017	Ecology and Wildlife	Yorkshire Wildlife Trust stated that they support Natural England's encouragement for the Applicant to consider Landscape Recovery Projects as key enhancement areas. They also welcome the commitment to produce a Landscape and	The Landscape and Ecological Management Plan will consider the Hull and East Riding Local Nature Recovery Schemes.

ID	Theme	Comment	Response
		Ecological Management Plan (LEMP) post-examination, in consultation with the Hull and East Riding Local Nature Recovery Schemes.	
RR-017	Ecology and Wildlife	Yorkshire Wildlife Trust stated that they welcome the inclusion of a 15-metre buffer around Cote Wood Local Wildlife Site, an ancient woodland, noting that the Forestry Commission considers 15 metres an adequate buffer. They accept this as suitable mitigation against potential negative impacts on the site.	No response required.
RR-017	Ecology and Wildlife	Yorkshire Wildlife Trust stated that they previously commented on five internationally important designated sites within 10 km of the proposal for wintering and breeding birds. They welcome the detailed calculations in the Environmental Statement and Outline LEMP regarding compensation sites for ground-nesting birds.	No response required.
RR-017	Ecology and Wildlife	Yorkshire Wildlife Trust stated that they understand the skylark population was used as the basis for the compensation figures, as surveys showed it to have the largest proportional population.	No response required.
RR-017	Ecology and Wildlife	Yorkshire Wildlife Trust stated that they support the allocation of compensation fields larger than 3 hectares, designed to increase the carrying capacity of ground-nesting birds and adequately compensate for development impacts, based on an evidence-based approach.	No response required.

ID	Theme	Comment	Response
RR-017	Ecology and Wildlife	Yorkshire Wildlife Trust stated that they encourage the Biodiversity Mitigation Strategy's recommendation for a phased construction approach to ensure displaced birds have suitable temporary habitats, and they would be keen to comment further on this.	As detailed within **ES Volume 1, Chapter 3: Proposed Development Description [APP-039]** the Proposed Development will be constructed in phases. Please note that the Biodiversity Mitigation Strategy was only used for consultation purposes and the contents of this document have been incorporated into the **Outline LEMP [EN010157/APP/7.5 Revision 3].**
RR-017	Ecology and Wildlife	Yorkshire Wildlife Trust stated that they are pleased the Applicant's detailed Habitats Regulations Assessment recognises the surrounding agricultural land as functional habitat for lapwing, golden plover, and other species.	No response required.
RR-017	Ecology and Wildlife	Yorkshire Wildlife Trust stated that they believe the conclusion that land within and adjacent to Land Areas B to F is not functionally linked for marsh harrier should be reconsidered. They mentioned that although only one marsh harrier was recorded during surveys, two breeding pairs are known to reside in Tophill Low SSSI, which they consider a sensitive receptor that the applicant should take into account regarding potential development impacts.	Tophill Low SSSI is over 2km from the Order Limits and the breeding habitat associated with this designated site will not be affected by the Proposed Development. As detailed within **ES Volume 4, Appendix 7.3: Breeding Bird Survey Report [APP-107]** no breeding marsh harriers have been recorded within or adjacent to the Proposed Development.
RR-017	Ecology and Wildlife	Yorkshire Wildlife Trust stated that the marsh harrier, classified as Amber under the Birds of Conservation Concern Red List (2021) and protected as a Schedule 1 species during breeding,	Response provided within row above.

ID	Theme	Comment	Response
		should have the order limits and adjacent areas considered as functionally linked land, given the presence of two breeding pairs in the nearby SSSI.	
RR-017	Ecology and Wildlife	Yorkshire Wildlife Trust stated that the information in the Habitats Regulations Assessment (HRA) to Inform Appropriate Assessment is clearly presented. They highlighted that Article 6(3) of the EU Habitats Directive (1992) requires an Appropriate Assessment of plans or projects potentially affecting the integrity of Natura 2000 sites—including SPAs, SACs, and candidate SACs—near the proposed order limits.	No response required.
RR-017	Ecology and Wildlife	Yorkshire Wildlife Trust stated that they appreciate the passage and wintering bird surveys were not completed until April 2025, so the findings will be available at the next consultation stage and may influence the mitigation strategy and compensation area design. They will provide further comments once the full evidence is compiled.	No response required.
RR-017	Ecology and Wildlife	Yorkshire Wildlife Trust stated that they were pleased to see scrapes included in the mitigation design, providing valuable habitat for wading species. They are satisfied that a suitable management plan is proposed to ensure these scrapes retain water through winter, benefiting wintering birds, and they will provide further comments once the passage and wintering bird survey results are available at the examination stage.	No response required.

ID	Theme	Comment	Response
RR-017	Ecology and Wildlife	Yorkshire Wildlife Trust stated that they support the applicant's inclusion of a detailed Habitats Regulations Assessment (HRA), recognising that an Appropriate Assessment will be required. They are pleased the applicant assumes the presence of functionally linked land in the absence of full data and, while they expect to comment further once full survey data is available at the examination stage, they are satisfied that their current concerns have been addressed.	No response required.
RR-017	Ecology and Wildlife	.Yorkshire Wildlife Trust stated that they are pleased the Applicant is committing to achieving a 62.36% net gain across the order limits. They noted that the Biodiversity Mitigation Strategy and Biodiversity Net Gain (BNG) assessment are detailed, with the BNG metric included in the DCO application documents.	Please note that the Biodiversity Mitigation Strategy was only used for consultation purposes and the contents of this document have been incorporated into the **Outline LEMP [EN010157/APP/7.5 Revision 3]**.
RR-017	Ecology and Wildlife	Yorkshire Wildlife Trust stated that significant local benefits for wildlife can be achieved through well-designed solar farms. They are pleased to see the inclusion of a management plan in the Outline LEMP, which commits to monitoring Biodiversity Mitigation and Enhancement Areas during operation to ensure they meet or progress towards the habitat conditions outlined in the Biodiversity Net Gain assessment.	No response required
RR-017	Ecology and Wildlife	Yorkshire Wildlife Trust stated that, in line with Biodiversity Net Gain Good Practice Principles, compensation areas should be secured for at least	The Biodiversity Net Gain (BNG) proposed to be delivered as part of the Proposed Development is presented in **ES Volume 4, Appendix 7.11:**

ID	Theme	Comment	Response
		the lifetime of the development, with the aim of continuing Net Gain management indefinitely. They emphasise the importance of securing these habitat creation and enhancement areas for nature in perpetuity and hope to see this commitment further developed post-examination.	**Biodiversity Net Gain Assessment [APP-114]**. The maintenance and management of the BNG proposed is secured for the lifetime of the Proposed Development in the **Outline LEMP [EN010157/APP/7.5 Revision 3]** which is secured by Requirement 9 of the **Draft DCO [EN010157/APP/3.1 Revision 4]**.
RR-017	Land, Soil and Groundwater	Yorkshire Wildlife Trust stated that detailed management and maintenance information is provided in the Outline LEMP, and they are pleased to see that a soil survey was undertaken in line with their recommendation.	No response required.
RR-017	Ecology and Wildlife	Yorkshire Wildlife Trust noted the inclusion of the impact assessment on Figham Pasture Local Wildlife Site (LWS) and welcome the commitment to promoting native species. They expect further details on seed mixes and potential local donor sites to be provided and may wish to comment once this information is available.	Outline seed mix species are listed within the **Outline LEMP [EN010157/APP/7.5 Revision 3].** Final seed mixes which will consider the use of local donor sites and local plant nurseries will be included within the Landscape and Ecological Management Plan.
RR-017	Ecology and Wildlife	Yorkshire Wildlife Trust stated that further detail is needed to confirm appropriate infrastructure will support livestock use. They noted concerns that relying on landowners to decide later whether to use the land for grazing may affect grassland management and soil recovery, which are key to the biodiversity mitigation strategy. They noted that poor management could negatively impact Biodiversity Net Gain outcomes and risk	Appropriate livestock and livestock densities will be included within the Landscape and Environmental Management Plan.

ID	Theme	Comment	Response
		overestimating the benefits claimed by the Proposed Development..	
RR-017	Ecology and Wildlife	Yorkshire Wildlife Trust stated that they welcome the inclusion of the Outline Decommissioning Environmental Management Plan (DEMP) but believe it needs further development post-examination. They emphasised that habitat creation areas should be secured for nature in perpetuity through legal agreements, rather than potentially being returned to other uses, aligning with Biodiversity Net Gain Good Practice Principles. They will continue to engage on this issue throughout the examination process.	The BNG proposed to be delivered as part of the Proposed Development is presented in **ES Volume 4, Appendix 7.11: Biodiversity Net Gain Assessment [APP-114]**. The maintenance and management of the BNG proposed is secured for the lifetime of the Proposed Development in the **Outline LEMP [EN010157/APP/7.5 Revision 3]** which is secured by Requirement 9 of the **Draft DCO [EN010157/APP/3.1 Revision 4]**. The BNG proposed to be delivered as part of the Proposed Development is presented in **ES Volume 4, Appendix 7.10: Biodiversity Net Gain Assessment [APP-114].** The maintenance and management of the BNG proposed is secured for the lifetime of the Proposed Development in the **Outline LEMP [EN010157/APP/7.5 Revision 3]** which is secured by Requirement 9 of the **Draft DCO [EN010157/APP/3.1 Revision 4].** As set out in the **Outline DEMP [EN010157/APP/7.4 Revision 2]**, at the end of the Proposed Development's lifetime areas of community accessible land and environmental mitigation and enhancement areas will be returned to the landowner in private ownership.

Table 2-19: Beverley Pasture Master Relevant Representation

ID	Theme	Comment	Response
RR-018		Edward Henry Smith of Michael Glover LLP stated he acts as agent for Beverley Pasture Masters, who manage Figham Common.	No response required
RR-018	Cumulative impacts	Beverley Pasture Masters stated that during the consultation process, concerns were raised about the large number of renewable energy projects impacting the East Riding of Yorkshire, noting that multiple nearby developments risk damaging the countryside, especially Figham Common, which is important for grazing and public access.	The Applicant is in discussions with the Pasture Masters and East Riding of Yorkshire Council in relation to the Common and has had meetings with them to discuss the Application. The Applicant will continue to engage with the Pasture Masters through the application process. An assessment of the cumulative and in-combination effects is provided within **ES Volume 2, Chapter 15: Cumulative Effects [APP-051]**. The projects included in the cumulative assessment have been selected based on identifying major developments that: have the same Zone of Influence as the Proposed Development for at least one environmental factor; have temporal crossover in the proposed dates for construction, operation (including maintenance) and/or decommissioning; and are of a scale and nature where a significant effect is likely. The other projects to be included in the cumulative assessment include consented and proposed solar schemes in proximity to the Proposed

ID	Theme	Comment	Response
			Development as well as other Nationally Significant Infrastructure Projects comprising offshore wind farms which are proposing to connect into the existing National Grid Creyke Beck Substation or a proposed new substation further north.
RR-018	Cable route	Beverley Pasture Masters stated concerns about the proposed cable route at Figham Common and its proximity to the Dogger Bank A and B schemes.	The Applicant has engaged with SSE, the developers of the existing Dogger Bank A and B projects and has received details drawings and specifications in regard to the 'as-built' depths of the Dogger Bank A & B cables and the required easements. This information is being used to inform the ongoing design development for the Peartree Hill grid connection cable. The Applicant will continue to engage with SSE to ensure the projects do not impede each other.
RR-018	Construction impacts	Beverley Pasture Masters expressed concerns about the management of Figham Common and maintaining continued public access during the proposed works.	Works within Figham Common will be temporary in duration to construct a section of the cable route from the solar PV development to National Grid Creyke Beck Substation. As set out and secured in the **Design Parameters Document [EN010157/APP/5.8 Revision 2]** and requirement 3 of the **Draft DCO [EN010157/APP/3.1 Revision 4]**, the working width of the grid connection cable route that passes through Figham Common will be a maximum of 30m wide in order to minimise the impacts whilst ensuring that a safe working environment can be provided.

ID	Theme	Comment	Response
			Any launch/reception pits required for the Horizontal Directional Drilling (HDD) underneath the River Hull and Beverley and Barnston Drain will be located within the 30m working width, along with all plant and machinery. Any works areas through Figham Common will be securely fenced using heras fencing for the safety of members of the public and livestock. The measures outlined above are included in the **Outline CEMP [EN010157/APP/7.2 Revision 2].** In accordance with requirement 4 of the **Draft DCO [EN010157/APP/3.1 Revision 4]** the final Construction Environmental Management Plan must be substantially in accordance with the **Outline CEMP [EN010157/APP/7.2 Revision 2]**. The final Construction Environmental Management Plan for each part needs to be approved by the local planning authority before construction can begin on the relevant part. The Applicant hopes this provides some comfort to the Pasture Masters and will continue to engage with the Beverley Pasture Masters prior to agreeing construction timescales. Control measures to mitigate potential impacts of the Proposed Development on Wilberforce Way

ID	Theme	Comment	Response
			are set out in the **Outline Rights of Way and Access Management Plan [EN010157/APP/7.9 Revision 2]**. The production of which is secured by requirement 10 of the **Draft DCO [EN010157/APP/3.1 Revision 4].**
RR-018	Construction impacts	Beverley Pasture Masters expressed health and safety concerns arising from the land's status as a Common.	Health and safety of the public and staff is of the utmost importance to the Applicant. The necessary risk assessments relating to activities within Figham Common will be completed prior to any works commencing. A Construction Environmental Management Plan must be prepared ahead of commencing any part of the Proposed Development and this must be approved by East Riding of Yorkshire Council. The aim of the Construction Environmental Management Plan is to provide a clear and consistent approach to the control of construction activities. An **Outline CEMP [EN010157/APP/7.2 Revision 2]** was submitted with the DCO Application, and the final approved Construction Environmental Management Plan must be substantially in accordance with the **Outline CEMP [EN010157/APP/7.2 Revision 2]**. As set out in the **Outline CEMP [EN010157/APP/7.2 Revision 2]** a Health and Safety Manager, or equivalent role, would be appointed for the construction phase, who would be responsible for the monitoring and

ID	Theme	Comment	Response
			controlling of health and safety compliance and related rules and regulations on site. The DCO Application was supported by an **Outline Rights of Way and Access Management Plan [EN010157/APP/7.9 Revision 2]** which provides details on the management of the existing and Public Rights of Way and newly proposed permissive paths during the construction, operation and decommissioning of the Proposed Development. It details that the diversions and safety measures will be implemented as a priority, so that local communities are still able to safely enjoy the enhanced connectivity routes from the start of construction. Within the **Outline Rights of Way and Access Management Plan [EN010157/APP/7.9 Revision 2]** consideration is given to Wilberforce Way, a long-distance path which crosses Figham Common.
RR-018	Cable	Beverley Pasture Masters expressed concerns regarding the cable depth.	The cable will be buried at a minimum depth of 1.2m below the finished surface. This commitment is secured in the **Design Parameters Document [EN010157/APP/5.8 Revision 2]** via requirement 3 of the **Draft DCO [EN010157/APP/3.1 Revision 4].**
RR-018	Cable	Beverley Pasture Masters raised concerns about potential impacts of the cable on the operation of computer-controlled agricultural machinery.	The grid connection cable will be buried to a minimum depth of 1.2m and up to 1.6m deep, in order for standard farming practices, including

ID	Theme	Comment	Response
			harvests, to continue as usual once installation has occurred. There will be no impact from the construction works on any computer controlled agricultural machinery used on Figham Common. The underground 132kV cable once installed, will not impact any agricultural machinery within Figham Common. RWE has a number of operational sites on which farming machinery is able to operate without interference from the operational solar farm. Information on mitigation measures relating to the cable installation work through Figham Common is provided in the **Outline CEMP [EN010157/APP/7.2 Revision 2].** In accordance with requirement 4 of the **Draft DCO [EN010157/APP/3.1 Revision 4]**, the final Construction Environmental Management Plan must be substantially in accordance with the **Outline CEMP [EN010157/APP/7.2 Revision 2]**.
RR-018	Drainage	Beverley Pasture Masters highlighted concerns regarding the reinstatement of field underdrainage systems after the proposed works.	The Applicant will work with Figham Common landowners, the Pasture Masters and their agent to review any existing land drainage and agree to undertake the necessary surveys required to identify land drains and discuss the appropriate mitigation measures. Information on mitigation measures relating to the grid connection cable's installation work through Figham Common is

ID	Theme	Comment	Response
			provided in the **Outline CEMP [EN010157/APP/7.2 Revision 2]**. These measures are secured via requirement 4 of the **Draft DCO [EN010157/APP/3.1 Revision 4].** Details on mitigation are included in the **Outline LEMP [EN010157/APP/7.5 Revision 3]** which was submitted with the DCO application. These details are secured via requirement 9 of the Draft DCO. As set out in the **Outline Soil Management Plan [EN010157/APP/7.8 Revision 2]**, where sections of field underdrainage systems are identified that may be potentially impacted by the grid connection cable installation this will be addressed by either: Option A - reconnecting the individual field underdrains with new sections of drain across the cable trench; or Option B - a collector drain will be laid along the cable trench and will then connect, at a low point, to a new drainage pipe to take water away. This is secured via Requirement 6 the Draft DCO. The Applicant undertook a flood risk assessment, **ES Volume 4, Appendix 5.6: Flood Risk Assessment [EN010157/APP/6.4 Revision 3]**, which sets out a drainage strategy to integrate with natural drainage on-site to mitigate any potential flood risk created by the Proposed Development. These consider the watercourses, surface water flows and flooding issues for the Proposed Development. The assessment sets out a drainage

ID	Theme	Comment	Response
			strategy to integrate with natural drainage on-site to mitigate any potential flood risk created by the Proposed Development. Existing watercourses and drains will not be modified. The proposed layout has maximised the use of existing watercourse crossings and minimised the number of new ones. Additionally, the Applicant is engaging with the gas pipeline and other utility owners to ensure that the Proposed Development does not impede the utilities.
RR-018	Soil	Beverley Pasture Masters raised concerns about the treatment and reinstatement of soil following the proposed works.	The Applicant has undertaken an assessment of land, soil and groundwater as part of the DCO Application. The conclusions of this assessment are presented in **ES Volume 2, Chapter 10: Land, Soil and Groundwater [APP-046]**. In accordance with requirement 6 of the **Draft DCO [EN010157/APP/3.1 Revision 4]**, a Soil Management Plan must be prepared ahead of commencing any part of the Proposed Development and this must be approved by East Riding Yorkshire Council. The aim of the Soil Management Plan is to: • To ensure the protection and conservation of soil resources across the Site; • To identify best practice measures to maintain the physical properties of the soil on the Site; and

ID	Theme	Comment	Response
			• To provide measures for the management of the soil resource on the Site to mitigate and limit any risk of significant adverse effect on the soil resource as a result of the Proposed Development. The Applicant produced an **Outline Soil Management Plan [EN010157/APP/7.8 Revision 2]** which sets out the monitoring and amelioration procedures that would apply to any soil or drainage problems associated with the Proposed Development. The final approved Soil Management Plan will be agreed with the Local Planning Authority post consent but must be substantially in accordance with the **Outline Soil Management Plan [EN010157/APP/7.8 Revision 2]**. The Applicant will engage with the Figham Pasture Masters on the proposed soil management procedures prior to submission of the SMP to East Riding of Yorkshire Council for approval.
RR-018	Construction impacts	Beverley Pasture Masters expressed concerns about potential damage to the grass sward and its reinstatement after the works.	In accordance with Requirement 9 of the **Draft DCO [EN010157/APP/3.1 Revision 4]**, a Landscape and Ecological Management Plan must be prepared ahead of commencing any part of the Proposed Development and this must be approved by East Riding of Yorkshire Council. The

ID	Theme	Comment	Response
			Landscape and Ecological Management Plan will include provisions for the successful establishment and future management of landscaping and biodiversity works. The Landscape and Ecological Management Plan will include measures to mitigate the effects of the Proposed Development and enhance biodiversity. An **Outline LEMP [EN010157/APP/7.5 Revision 3]** has been submitted with the DCO Application and the final approved Landscape and Ecological Management Plan must be substantially in accordance with the **Outline LEMP [EN010157/APP/7.5 Revision 3]**. The Applicant will work with the Figham Pasture Masters and East Riding of Yorkshire Council on the proposals in the Landscape and Ecological Management Plan in so far as they apply to Figham Common prior to its submission for approval. A post-construction monitoring programme will be included within the Landscape and Ecological Management Plan. As set out in the **Outline LEMP [EN010157/APP/7.5 Revision 3]**, following habitat re-instatement within Figham Pastures Local Wildlife Site (LWS), vegetation would be monitored against the National Vegetation Classification baseline to ensure regrowth is comparable with the

ID	Theme	Comment	Response
			baseline and that no injurious weeds such as thistles or docks establish. If injurious weeds become dominant or tufts do not establish, then remedial management would be put in place. Typically, appropriate botanical surveys of Figham Pastures LWS will be undertaken between May and July in years 1, 2 and 3 after construction works within Figham Common. The surveys will involve an inspection of habitats impacted during the construction phase to ensure that they are being managed accordingly and remain within their pre-construction condition.
RR-018		Beverley Pasture Masters requested the right to submit further comments and evidence during the examination stage and to participate in the hearings.	No response required

Table 2-20: CPRE North and East Yorkshire Relevant Representation

ID	Theme	Comment	Response
RR-019	Land Use	CPRE North and East Yorkshire stated that the Proposed Development is entirely unsuitable for the predominantly flat East Riding of Yorkshire landscape. They stated that the solar arrays and battery energy storage system (BESS) will industrialise the rural area, and the division into multiple land parcels does not lessen this impact.	The starting point for the location of the Proposed Development was the availability of the grid connection at National Grid Creyke Beck Substation. Once the grid connection agreement had been secured, the Applicant sought to find land within the surrounding area that was available and suitable for large scale solar deployment, from an irradiance and topography perspective, while also having regard to environmental and planning constraints. Preference was given to land in close proximity to the point of connection at National Grid Creyke Beck Substation. The location, design and layout of the Proposed Development formed part of an iterative process which was informed and shaped by the environmental assessment process, site selection assessment, project design principles and ongoing engagement and consultation with stakeholders and consultees. Good design influenced every decision, and conservation and enhancement of the local environment sits at the core of the design approach. Central to this is responding positively to the baseline landscape and the ecosystem services it provides and developing an understanding of what it is that the local community values. The project design principles seek to preserve features of the landscape

ID	Theme	Comment	Response
			that contribute to the character and identity of the local area, giving particular consideration to the natural, historic and recreational environment. The potential Landscape and Visual effects of the Proposed Development have been assessed in **ES Volume 2, Chapter 11: Landscape and Visual [APP-047]**.
RR-019	Public Rights of Way	CPRE North and East Yorkshire stated that although the applicant has proposed 'permissive paths' with information boards around the site, they are not convinced that recreational users will actually choose to use these routes to access the open countryside.	As stated in paragraph 13.7.27 of the **ES Volume 2, Chapter 13: Population [APP-049]**, all existing Public Rights of Way (PRoW) will be retained during the operational phase of the Proposed Development. In addition, the Applicant is proposing a network of permissive paths which will be available during the operation (including maintenance) phase. These proposed permissive paths have been designed to retain and improve recreational connectivity around the Site. By increasing the permissive paths network, local residents and tourists from outside the area are more likely to utilise these links as they are more accessible. During the statutory consultation, several respondents raised comments regarding the inclusion of paths, suggested paths at specific locations, and expressed concerns about the potential loss of paths. Stakeholders such as the East Riding Joint Local Access Forum and The British Horse Society have welcomed the proposed permissive path network and requested that access

ID	Theme	Comment	Response
			to these paths be maintained throughout the lifetime of the Proposed Development, which the Applicant has committed to in the **Outline OEMP [EN010157/APP/7.3 Revision 2]** via Requirement 14 of Schedule 2 of the **Draft DCO [EN010157/APP/3.1 Revision 4]**.
RR-019	Cumulative Effects / Landscape and visual	CPRE North and East Yorkshire stated that the cumulative impact of the Proposed Development, together with others nearby, will harm the landscape character of the countryside and be visible from numerous viewpoints and surrounding villages.	**ES Volume 2, Chapter 15: Cumulative Effects [APP-051]** and **ES Volume 4, Appendix 15.2: Cumulative Landscape and Visual Impact Assessment [APP-144]** acknowledge that the Proposed Development, in combination with the four solar farms known as Kenley House, Field House, Turf Carr and Carr Farm Solar Farms, has the potential to create significant cumulative effects on landscape character and visual amenity. A single landscape receptor was identified as experiencing a significant cumulative landscape effect, this was: • LCA 19D: Central Holderness Open Farmland. It was recorded that, “Whilst there are cumulative effects over a wider geographic area, the overall effects are not greater than those identified for the Proposed Development alone.”

ID	Theme	Comment	Response
			Those receptors which would experience significant cumulative visual effects are, together with a summary of the findings, were: • PRoW Tickton bridleway no.5 – "Year 1 and year 10 cumulative significant effects are greater than for those identified for the Proposed Development alone, impacted by Kenley House, Field House and Carr Farm Solar Farms, in addition to the Proposed Development." • Wawne PRoW located between Weel and Wawne – "Year 1 and year 10 cumulative significant effects have been identified, primarily caused by Kenley House Solar Farm development in its own right." • Meaux Lane/Meaux Road – "Significant cumulative effects identified, but overall not greater than those identified for the Proposed Development alone." • PRoW Riston footpath no.2 – "Significant cumulative effects identified, but overall not greater than those identified for the Proposed Development alone." • PRoW Riston footpath no.1 – "Significant cumulative effects identified, but overall not greater

ID	Theme	Comment	Response
			than those identified for the Proposed Development alone." • Swine PRoW located to the east of Wawne and the south-east of Land Areas C and F – "Year 1 and year 10 cumulative significant effects have been identified, primarily caused by Turf Carr Solar Farm development in its own right." • Kidhill Lane – "Year 10 cumulative significant effects have been identified (not significant from the Proposed Development alone), due to combination with Turf Carr Solar Farm". • Springdale Farm (residential property) – "Year 10 cumulative significant effects have been identified (not significant from the Proposed Development alone)." With respect to the surrounding villages, it is evidenced within **ES Volume 2, Chapter 11: Landscape and Visual [APP-047]** that significant visual effects have not been identified on any local villages, with the operational Proposed Development largely not visible from the surrounding villages. As detailed in Section 11.9 of **ES Volume 2, Chapter 11: Landscape and Visual [APP-047]** the villages most likely to be visually impacted by the Proposed Development are:

ID	Theme	Comment	Response
			• Long Riston (including Arnold) – Year 1 effects **moderate/minor adverse** and Year 10 effects **minor/negligible adverse**. • Routh – Year 1 effects **minor/negligible adverse** and Year 10 effects **minor/negligible adverse**. • Weel – Year 1 effects **moderate/minor (tending towards minor) adverse** and Year 10 effects **minor/negligible (tending towards negligible) adverse**.

Table 2-21: Dogger Bank Offshore Wind Farm Project 4 Projco Limited Relevant Representation

ID	Theme	Comment	Response
RR-020		Dogger Bank D Offshore Wind Farm (DBD), a 1.5GW offshore wind project developed by SSE Renewables and Equinor, is in the pre-application stage for a Development Consent Order (DCO). Located over 210km off the Yorkshire coast, DBD aims to support UK energy decarbonisation. A Scoping Report was submitted in June 2024, with a Scoping Opinion received in August 2024. A Preliminary Environmental Information Report will be submitted in June 2025 for consultation.	The Applicant notes this comment.
RR-020	General	Dogger Bank D supports the Proposed Development, recognising its contribution to energy security, renewable energy generation, and the UK's transition to Net Zero in line with government policy. Both projects are significant renewable developments in the East Riding of Yorkshire.	The Applicant notes this comment.
RR-020	Cumulative impacts	DBD (SSE Renewables and Equinor) wishes to register as an Interested Party in the Peartree Hill Solar Farm Examination due to the geographical proximity of the two projects' onshore infrastructure and the potential for cumulative environmental effects.	The project management teams on both the Proposed Development and the Dogger Bank schemes have met to talk through the interrelationships between the projects. This engagement will continue as the projects progress. Dogger Bank D was added to the shortlist for consideration in the cumulative effects assessment within **ES Volume 2, Chapter 15: Cumulative Effects [APP-051]**.

Table 2-22: East Riding of Yorkshire and Kingston upon Hull Joint Local Access Forum Relevant Representation

ID	Theme	Comment	Response
RR-021		The East Riding of Yorkshire and Kingston upon Hull Joint Local Access Forum (JLAF) stated it is a statutory advisory body that protects Public Rights of Way (PRoW), promotes their use for countryside access and public health, and ensures they are legally safeguarded as part of the King's Highway, with routes recorded on the Definitive Map maintained by East Riding of Yorkshire Council.	No response required
RR-021	PROWs	JLAF stated that the Proposed Development, along with its interconnecting and export cable corridors, would impact numerous Public Rights of Way (PRoW), either directly or due to their close proximity.	There may be a requirement for some PRoW to be temporarily managed or closed for a short duration during the construction phase of the Proposed Development. **ES Volume 2, Chapter 13: Population [APP-049]** considers the impact to users of PRoW and concludes that there are no significant adverse effects as a result of these temporary changes. During operation of the Proposed Development, all existing PRoW will be retained. The Proposed Development design incorporates a minimum offset distance of 10m from all PRoW including new planting, where reasonably practicable, as secured within the **Outline Rights of Way and Access Management Plan [EN010157/APP/7.9 Revision 2]** and there will be no requirement for temporary or permanent closures of any PRoW during operation. Further details on retaining and managing PRoW during the operational phase are described in section 4.2 of the **Outline Rights of Way**

ID	Theme	Comment	Response
			and Access Management Plan [EN010157/APP/7.9 Revision 2]. The Applicant is also proposing to provide a network of new permissive paths which will be available during the operational phase and are detailed in **ES Volume 3, Figure 3.4: Indicative Environmental Masterplan [APP-058]** and are secured by the **Outline LEMP [EN010157/APP/7.5 Revision 3]**. The new permissive paths have been designed to retain and improve the recreational connectivity of the existing PRoW around the Site.
RR-021	PROWs	JLAF stated that while they did not object to the Proposed Development, they raised the following representation: any proposed temporary diversions of Public Rights of Way must be discussed with, and be acceptable to, East Riding of Yorkshire Council's Countryside Access Team and Definitive Map Officers.	The Applicant notes this comment. As set out in the **Outline Rights of Way and Access Management Plan [EN010157/APP/7.9 Revision 2]**, there are no temporary PRoW diversions proposed as part of the Proposed Development. The **Outline Rights of Way and Access Management Plan [EN010157/APP/7.9 Revision 2]** sets out that any temporary closures required would be consulted on with East Riding of Yorkshire Council in advance of these taking place.
RR-021	PROWs	JLAF stated that the duration of each temporary closure and/or diversion should be minimised, recommending that it be less than three months.	There are a number of PRoWs on the grid connection cable route which will be intersected by the cable that will be installed. It is anticipated that the works required to install the grid connection cable will be short in duration (less than 3 months), meaning any potential PRoW management and/or closures will be short-term.

ID	Theme	Comment	Response
			Similarly, PRoWs within the Land Areas will not be temporarily closed for longer than three months. The **Outline Rights of Way and Access Management Plan [EN010157/APP/7.9 Revision 2]** has been updated to confirm that the duration of temporary PRoW closures would be limited to a maximum of three months, with the exception of any unforeseen delays outside of the Applicant's control.
RR-021	PROWs	JLAF stated that the Applicant should provide a timetable for the closure of Public Rights of Way (PRoW), which should be managed on a rolling basis both geographically and temporally, to avoid closing all PRoW in the Development Area for the entire duration of the installations.	The Applicant is willing to commit to this requirement. The **Outline Rights of Way and Access Management Plan [EN010157/APP/7.9 Revision 2]** has been updated to include a commitment to providing further details on a timetable for closure of PRoW within the Rights of Way and Access Management Plan, once a Principal Contractor has been appointed. These details will be linked to the construction phasing works.
RR-021	PROWs	JLAF stated that the Development Consent Order (DCO) should specify that the permissive footpaths and bridleways mentioned in the application be formally designated as such for the entire lifetime of the solar farm.	The permissive paths are authorised under Work No. 3 of Schedule 1 to the **Draft DCO [EN010157/APP/3.1 Revision 4]**. Access to the permissive paths for the lifetime of the Proposed Development is secured through the **Outline OEMP [EN010157/APP/7.3 Revision 2]** ("Access to footpaths, including the permissive paths to be provided as part of the Proposed Development, will be maintained throughout the operational (including maintenance) phase of the Proposed Development"), which is secured by Requirement 14 of the **Draft DCO [EN010157/APP/3.1 Revision 4]**. There are no new bridleways proposed within the Order Limits, although several of the permissive paths within Land

ID	Theme	Comment	Response
			Areas D and E have been identified as accessible to horse riders (see paragraph 3.9.17 in the **Planning Statement [APP-147]**). As set out in the **Outline LEMP [EN010157/APP/7.5 Revision 3]**, the surfacing of permissive paths is yet to be determined, but the Applicant would explore options in consultation with the Community Liaison Group. This has been updated to state that options regarding the waymarking of permissive paths would also be explored with the Community Liaison Group.
RR-021	PROWs	JLAF stated that the Applicant and any subsequent owners of the cables should be required to take medium-term responsibility - lasting seven years from completion - for restoring any surface settlement where Public Rights of Way cross disturbed ground, as soil settlement is expected and could negatively affect access.	Following reinstatement of a PRoW located within the grid connection cable corridor, for a period of up to seven years, should any settlement be identified, this could be reported to the Agricultural Liaison Officer, Community Liaison Officer or East Riding of Yorkshire Council's Countryside Access Team by a member of the public or landowner. An inspection to identify if any repair is required would be arranged. Should any restoration works be required that are attributed to the Proposed Development, they would be agreed with East Riding of Yorkshire Council and the relevant landowner and undertaken by the Applicant. This commitment has been added to the updated **Outline Rights of Way and Access Management Plan [EN010157/APP/7.9 Revision 2]**, which will be submitted at Deadline 1.
RR-021	PROWs	JLAF stated that the Applicant should be required to identify how the Proposed Development will enhance existing Public Rights of Way within the development area and its vicinity, in line with the	**ES Volume 1, Chapter 3: Proposed Development Description [APP-039]** provides details of the proposals to provide a network of new permissive paths as part of the Proposed Development design. The new permissive paths

ID	Theme	Comment	Response
		National Planning Policy Framework (Revised; paragraph 105).	aim to maintain and improve connectivity in and around the Site and in the local area through connecting to existing PRoW. This is in accordance with National Planning Policy Framework paragraph 105 which states *"Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails."* As stated in the updated **Outline LEMP [EN010157/APP/7.5 Revision 3]**, which is submitted at Deadline 1, the surfacing and waymarking of permissive paths is yet to be determined, but the Applicant would explore options in consultation with the Community Liaison Group. The Applicant will also consult with the Community Liaison Group regarding waymarking of existing PRoW that cross the Site. Beyond this, no enhancement of existing PRoW is proposed given that effects of the Proposed Development on PRoW are not significant, taking into account the measures proposed in the **Outline Rights of Way and Access Management Plan [EN010157/APP/7.9 Revision 2]**. The new permissive paths are restricted to the Land Areas (and not the grid connection cable route) as this land will remain in the control of the Applicant for the lifetime of the Proposed Development.

ID	Theme	Comment	Response
			As the permissive paths form an integral part of the Proposed Development design, they are not considered enhancements within the context of NPS EN-3.
	PROWs	JLAF stated that the Applicant should be required to give an undertaking to provide a reasonable annual developer contribution through a Section 106 agreement to East Riding of Yorkshire Council. This fund would be used to deliver improvements to PRoWs and access in the parishes affected by the photovoltaic arrays and crossed by the cable corridors.	**ES Volume 2, Chapter 13: Population [APP-049]** concludes no significant effects on walkers, cyclists and horse riders via impacts to PRoW during construction, operation and decommissioning of the Proposed Development. In addition, the Applicant is proposing to provide a network of new permissive paths which are detailed in the **ES Volume 3, Figure 3.4: Indicative Environmental Masterplan [APP-058]**. The new permissive paths have been designed to retain and improve the recreational connectivity of the existing PRoW around the Site. Management of PRoW within the Order Limits is set out in the **Outline Rights of Way and Access Management Plan [EN010157/APP/7.9 Revision 2]** and secured through the requirements in Schedule 2 of the **Draft DCO [EN010157/APP/3.1 Revision 4]**. Access to the proposed new permissive path network for the lifetime of the Proposed Development is secured through the **Outline OEMP [EN010157/APP/7.3 Revision 2]**, which is secured by Requirement 14 of the **Draft DCO [EN010157/APP/3.1 Revision 4]**. As there are not anticipated to be any significant effects on access to the PRoW network and appropriate mitigation measures are already secured, a contribution to additional improvements to PRoW and access is not considered necessary to make the Proposed Development acceptable in planning terms. The Applicant is, however, committed to

ID	Theme	Comment	Response
			providing a Community Benefit Fund, which sits outside the DCO Application. On previous projects Community Benefit Funds have been used to deliver initiatives that include public rights of way improvements.
RR-021	PROWs	JLAF stated that the Secretary of State should consider whether the Development Consent Order (DCO) application includes appropriate mitigation measures to address the Proposed Development's impact on Public Rights of Way and countryside access, in line with the Overarching National Policy Statement for Energy EN-1, paragraphs 5.11.30 and 5.11.31.	Appendix 1: Policy Accordance Tables, to the **Planning Statement [APP-147]** sets out the DCO Application's accordance with NPS EN-1 paragraphs 5.11.30 and 5.11.31. This explains that that the **Outline Rights of Way and Access Management Plan [EN010157/APP/7.9 Revision 2]** includes the mitigation, management and monitoring measures for the public rights of way affected by construction. **ES Volume 2, Chapter 11: Landscape and Visual [APP-047]** also sets out mitigation planting that is proposed around public rights of way to reduce adverse landscape and visual effects for users.
RR-021	PROWs	JLAF stated that the Development Consent Order (DCO) should specify the distances between Public Rights of Way (PRoW) and the security fencing around the solar panel arrays, ensuring these distances minimise any loss of visual amenity for PRoW users. Additionally, the fencing should be as transparent as possible and of a height that balances security needs without unduly obstructing distant views for users.	As secured by the **Outline Rights of Way and Access Management Plan [EN010157/APP/7.9 Revision 2]**, the Proposed Development incorporates a minimum offset distance of 10m from all PRoW. Table 11-10 in **ES Volume 2, Chapter 11: Landscape and Visual [APP-047]** states that this measure will minimise the level of visual change for users of the PRoW network. As set out in Table 3-5 in **ES Volume 1, Chapter 3: Proposed Development Description [APP-039]**, the perimeter security fence around operational areas of the Proposed Development will be a post and wire deer fence, measuring up to 2m in height. The 2m height is required for security purposes and reflects industry standard. The post

ID	Theme	Comment	Response
			and wire fencing proposed is relatively fine (comparable to stock proof fencing) and therefore exhibits a high degree of visual permeability. These parameters are secured by the **Design Parameters Document [EN010157/APP/5.8 Revision 2]**.
RR-021	PROWs	JLAF stated that the Development Consent Order (DCO) should consider the former Secretary of State for the Environment's extension of the deadline to January 2031 for submitting claims of historical rights of way not recorded on the Definitive Map, as well as the current Secretary of State's intention to abandon this deadline. The DCO should require the Applicant to accommodate any approved claims by adjusting the solar panel array layout or, if necessary, seek approval for and cover the costs of acceptable permanent diversions.	The Applicant has been engaging with the ERYC Definitive Map Officer regarding historical rights of way not currently recorded on the Definitive Map and will continue to liaise with them.

Table 2-23: The British Horse Society Relevant Representation

ID	Theme	Comment	Response
RR-023	Public Rights of Way	The British Horse Society welcomed the proposed 9.6km of routes accessible to horse riders and stated it would not support any reduction in that length.	There will be no loss of bridleways as part of the Proposed Development. The Applicant is including a network of new permissive paths as part of the Proposed Development. The permissive paths in Land Areas D and E are proposed to include horse riding rights, as shown in the **Outline LEMP [EN010157/APP/7.5 Revision 3]**, which is secured via Requirement 9 of Schedule 2 of the **Draft DCO [EN010157/APP/3.1 Revision 4]**, and on **ES Volume 3, Figure 3.1: Indicative Operational Layout Plan [APP-055]**. These are routes which can be used by the public during the lifetime of the Proposed Development but will not become a permanent right of way, unless formal applications are made following decommissioning of the Proposed Development.

Table 2-24: Weel Solar Action Group Relevant Representation

ID	Theme	Comment	Response
RR-024		Weel Solar Action Group stated it is a group that formed in response to a 49.9MW solar farm proposal near their village of Weel, which connected two previously approved 49.9MW solar farms. The group is supportive of well-planned green energy projects and noted that the initial solar farms and a nearby wind farm were accepted with little objection.	No response required.
RR-024		Weel Solar Action Group stated that the Visit Yorkshire website describes Weel as a quaint village near Beverley in East Yorkshire, surrounded by lush countryside and known for its peaceful environment—making it an ideal place for nature lovers seeking a tranquil English countryside experience.	No response required.
RR-024	Cumulative impacts	Weel Solar Action Group stated that Weel, Tickton and surrounding areas should serve as a national example of balancing clean energy generation with preserving rural communities and the countryside. However, they stated that solar companies are rushing to develop every available space without	The Applicant recognises that it is one of a number of solar developments within East Riding. As a starting point, proposals of this nature require a connection to the electricity network, suitable topography and irradiance and land availability. These basic factors can lead to solar development being more suited to specific locations, for example in parts of East Riding.

ID	Theme	Comment	Response
		proper coordination or consideration, resulting in a patchwork of solar farms that risk overwhelming and encircling their village.	A full cumulative effects assessment has been completed to understand the impacts of the Proposed Development in the context of other developments in the surrounding area (including the other solar developments). Full details of this assessment are available in **ES Volume 2, Chapter 15: Cumulative Effects [APP-051]**. Furthermore, following significant adverse inter-project cumulative effects being anticipated as a result of the other existing and/or approved solar farm developments identified during the operational phase of the Proposed Development, **ES Volume 4, Appendix 15.2: Cumulative Landscape and Visual Impact Assessment [APP-144]** was produced to provide further detail on each of the other solar farm developments and the potential inter-project cumulative effects anticipated in combination with the Proposed Development. The solar developments predicted to result in significant adverse effects in combination with the Proposed Development were as follows: • 22/01208/STPLF Kenley House Solar Farm; • 22/00824/STPLF Field House Solar Farm; • 22/02775/STPLF Turf Carr Solar Farm; and • 22/03648/STPLF Carr Farm Solar Farm. Where possible, potential environmental effects in relation to landscape and visual impacts for the Proposed Development have been mitigated through measures such as the

ID	Theme	Comment	Response
			incorporation of buffers from sensitive receptors and the provision of screening vegetation planting, as detailed in **ES Volume 2, Chapter 11: Landscape and Visual [APP-047]** and set out within the **Outline LEMP [EN010157/APP/7.5 Revision 3]**.
RR-024	Visual Impacts	Weel Solar Action Group stated that they would like the Proposed Development to be set back further from the edges of the roads and footpaths near their village. Weel Solar Action Group also requested a 20-metre buffer zone alongside every footpath and road.	The Applicant has sought to minimise landscape and visual impacts while striking a balance with the efficient use of land for the generation of renewable energy. This includes a number of design iterations which has seen parcels reduced or removed from the Proposed Development. Following the Environmental Impact Assessment Scoping stage, solar PV modules were removed from Fields E13 and E14 (i.e. the fields closest to Weel), as shown on **ES Volume 3, Figure 4.1: Stage 1 Layout Masterplan [APP-061]** compared with **ES Volume 3, Figure 3.1: Indicative Operational Layout Plan [APP-055].** The Applicant has committed to offsets which have been incorporated into the design. For example, Table 11-10 of **ES Volume 2, Chapter 11: Landscape and Visual [APP-047]** explains *"The Proposed Development design will incorporate a minimum offset distance of 10m from all public rights of way, including new planting where reasonably practicable"* to minimise the level of visual change for users of the PRoW network, and this measure is secured through the **Outline Rights of Way and Access Management Plan [EN010157/APP/7.9 Revision 2]**. **ES Volume 2, Chapter 11: Landscape and Visual [APP-047]** acknowledges that the Proposed Development would create

ID	Theme	Comment	Response
			some significant visual impacts on a small number of receptors. However, the visual effects of the Proposed Development on the village of Weel during construction are considered in detail in Paragraphs 11.9.74 – 11.9.79 of **ES Volume 2, Chapter 11: Landscape and Visual [APP-047]** and the effects are assessed as being **minor adverse** and **not significant**. The visual effects during operation are considered in Paragraphs 11.9.273 – 11.9.281 of **ES Volume 2, Chapter 11: Landscape and Visual [APP-047]** and the Year 1 effects are assessed as **moderate/minor (tending towards minor) adverse** and **not significant** and the Year 10 effects as **minor/negligible (tending towards negligible) adverse** and **not significant**. As set out in Table 11-15 in **ES Volume 2, Chapter 11: Landscape and Visual [APP-047]**, visual effects on 'Tickton PRoW located between Tickton and Weel' and on 'Wawne PRoW located between Weel and Wawne' are also anticipated to be **not significant** during the construction and operational phases.
RR-024	Environment	Weel Solar Action Group requested that the 20-metre buffer zone along roads and footpaths be planted with quality woodland. They believe this woodland would enhance the Proposed Development's biodiversity targets and provide the local community with much-needed separation from the solar panels, improving their enjoyment of the area.	**Table 11-10** of **ES Volume 2, Chapter 11: Landscape and Visual [APP-047]** explains "The Proposed Development design will incorporate a minimum offset distance of 10m from all public rights of way, including new planting where reasonably practicable." Embedded mitigation for the Proposed Development includes planting of screening vegetation, as set out in Table 11-10 in **ES Volume 2, Chapter 11: Landscape and Visual [APP-047]**, the maintenance of which is set out in the **Outline LEMP**

ID	Theme	Comment	Response
		They note that this would reduce the Proposed Development's capacity by less than one percent but would have a significant positive impact on the community.	**[EN010157/APP/7.5 Revision 3]**. The visual effects on the village of Weel, during operation, are considered in Paragraphs 11.9.273 – 11.9.281 of **ES Volume 2, Chapter 11: Landscape and Visual [APP-047]** and the Year 1 effects were assessed as **moderate/minor (tending towards minor) adverse** and **not significant** and the Year 10 effects as **minor/negligible (tending towards negligible) adverse** and **not significant**. The net gain for biodiversity has been calculated, in line with best and current guidance, at 62.36% for area habitats (including woodland creation and retention), as well as 46.48% for hedgerow habitats and 12.50% for watercourse habitats. Therefore, the post-development landscaping represents a significant improvement for biodiversity within the area. The full details of this are included in **ES Volume 4, Appendix 7.11: Biodiversity Net Gain Assessment [APP-114]**.
RR-024	Cumulative impacts	Weel Solar Action Group expressed concern about the cumulative impact of multiple solar farms in their area. They feel it is unfair to endure the effects of a large national infrastructure solar project while also facing additional 49.9MW solar farms being proposed nearby. They noted that their Parish Council, local councillors, and East Riding of Yorkshire Council share these concerns.	The Applicant recognises that it is one of a number of solar developments within East Riding. As a starting point proposals of this nature require a connection to the electricity network, suitable topography and irradiance and land availability. These basic factors can lead to solar development being more suited to specific locations, for example in parts of East Riding. The Applicant is in consultation with East Riding of Yorkshire Council, however decision making in regard to other developments is not within the Applicant's control. The cumulative effect of the Proposed Development on other solar farms in the area has been assessed in **ES Volume 2,**

ID	Theme	Comment	Response
			Chapter 15: Cumulative Effects [APP-051], and **ES Volume 4, Appendix 15.2: Cumulative Landscape and Visual Impact Assessment [APP-144]** where it was reported that there would be a significant effect for landscape and visual as a result of the other solar developments. The assessment methodology for how other developments are selected to be included in the cumulative effects assessment is described in section 15.4 of **ES Volume 2, Chapter 15: Cumulative Effects [APP-051].** The Applicant is continually monitoring other developments that may give rise to intra-project cumulative effects with the Proposed Development and **ES Volume 2, Chapter 15: Cumulative Effects [APP-051]** may be updated accordingly throughout the examination. The Applicant recognises that the Proposed Development is the largest of all the solar developments in the area, with this comes significant benefits in meeting the UK Government's energy targets. The Applicant has assessed fully, the effects of all other developments that met the inter project cumulative effects criteria detailed in **ES Volume 2, Chapter 15: Cumulative Effects [APP-051].**
RR-024	Cumulative impacts	Weel Solar Action Group stated that East Riding of Yorkshire Council recently rejected Albanwise Synergy's 49.9MW Carr Farm Solar Farm proposal, which would link two previously approved solar farms and	This is noted. The Applicant cannot comment on third party applications.

ID	Theme	Comment	Response
		is adjacent to the Proposed Development However, Albanwise Synergy has appealed this decision, forcing the community to continue opposing the project at appeal. WSAG find this frustrating and believe it undermines the smooth delivery of good green energy projects.	
RR-024	Cumulative impacts	Weel Solar Action Group stated that there is a fourth 49.9MW project, Drove Lane Solar Farm, currently under consultation less than 1 km from their village. They consider it a very poor proposal and are actively opposing it as well.	This is noted. The Applicant cannot comment on third party applications.
RR-024	Cumulative impacts	Weel Solar Action Group stated that to support the Proposed Development, they need assurance that the Planning Inspectorate will respect East Riding of Yorkshire Council's decisions and reject any further nearby solar farm proposals due to cumulative impact concerns. They warn that if the Albanwise Synergy appeal is not rejected and the Drove Lane project proceeds, then they will be forced to oppose the Proposed Development.	No response required.

ID	Theme	Comment	Response
RR-024	Cumulative impacts	Weel Solar Action Group cited UK government guidance on green energy projects emphasising that local planning authorities must consider technology requirements and, importantly, potential local environmental impacts, including cumulative effects. They note that the guidance also stresses the need to listen to local communities affected. It highlights that cumulative visual impacts occur when two or more similar renewable developments are visible from the same location or along the same route.	The Applicant acknowledges the UK government guidance and its place within the hierarchy of relevant planning policy. Furthermore, the Applicant recognised the importance of consultation as a key part of the DCO process. A range of consultees, including prescribed bodies, local authorities, land interests, and local communities, have been provided with appropriate opportunities to comment on the Proposed Development. Feedback received has been considered carefully and, where appropriate, has informed changes to the design. Cumulative effects have been assessed in **ES Volume 2, Chapter 15: Cumulative Effects [APP-051]**.
RR-024		Weel Solar Action Group emphasised the need to preserve areas for people to enjoy the countryside, for mental health, horse riding, wildlife movement, and food production to protect farming jobs. They called for gaps or “breathing space” between solar fields, seeking a fair and balanced approach. Their position is that they support some solar development, but not all.	As part of the Proposed Development, a network of new permissive paths is proposed to help improve local connectivity in the area. As part of the ongoing stakeholder engagement for the Proposed Development, stakeholders such as the East Riding of Yorkshire and Kingston upon Hull Joint Local Access Forum and The British Horse Society have welcomed the proposed permissive path network and requested that access to these paths be maintained throughout the lifetime of the Proposed Development, which the Applicant has committed to in the **Outline OEMP [EN010157/APP/7.3 Revision 2]**.

2.5 Members of the public, landowners and businesses

2.5.1 The table below set out the responses to the Relevant Representations from members of the public, landowners and businesses and the response from the Applicant.

Table 2-25 Public Relevant Representations

Ref number(s)	Theme	Matter raised	Response
RR-027, RR-041, RR-033	BESS	Concern regarding fire risk associated with BESS	Battery storage is an integral component of renewable energy technologies, storing excess energy during periods of peak generation or low demand and releasing it during peak demand or in case of power outages. This safe and proven technology would support the Proposed Development to generate a consistent and reliable renewably generated power supply, even when the sun is not shining. The BESS, inverters and DC-DC converters will be arranged together, known as 'hybrid packs. Each hybrid pack would comprise four BESS units, one inverter and four DC-DC converters arranged as shown in the **ES Volume 3, Figure 3.1: Indicative Operational Layout Plan [APP-055].** Battery storage as part of the Proposed Development has been located within the land areas to minimise impacts on any relevant designations and local communities, while remaining accessible for maintenance. The technology underpinning battery storage is well established and extensively used in various facets of our daily lives. The battery units proposed for the Proposed Development have long lives, charging and dis-charging thousands of times. An **Outline**

Ref number(s)	Theme	Matter raised	Response
			Battery Safety Management Plan (BSMP) [EN010157/APP/7.6 Revision 2] has been developed, which outlines the Applicant's strategies, protocols, and commitments, ensuring that battery storage at the Proposed Development adheres to the highest standards and contributes seamlessly to the overall success of the solar farm project. The Applicant's intention is to use an automatic clean agent for fire suppression rather than a water-based system as it is considered a more appropriate system for combatting electrical fires, it reduces the need for large on-site water, and it reduces the risk of contamination from firewater. Water for firefighting purposes would be sourced from the nearest available supply: this water would be used only to cool areas adjacent to a battery storage container to prevent fire spread, rather than being used to attempt to directly fight a fire within a battery storage container. The Battery Safety Management Plan is secured via Requirement 8 of the **Draft Development Consent Order (DCO) [EN010157/APP/3.1 Revision 4]** and must be substantially in accordance with the **Outline BSMP [EN010157/APP/7.6 Revision 2].** Relevant works will not begin until this plan is approved by the local planning authority, following consultation with the Humberside Fire and Rescue Service.
RR-027, RR-033	BESS	Concern regarding pollution risks associated with BESS / Concern regarding impact of	An **Outline BSMP [EN010157/APP/7.6 Revision 2]** has been produced which identifies the key standards, guidelines, and principles the Applicant will adhere to during the detailed design

Ref number(s)	Theme	Matter raised	Response
		fumes associated with BESS fire on human health	and operation of the BESS within the Proposed Development. This **Outline BSMP [EN010157/APP/7.6 Revision 2]** has been produced in order to respond to the risks and concerns around the potential for a battery fire event at a BESS. The Battery Safety Management Plan is secured via Requirement 8 of the **Draft DCO [EN010157/APP/3.1 Revision 4]** and must be substantially in accordance with the **Outline BSMP [EN010157/APP/7.6 Revision 2]**. Relevant works will not begin until this plan is approved by the local planning authority, following consultation with the Humberside Fire and Rescue Service.
RR-027	BESS	Concern regarding impact on ecosystems associated with BESS	The impact on biodiversity has been fully assessed within **ES Volume 2, Chapter 7: Biodiversity [EN010157/APP/6.2 Revision 2]** and mitigation described within this chapter. This mitigation includes a buffer of 15m from ancient woodland, and 10m from other woodlands, hedgerows, and watercourses. There would also be a 3m high acoustic barrier installed around the BESS. With these mitigation measures in place, there is not predicted to be a significant adverse environmental effect on ecological receptors. An **Outline BSMP [EN010157/APP/7.6 Revision 2]** has also been produced which identifies the key standards, guidelines, and principles the Applicant will adhere to during the detailed design and operation of the BESS within the Proposed Development. This **Outline BSMP [EN010157/APP/7.6**

Ref number(s)	Theme	Matter raised	Response
			Revision 2] responds to the risks and concerns around the potential for a battery fire event at a BESS.
RR-027, RR-033	BESS	Concern regarding impact of fumes associated with BESS fire on wildlife health	An **Outline BSMP [EN010157/APP/7.6 Revision 2]** has been produced which identifies the key standards, guidelines, and principles the Applicant will adhere to during the detailed design and operation of the BESS within the Proposed Development. This **Outline BSMP [EN010157/APP/7.6 Revision 2]** has been produced in order to respond to the risks and concerns around the potential for a battery fire event at a BESS. The document sets out measures to minimise the impact of a BESS related fire. The final Battery Safety Management Plan is secured via Requirement 8 of the **Draft DCO [EN010157/APP/3.1 Revision 4]** and must be substantially in accordance with the **Outline BSMP [EN010157/APP/7.6 Revision 2].** Relevant works will not begin until this plan is approved by the local planning authority, following consultation with the Humberside Fire and Rescue Service.
RR-027	BESS	Statement that evacuation would be required due to fumes associated with BESS fire	An **Outline BSMP [EN010157/APP/7.6 Revision 2]** has been produced which identifies the key standards, guidelines, and principles the Applicant will adhere to during the detailed design and operation of the BESS within the Proposed Development. This **Outline BSMP [EN010157/APP/7.6 Revision 2]** has been produced in order to respond to the risks and concerns around the potential for a battery fire event at a BESS. As described in the **Outline BSMP [EN010157/APP/7.6 Revision 2]**, labels and signage will be installed clearly showing dangerous, electrical

Ref number(s)	Theme	Matter raised	Response
			equipment/areas and evacuation locations. The Battery Safety Management Plan is secured via Requirement 8 of the **Draft DCO [EN010157/APP/3.1 Revision 4]** and must be substantially in accordance with the **Outline BSMP [EN010157/APP/7.6 Revision 2]**. Relevant works will not begin until this plan is approved by the local planning authority, following consultation with the Humberside Fire and Rescue Service.
RR-027	BESS	Statement that there is not enough firefighting resource to control a fire from a BESS	As part of preparing the **Outline BSMP [EN010157/APP/7.6 Revision 2]** the Applicant has consulted Humberside Fire and Rescue Service. Firefighting resource has not been raised as an issue during these discussions. The Applicant will continue to engage with Humberside Fire and Rescue Service, including developing Emergency Response Plans and carrying out suitable training exercises with the Fire and Rescue Service.
RR-027	BESS	Concern regarding loss of habitat to install BESS	The effect of habitat loss has been assessed within **ES Volume 2, Chapter 7: Biodiversity [EN010157/APP/7.2 Revision 2]** and an **Outline Landscape and Ecological Management Plan (LEMP) [EN010157/APP/7.5 Revision 3]** has been produced which sets out the establishment and future management of biodiversity and landscaping works. As set out in the **Outline LEMP [EN010157/APP/7.5 Revision 3]**, the Proposed Development design incorporates a minimum offset distance of 10m from any existing woodland, trees (from the edge of the canopy) and hedgerows, where reasonably practicable, and a

Ref number(s)	Theme	Matter raised	Response
			minimum offset distance of 15m from any ancient woodland (from the edge of the canopy). The Proposed Development design also incorporates ecological mitigation and enhancement areas that will remain free of solar PV development to provide continued availability of habitat for ground nesting birds, as well as creating suitable habitat for wintering birds and a range of other species, such as meadow grassland, legume rich sowing, hedgerows, and field margin sowing. including the creation of mitigation areas to mitigate potential habitat loss. The proposed locations of BESS have been considered in **ES Volume 4, Appendix 7.10: Biodiversity Net Gain Assessment [APP-114]**, which concludes that the Proposed Development would result in a 62.36% net gain in biodiversity for area habitat units, taking into account the habitat creation that is proposed.
RR-027	BESS	Concern regarding health risks associated with living in proximity to BESS	An **Outline BSMP [EN010157/APP/7.6 Revision 2]** has been produced which identifies the key standards, guidelines, and principles the Applicant will adhere to during the detailed design and operation of the BESS within the Proposed Development. The Applicant has not undertaken a standalone health impact assessment as potential health impacts arising from the construction and operation (include maintenance) of the Proposed Development are considered within **ES Volume 2, Chapter 6: Air Quality [APP-042]**, **ES Volume 2, Chapter 11: Landscape and Visual [APP-047]**, **ES Volume 2, Chapter 12: Noise and Vibration [APP-048]** and **ES Volume 2, Chapter**

Ref number(s)	Theme	Matter raised	Response
			14: Transport and Access [APP-050]. This approach is in accordance with the Scoping Opinion response received from the Planning Inspectorate (see **ES Volume 4, Appendix 5.2: Scoping Opinion [APP-098]**). Therefore, the Applicant considers that the effect on human health as a result of the Proposed Development has been adequately assessed within the documents stated.
RR-027	BESS	Concern regarding loss of property value associated with living in proximity to BESS	There is no empirical evidence to suggest that solar farms have a long-term impact on property values
RR-027	BESS	Concern regarding risk of terrorism attack associated with BESS	The Planning Inspectorate has agreed that major accidents and disasters can be scoped out of the assessment, on the basis that the ES should clearly signpost where these impacts are assessed in other relevant chapters and documents and where any relevant mitigation measures are secured, if required. Any relevant mitigation measures are detailed in and secured by the **Outline Construction Environmental Management Plan (CEMP) [EN010157/APP/7.2 Revision 2]**, **Outline Operational Environmental Management Plan (OEMP) [EN010157/APP/7.3 Revision 2]**, and the **Outline BSMP [EN010157/APP/7.6 Revision 2]**. The production of the final version of these is secured via Requirements 4, 14 and 8 of Schedule 2 of the **Draft DCO [EN010157/APP/3.1 Revision 4].** The final versions of

Ref number(s)	Theme	Matter raised	Response
			these plans must be substantially in accordance with the outline versions. Additionally, security measures shall be put in place around the Site which will minimise the risk of a terrorist attack. Measures include: 2m high perimeter security fencing around operational areas of the Proposed Development; pole-mounted infrared security detection cameras installed on poles a maximum of 3m high around the Site perimeter; infrared sensory triggered security lighting around key electrical infrastructure. Further details on security measures for the Proposed Development are set out in **ES Volume 1, Chapter 3: Proposed Development Description [APP-039].**
RR-042	BESS	Statement that the battery storage is too close to Carr House Farm	The proximity of people and residential properties to the Proposed Development has been assessed within **ES Volume 2, Chapter 11: Landscape and Visual [APP-047], ES Volume 2, Chapter 12: Noise and Vibration [APP-048]** and **ES Volume 2, Chapter 13 Population [APP-049]**. The layout design of the Proposed Development considered the proximity of BESS to residential properties, and embedded mitigation ensures that the Proposed Development design will incorporate a minimum offset distance of 50m from residential properties from solar PV modules and other infrastructure. This is secured through the **Works Plans [PDA-004].**

Ref number(s)	Theme	Matter raised	Response
RR-041	BESS	Concern that the number of BESS units has increased from original plan in Land Area B	As the design of the Proposed Development has evolved, further environmental assessments have been undertaken to ensure that any potential adverse environmental effects are mitigated against. The increase in the number of BESS units is not anticipated to result in any new adverse environmental effects. The **ES** has considered a worst-case assessment in terms of BESS locations.
RR-041	BESS	Concern that the B8 BESS unit has relocated closer to Carr House Farm / Concern regarding danger to Carr House Farm due to BESS	As the design of the Proposed Development has evolved, further environmental assessments have been undertaken to ensure that any potential environmental effects are mitigated against. The movement of BESS units is not anticipated to result in any new adverse environmental effects. The **ES** has considered a worst-case assessment in terms of BESS locations. The layout design of the Proposed Development considered the proximity of BESS to residential properties, and embedded mitigation ensures that the Proposed Development design will incorporate a minimum offset distance of 50m from residential properties from solar PV modules and other infrastructure. This is secured through the **Works Plans [PDA-004].** An **Outline BSMP [EN010157/APP/7.6 Revision 2]** has been produced which identifies the key standards, guidelines, and principles the Applicant will adhere to during the detailed design and operation of the BESS within the Proposed Development. This **Outline BSMP [EN010157/APP/7.6 Revision 2]** has been

Ref number(s)	Theme	Matter raised	Response
			produced in order to respond to the risks and concerns around the potential for a battery fire event at a BESS. The final Battery Safety Management Plan is secured via Requirement 8 of the **Draft DCO [EN010157/APP/3.1 Revision 4]** and must be substantially in accordance with the **Outline BSMP [EN010157/APP/7.6 Revision 2]**. Relevant works will not begin until this plan is approved by the local planning authority, following consultation with the Humberside Fire and Rescue Service.
RR-041	BESS	Concern regarding danger to footpath users due to BESS	An **Outline BSMP [EN010157/APP/7.6 Revision 2]** has been produced which identifies the key standards, guidelines, and principles the Applicant will adhere to during the detailed design and operation of the BESS for the Proposed Development. This **Outline BSMP [EN010157/APP/7.6 Revision 2]** has been produced in order to respond to the risks and concerns around the potential for a battery fire event at a BESS, and it is considered that this document adequately mitigates any danger to the surrounding environment (including footpath users) in the event of an incident occurring that relates to the BESS. The Battery Safety Management Plan is secured via Requirement 8 of the **Draft DCO [EN010157/APP/3.1 Revision 4]** and must be substantially in accordance with the **Outline BSMP [EN010157/APP/7.6 Revision 2]**. Relevant works will not begin until this plan is approved by the local planning authority,

Ref number(s)	Theme	Matter raised	Response
			following consultation with the Humberside Fire and Rescue Service.
RR-026	BESS	Concern regarding safety risks associated with BESS	The Applicant has consulted the Health and Safety Executive on the Proposed Development. The construction, operation and decommissioning of the Proposed Development are not considered to have a risk of major accidents or disasters that could affect existing or future receptors, which are not considered through existing design mitigation and regulatory regimes. By implementing recognised and approved safety legislation and regulation, no significant effects in relation to major accidents and disasters are anticipated during the construction, operation and decommissioning phases. An **Outline BSMP [EN010157/APP/7.6 Revision 2]** has been produced which identifies the key standards, guidelines, and principles the Applicant will adhere to during the detailed design and operation of the BESS within the Proposed Development. The Battery Safety Management Plan is secured via Requirement 8 of the **Draft DCO [EN010157/APP/3.1 Revision 4]** and must be substantially in accordance with the **Outline BSMP [EN010157/APP/7.6 Revision 2]**. Relevant works will not begin until this plan is approved by the local planning authority, following consultation with the Humberside Fire and Rescue Service.

Ref number(s)	Theme	Matter raised	Response
RR-026	BESS	Concern regarding environmental impact of BESS	The potential environmental impacts of a BESS have been fully assessed in **ES Volume 2, Chapter 7: Biodiversity [EN010157/APP/6.2 Revision 2], ES Volume 2, Chapter 8: Climate [APP-044], ES Volume 2, Chapter 9: Cultural Heritage [EN010157/APP/6.2 Revision 2], ES Volume 2, Chapter 10: Land Soil and Groundwater [APP-046], ES Volume 2, Chapter 11: Landscape and Visual [APP-047], ES Volume 2, Chapter 12: Noise and Vibration [APP-048]** and **ES Volume 2, Chapter 13: Population [APP-049]** appropriate mitigation described within these chapters. An **Outline BSMP [EN010157/APP/7.6 Revision 2]** has also been produced which identifies the key standards, guidelines, and principles the Applicant will adhere to during the detailed design and operation of the BESS within the Proposed Development. This **Outline BSMP [EN010157/APP/7.6 Revision 2]** has been produced in order to respond to the risks and concerns around the potential for a battery fire event at a BESS. The Battery Safety Management Plan is secured via Requirement 8 of the **Draft DCO [EN010157/APP/3.1 Revision 4]** and must be substantially in accordance with the **Outline BSMP [EN010157/APP/7.6 Revision 2]**. Relevant works will not begin until this plan is approved by the local planning authority, following consultation with the Humberside Fire and Rescue Service.

Ref number(s)	Theme	Matter raised	Response
RR-026	BESS	Concern regarding impact on wildlife associated with BESS	The impact on biodiversity has been fully assessed within **ES Volume 2, Chapter 7: Biodiversity [EN010157/APP/6.2 Revision 2]** and mitigation described within this chapter. This mitigation includes a buffer of 15m from ancient woodland, and 10m from other woodlands, hedgerows, and watercourses. There would also be a 3m high acoustic barrier installed around the BESS. With these mitigation measures in place, there is not predicted to be a significant adverse environmental effect on ecological receptors. An **Outline BSMP [EN010157/APP/7.6 Revision 2]** has also been produced which identifies the key standards, guidelines, and principles the Applicant will adhere to during the detailed design and operation of the BESS within the Proposed Development. This **Outline BSMP [EN010157/APP/7.6 Revision 2]** has been produced in order to respond to the risks and concerns around the potential for a battery fire event at a BESS. The final Battery Safety Management Plan is secured via Requirement 8 of the **Draft DCO [EN010157/APP/3.1 Revision 4]** and must be substantially in accordance with the **Outline BSMP [EN010157/APP/7.6 Revision 2]**. Relevant works will not begin until this plan is approved by the local planning authority, following consultation with the Humberside Fire and Rescue Service.

Ref number(s)	Theme	Matter raised	Response
RR-033	BESS	Statement that the proposals do not satisfy guidelines for BESS, particularly in relation to fire water storage and access arrangements	There are a number of design standards relevant to BESS design and safety which will be complied with where appropriate. The standards are listed in Section 7 and Appendix A Table 1 of the **Outline BSMP [EN010157/APP/7.6 Revision 2].** The BESS will be dispersed across each of the land areas rather than being located centrally and therefore the guidance should be applied in a proportionate manner. Access to the BESS compounds is at various points as seen in **ES Volume 3, Figure 3.5: Indicative Construction Layout Plan [APP-059].** A separation of 25-50m is maintained between all BESS units and site access points that lie within the direction of the prevailing wind. Modelling indicates that this is the optimal location for the FRS to be able to clearly view and assess the conditions. This would also ensure that FRS vehicles are not blocking adjacent highways when tackling any potential issue. The water supplies requirement set out in the NFCC Planning Guidance when applied to a de-centralised DC-coupled battery arrangement is not proportionate. No water storage is proposed on site as sufficient water can be carried by FRS appliances for a DC-coupled battery site for boundary cooling purposes. The **Outline BSMP [EN010157/APP/7.6 Revision 2]** Appendix A: Table 1 summarises the relevant guidance from the National Fire Chiefs Council in relation to Grid Scale BESS and sets out how the Proposed Development responds to the

Ref number(s)	Theme	Matter raised	Response
			recommendations raised. Humberside Fire and Rescue Service have been consulted on this approach and will continue to be involved in the development of the plan. The Battery Safety Management Plan is secured via Requirement 8 of the **Draft DCO [EN010157/APP/3.1 Revision 4]** and must be substantially in accordance with the **Outline BSMP [EN010157/APP/7.6 Revision 2]**. Relevant works will not begin until this plan is approved by the local planning authority, following consultation with the Humberside Fire and Rescue Service.
RR-049, RR-039	Communities	Concern regarding negative impact on communities	As part of the DCO process the Applicant carried out an Environmental Impact Assessment (EIA) to assess the likely significant effects (both positive and negative) the Proposed Development could have on the environment and local communities. **ES Volume 2, Chapters 6,8, 10 to 15 [APP-042, APP-044, APP-046, APP-047 to APP-051] and Chapter 7 and Chapter 9 [EN010157/APP/6.2 Revision 2]** provide details on a wide range of topics such as landscape and visual, biodiversity, cultural heritage, flood risk, traffic, noise and other considerations. In addition, in line with the Applicant's corporate commitment to fostering community development, the Applicant is looking to establish a Community Benefit Fund to support the wellbeing of the local community, through a range of initiatives.

Ref number(s)	Theme	Matter raised	Response
RR-051	Communities	Concern regarding the impact on houses and villages	As part of the DCO process the Applicant carried out an Environmental Impact Assessment (EIA) to assess the likely significant effects (both positive and negative) the Proposed Development could have on the environment and local communities **ES Volume 2, Chapters 6,8, 10 to 15 [APP-042, APP-044, APP-046, APP-047 to APP-051] and Chapter 7 and Chapter 9 [EN010157/APP/6.2 Revision 2]** provide details on a wide range of topics such as landscape and visual, biodiversity, cultural heritage, flood risk, traffic, noise and other considerations. **ES Volume 2, Chapter 11: Landscape and Visual [APP-047]** considers the landscape character of the site and its relationship with nearby communities to identify the potential effects on the local landscape and visual amenity. The maximum height of the solar panels is three metres, which is the equivalent of a well-maintained hedgerow. By distributing the Proposed Development across several separate land areas, rather than one large site, the Applicant can more effectively minimise the landscape and visual impact of the Proposed Development. **ES Volume 4, Commitments Register [EN010157/APP/6.4 Revision 2]** provides a summary of the mitigation for the Proposed Development and how this will be monitored. The potential impacts from construction traffic associated with the Proposed Development have also been considered in **ES Volume 2, Chapter 14: Transport and Access [APP-050].**

Ref number(s)	Theme	Matter raised	Response
			Relevant mitigation measures are outlined in the **Outline CEMP [EN010157/APP/7.2 Revision 2], Outline OEMP [EN010157/APP/7.3 Revision 2], Outline Decommissioning Environmental Management Plan (DEMP) [EN010157/APP/7.4 Revision 2], Outline Rights of Way and Access Management Plan [EN010157/APP/7.9 Revision 2]** and **Outline Construction Traffic Management Plan (CTMP) [EN010157/APP/7.7 Revision 2]**. The final version of these plans are secured via Requirements 4, 14, 15, 10 and 5 of Schedule 2 of the **Draft DCO [EN010157/APP/3.1 Revision 4]** and must be substantially in accordance with the outline versions.
RR-039	Communities	Concern regarding the impact on recreation such as PRoWs	The impact on Public Rights of Way (PRoW) and bridle routes has been considered as part of the design development. The DCO Application was supported by an **Outline Rights of Way and Access Management Plan [EN010157/APP/7.9 Revision 2]** which set out details on how PRoW will be managed to ensure user safety during the construction, operation and decommissioning of the Proposed Development. It details that temporary closures/restrictions and safety measures will be implemented as a priority, so that local communities are still able to safely enjoy the enhanced connectivity routes from the start of construction. The production of the final version of this plan is secured by Requirement 10 of the **Draft DCO [EN010157/APP/3.1 Revision 4]** and will be subject to approval from the local planning authority.

Ref number(s)	Theme	Matter raised	Response
			A network of new permissive paths will also be implemented as part of the Proposed Development's design, which will be available during the operational phase. These are detailed in **ES Volume 3, Figure 3.4: Indicative Environmental Masterplan [APP-058]** and are secured by the **Outline LEMP [EN010157/APP/7.5 Revision 3]**.
RR-028	Communities	Concern that the Proposed Development surrounds Tickton	**ES Volume 2, Chapter 11: Landscape and Visual [APP-047]** considers the landscape character of the Site and its relationship with nearby communities to identify the potential effects on the local landscape and visual amenity. Zones of Theoretical Visibility (i.e. a computer-generated tool to identify the likely extent of visibility of a development) have been produced for the Proposed Development. As shown in **ES Volume 3, Figure 11.2: Solar PV Modules ZTV [APP-073],** the theoretical visibility of the solar PV development extends up to the built form on the southern and eastern edge of Tickton. It also demonstrates the absence of any visibility within the settlement of Tickton. Site work and assessments have established that vegetation around the southern boundary of the village, combined with the additional layers of intervening hedgerows and woodland belts, would screen views of the Proposed Development from Tickton. During site survey work it was not possible to find a publicly accessible location with existing views towards the Site, including from PRoW Tickton Footpath no .4 along the south-eastern boundary of Tickton. It has therefore been assessed that there would be no view of any element of

Ref number(s)	Theme	Matter raised	Response
			the Proposed Development (with the exception of traffic to/ from the Site), during construction (and decommissioning), operation and maintenance from Tickton. It is acknowledged, however, that there may be glimpsed and filtered views of the northern extents of Land Areas D and E from a small number of upper floor rear windows of private homes, on the southern and eastern periphery of the village at distances of greater than 1.2 km which would be negligible in scale at most.
RR-028	Communities	Concern that the Proposed Development surrounds Weel	**ES Volume 2, Chapter 11: Landscape and Visual [APP-047]** considers the landscape character of the Site and its relationship with nearby communities to identify the potential effects on the local landscape and visual amenity. Zones of Theoretical Visibility (i.e. a computer-generated tool to identify the likely extent of visibility of a development) have been produced for the Proposed Development. As shown in **ES Volume 3, Figure 11.2: Solar PV Modules ZTV [APP-073]** and **ES Volume 3, Figure 11.3: Project Substations ZTV: [APP-074],** there would be theoretical visibility of separate elements of the Proposed Development from the settlement of Weel. It should be noted that there are no publicly accessible locations within the village itself with possible views towards solar PV infrastructure, with all views screened by built form and/or mature vegetation. The view from Viewpoint 20 (located on Tickton footpath no.12, 100 m south of the village – as shown in the above figures) is the most open possible, towards Land Area E, within the immediate vicinity of the village. Within the village of Weel (including

Ref number(s)	Theme	Matter raised	Response
			Tickton Footpath no.8) the Proposed Development would generally not be visible with the exception of occasional and heavily filtered views from a very small number of upper floor windows of private dwellings. From Tickton footpath no.7 to the immediate north of Weel there would be more open views across the flat landscape of solar PV development in Field E15, however the views would be limited to gaps in the existing hedgerow adjacent to the footpath. The views from Tickton footpath no.12 to the south of Weel are as per Viewpoint 20. A new hedgerow is proposed to the west of solar PV modules within Field E17; in addition, the current maintenance regime of the existing hedgerows around Fields E13-E17 would be relaxed with the hedgerows allowed to reach a height of 3.5m. Any gaps in these existing hedgerows would also be infilled to provide screening. As detailed in **ES Volume 2, Chapter 11: Landscape and Visual [APP-047]**, visual impacts of the Proposed Development on the village of Weel are anticipated to be Not Significant.
RR-048	Communities	Statement that local residents need to be considered	The Applicant has undertaken three rounds of consultation prior to the submission of the DCO Application. Over 100 responses were received from the local community during the non-statutory consultation held in Autumn 2023, all of which have been considered and responded to as part of our non-statutory consultation report, published on the project website in January 2024 and found in **Appendix A-2 of the Consultation Report Appendices [APP-027].** The statutory consultation was held in

Ref number(s)	Theme	Matter raised	Response
			Spring 2024 and received over 150 responses. A targeted consultation was held in Autumn 2024 on a number of revisions to the draft Order Limits which required additional land for the construction and/or operation of the Proposed Development. All responses to these consultations have been considered. The **Consultation Report [APP-026]** was submitted as part of the DCO Application. This report details all the activity the Applicant undertook as part of its non-statutory, statutory and targeted consultation periods, the feedback received and how the Applicant had regard for that feedback.
RR-049	Communities	Statement that solar farms should not be located near villages	The site selection process has been extensive, guided by the need to identify suitable land within a reasonable proximity to the National Grid Creyke Beck Substation. During the land area selection process, our team of experts has carefully considered various parameters, including: • Alternative brownfield options – there are no suitable alternative sites for delivery on brownfield land. • Topography and field patterns – the land within the Site is generally flat, low-lying areas which are screened by existing hedgerows. • Proximity to environmental designations – the Site is not located within places identified by the government as having

Ref number(s)	Theme	Matter raised	Response
			special landscape and ecological value, such as National Landscapes. • Proximity to settlements – the Site is situated in a rural area with only a small number of individual properties and settlements within 1km of the Site. • Agricultural land classification – desk-top data identified that the vast majority of the Site is comprised of moderate to good grade agricultural land. • Accessibility for construction and maintenance – the site can be accessed from the A165 and other existing roads. Details on the iterative design process are provided in **ES Volume 1, Chapter 4: Alternatives and Design Iteration [APP-040]** and **Appendix 2: Site Selection Assessment to the Planning Statement [APP-147].** **ES Volume 2, Chapter 11: Landscape and Visual [APP-047]** considers the landscape character of the Site and its relationship with nearby communities to identify the potential effects on the local landscape and visual amenity.
RR-04, RR-045, RR-048	Communities	Statement that the Proposed Development will not benefit community / Statement that	The Applicant has produced a **Design Approach Document [APP-149]** which outlines the approach taken to the design development of the Proposed Development, including how the design has been shaped and influenced by the local landscape,

Ref number(s)	Theme	Matter raised	Response
		there will be no benefit to local people	and with local communities and their enjoyment of the local area in mind. In line with the Applicant's corporate commitment to fostering community development, the Applicant is looking to establish a Community Benefit Fund of up to £4.2 million over the lifetime of the Proposed Development. As set out in the **Planning Statement [APP-147],** the Proposed Development would also provide the below benefits: • New wildflower meadows and grassland areas across the Site, to support local ecology • Habitat creation, including new bird and bat boxes • A network of new permissive paths, helping to improve public access to the Site • Creation of new information boards on the heritage of the local area, in the vicinity of and to allow access to Scheduled Monuments NHLE 1007843 (Site of Meaux Cistercian Abbey) and NHLE 1015305 (Meaux duck decoy, 420 m southwest of Meaux Decoy Farm). • Up to 19.5km of new native hedgerows, 10,240m^2 of structural woodland and 30,363 m^2 of scrub planting to further improve visual screening and habitat creation.

Ref number(s)	Theme	Matter raised	Response
RR-049, RR-027, RR-034, RR-030, RR-026	Communities	Concern regarding the impact on farmers	Solar farms provide valuable income for farmers, as the land can still be used for grazing and can support UK farmers to continue food production on other parts of their land. The independent National Food Strategy Review shows that solar farms do not in any way present a risk to the UK's food security. Indeed, the reverse is true: the solar industry is working closely with Britain's farmers to reduce their energy costs and improve the sustainability of their operations. Further, where a solar farm is installed on land which has been intensively farmed, it enables the ground underneath to recover, while providing income for the farming business. Solar farms also help regenerate soil quality and so are helping to ensure the continued availability of high-quality agricultural acreage for future generations.
RR-049, RR-034	Communities	Concern regarding the impact on walking activities	The DCO Application is supported by an **Outline Rights of Way and Access Management Plan [EN010157/APP/7.9 Revision 2]** which set out details on how PRoW and permissive paths will be managed to ensure users safety during the construction, operation and decommissioning of the Proposed Development. It details that the diversions and safety measures will be implemented as a priority, so that local communities are still able to safely enjoy the enhanced connectivity routes from the start of construction. The production of the final plan is secured by Requirement 10 of the **Draft DCO [EN010157/APP/3.1 Revision 4]** which must be substantially in accordance with the **Outline Rights of Way and**

Ref number(s)	Theme	Matter raised	Response
			Access Management Plan [EN010157/APP/7.9 Revision 2] and will be subject to local planning authority approval.
RR-049, RR-039	Communities	Concern regarding the loss of peaceful surroundings	**ES Volume 2, Chapter 11: Landscape and Visual [APP-047]** considers the landscape character of the Site and its relationship with nearby communities to identify the potential effects on the local landscape and visual amenity. The maximum height of the solar panels is 3m, which is the equivalent of a well-maintained hedgerow. By distributing the Proposed Development across several separate land areas, rather than one large site, the Applicant can more effectively minimise the landscape and visual impact of the Proposed Development. This parameter is secured by the **Design Parameters Document [EN010157/APP/5.8 Revision 2]** via Requirement 3 of the **Draft DCO [EN010157/APP/3.1 Revision 4].** An assessment of noise effects during the operational phase is provided in **ES Volume 2, Chapter 12: Noise and Vibration [APP-048]**. This includes the impacts associated with noise from the inverters, BESS and panels. The assessment concludes that the residual effects from noise during the operational phase is not significant following adoption of mitigation measures as outlined in the **Commitments Register [EN010157/APP/6.4 Revision 2]**, and additional mitigation measures, such as plant specifications and incorporation of noise.

Ref number(s)	Theme	Matter raised	Response
			Additionally, Requirement 12 of the **Draft DCO [EN010157/APP/3.1 Revision 4]** secures that prior to operation, an operational noise assessment, containing details of mitigation must be submitted to and approved by the relevant planning authority. The mitigation measures must be implemented as approved and would be designed to ensure that appropriate threshold noise limits, as agreed with East Riding of Yorkshire Council would be complied with.
RR-029	Communities	Concern regarding impact on rural communities	The impact on the local community has been assessed within **ES Volume 2, Chapter 13: Population [APP-049]**. There are not predicted to be any significant effects on population as a result of the Proposed Development.
RR-049	Communities	Concern that the Proposed Development will surround farm	**ES Volume 2, Chapter 11: Landscape and Visual [APP-047]** provides an assessment of the effects of the Proposed Development on visual amenity, including from selected residential properties, and sets out a suite of measures to mitigate adverse effects. A residential visual amenity assessment has also been undertaken for properties that could be impacted by the Proposed Development. This assessment considers not only the view from within the property but also its primary curtilage (i.e. garden space) and the impact on views when immediately approaching and leaving the property. The detailed findings are presented in **ES Volume 4, Appendix 11.5: Residential Visual Amenity Assessment [APP-132].**

Ref number(s)	Theme	Matter raised	Response
RR-027	Communities	Concern regarding impact on regional identity	The impact on the local community has been assessed within **ES Volume 2, Chapter 13: Population [APP-049]**. Regional identity refers to the shared sense of belonging, culture, and history among people living in a specific geographic region. The Proposed Development has been designed to promote positive social interactions, ensuring safe and accessible communities and supporting healthy lifestyles through the retention of existing PRoW and creation of a network of new proposed permissive paths. These proposed permissive paths have been designed to retain and enhance recreational connectivity across the Site.
RR-027, RR-034	Communities	Concern regarding the loss of farming heritage	The impact on the local community has been assessed within **ES Volume 2, Chapter 13: Population [APP-049]**, and heritage features such as scheduled monuments in close proximity to local farms has been assessed in **ES Volume 2, Chapter 9: Cultural Heritage [EN010157/APP/6.2 Revision 2].** There are not predicted to be any significant effects on population or heritage features as a result of the Proposed Development.
RR-027	Communities	Concern regarding the proximity of the Proposed Development to residential areas	A series of embedded mitigation measures relevant to each environmental factor have been included within the Proposed Developments' design which are detailed in **ES Volume 2, Chapters 6,8,10 to 15 [APP-042, APP-044, APP-046 to APP-051] and Chapter 7 and Chapter 9 [EN010157/APP/6.2**

Ref number(s)	Theme	Matter raised	Response
			Revision 2]. A number of these measures have been designed to provide a buffer and/or help screen the Proposed Development from residential areas. **ES Volume 2, Chapters 6,8,10 to 14 [APP-042, APP-044, APP-046 to APP-050] and Chapter 7 and Chapter 9 [EN010157/APP/6.2 Revision 2]** provides an assessment of the effects of the Proposed Development on visual amenity, including from selected residential properties, and sets out a suite of measures to mitigate adverse effects. A residential visual amenity assessment has also been undertaken for properties that could be impacted by the Proposed Development. This assessment considers not only the view from within the property but also its primary curtilage (i.e. garden space) and the impact on views when immediately approaching and leaving the property. The detailed findings are presented in **ES Volume 4, Appendix 11.5: Residential Visual Amenity Assessment [APP-132]**.
RR-042, RR-035, RR-039	Communities	Statement that Land Area B surrounds Carr House Farm / Concern that the Proposed Development surrounds Carr House Farm	During design development the panel areas surround Carr Farm have been reduced. Panel areas were reduced to the east and south of Carr Farm for Statutory Consultation following feedback the non-statutory consultation. In addition, **correction 1 in The Applicants request to submit changes to the application [PDA-001]** includes removing a section of panels that are adjacent to Carr House Farm to the north. Documentation associated with this change has been submitted at Procedural Deadline A. Correction 1 was made as prior to the submission of

Ref number(s)	Theme	Matter raised	Response
			the DCO Application, the Applicant had agreed with the owner of a nearby residential property, Carr House Farm, to remove this section of panels in order to further reduce the visual impacts of the panels on their property. However, this was not reflected in the application documents prior to submission of the DCO Application. This area is proposed to be left for environmental mitigation following the removal of the panels. The Applicant acknowledges the proximity of the Proposed Development to Carr House Farm. **ES Volume 2, Chapter 11: Landscape and Visual [APP-047]** provides an assessment of the effects of the Proposed Development on visual amenity, including from selected residential properties, and sets out a suite of measures to mitigate adverse effects. A residential visual amenity assessment has also been undertaken for properties that could be impacted by the Proposed Development. This assessment considers not only the view from within the property but also its primary curtilage (i.e. garden space) and the impact on views when immediately approaching and leaving the property. The detailed findings are presented in **ES Volume 4, Appendix 11.5: Residential Visual Amenity Assessment [APP-132].** Infill/New species-rich hedgerow planting, with occasional trees, and mixed scrub planting are proposed along field boundaries in the vicinity of Carr House Farm to soften views and provide screening, as described in **ES Volume 2, Chapter 11: Landscape and Visual [APP-047]** and

Ref number(s)	Theme	Matter raised	Response
			illustrated on **ES Volume 3, Figure 3.4: Indicative Environmental Masterplan [APP-058].** Environmental assessments have been undertaken to ensure that any potential effects on residential properties are assessed in the following documents: **ES Volume 2, Chapter 11: Landscape and Visual [APP-047], ES Volume 2, Chapter 12: Noise and Vibration [APP-048]** and **ES Volume 2, Chapter 13: Population [APP-049].**
RR-042	Communities	Statement that the inverters are too close to Carr House Farm	As the design of the Proposed Development has evolved, further environmental assessments have been undertaken to ensure that any potential effects on Carr House Farm as a result of inverters are assessed and mitigated against. This assessment is set out in the following documents: **ES Volume 2, Chapter 11: Landscape and Visual [APP-047], ES Volume 2, Chapter 12: Noise and Vibration [APP-048], and ES Volume 2, Chapter 13: Population [APP-049].** The layout design of the Proposed Development considered the proximity of inverters to residential properties, and embedded mitigation ensures that the Proposed Development design will incorporate a minimum offset distance of 50m from residential properties from solar PV modules and other infrastructure. This is secured through the **Works Plans [PDA-004].**
RR-034	Communities	Concern regarding impact on day-to-day life	The impact on the local community has been assessed within **ES Volume 2, Chapter 13: Population [APP-049]**. There are

Ref number(s)	Theme	Matter raised	Response
			not predicted to be any significant effects on population as a result of the Proposed Development. An **Outline CEMP [EN010157/APP/7.2 Revision 2]** has been developed as part of the DCO Application to outline how construction activities will be managed throughout the construction process. The **Outline CEMP [EN010157/APP/7.2 Revision 2]** sets out strategies and measures for managing construction activities, including stakeholder engagement, site management, environmental considerations, community impact, health and safety, and monitoring and compliance. The **Outline CEMP [EN010157/APP/7.2 Revision 2]** ensures responsible construction practices while minimising disruptions and environmental impacts. A Construction Environmental Management Plan will be produced which will be substantially in accordance with the **Outline CEMP [EN010157/APP/7.2 Revision 2]**. This is secured via Requirement 4 of the **Draft DCO [EN010157/APP/3.1 Revision 4]**. An **Outline OEMP [APP-154]** has been developed as part of the DCO Application to outline how activities will be managed throughout the operational lifetime of the Proposed Development. The **Outline OEMP [APP-154]** sets out strategies and measures for managing operational activities, including stakeholder engagement, site management, environmental considerations, community impact, health and safety, and monitoring and compliance.

Ref number(s)	Theme	Matter raised	Response
RR-034	Communities	Concern regarding impact on horse riders / Concern regarding the impact on exercising local horses	The assessment of the Proposed Development on Pedestrian, Horse Riding and Cyclist amenity and Accidents & Safety is detailed in **ES Volume 2, Chapter 14: Transport and Access [APP-050].** All impacts are deemed to be not significant. **ES Volume 2, Chapter 13: Population [APP-049]** assessed the effects of the Proposed Development on the local population throughout the lifetime of the Proposed Development (construction, operation (including maintenance), and decommissioning). As detailed in **ES Volume 2, Chapter 13: Population [APP-049]** during the construction phase of the Proposed Development, three public footpaths (RISTF01, RISTF02 and WAWNF01) run through the Order Limits and may be crossed by construction vehicle tracks. However, no temporary diversions, closures or restrictions will be required for these three footpaths. 13 public footpaths and bridleways (BEVEF23, SKIDB07, SKIDF10, SKIDF11, SKIDF12, SKIDF17, TICKB05, TICKF09, TICKF12, WOODF04, WOODF09, WOODF12, WOODF18) run through the grid connection cable route and cross construction vehicle routes. There are no suitable routes for temporary diversions and therefore any temporary closures or restrictions will be required for a short duration to enable construction works but aim to remain open with control measures in place as much as is safely possible. There is likely to be a direct, temporary, short-term slight adverse residual effect on users of PRoW following the implementation of

Ref number(s)	Theme	Matter raised	Response
			additional mitigation measures, which is considered to be not significant for walkers, cyclists, and horse riders. All existing PRoW will be retained during the operation (including maintenance) of the Proposed Development, as the Proposed Development design incorporates a minimum offset distance of 10m from all PRoW, where reasonably practicable. The Applicant is proposing to provide a network of new of permissive paths which will be available during the operation (including maintenance) phase, details of which can be found in **ES Volume 3, Figure 3.4: Indicative Environmental Masterplan [APP-058]** and set out in the **Outline LEMP [EN010157/APP/7.5 Revision 3]**, which is secured as requirement 9 in Schedule 2 of the **Draft DCO [EN010157/APP/3.1 Revision 4]**. Several of the permissive paths within Land Areas D and E have been identified as accessible to horse riders (see paragraph 3.9.17 in the **Planning Statement [APP-147]**). The introduction of these permissive paths will provide a benefit to horse riders through increased recreational connectivity across the Site.
RR-034	Communities	Concern regarding impact on dog walkers	As part of the design of the Proposed Development, over 12km of new permissive paths will be provided that link in with the existing PRoW network, which will extend existing dog walking routes. Proposed permissive path details can be found in **ES**

Ref number(s)	Theme	Matter raised	Response
			Volume 3, Figure 3.4: Indicative Environmental Masterplan [APP-058].
RR-028	Communities	Concern that the proposed development will surround Routh	Routh was fully assessed within **ES Volume 2, Chapter 11: Landscape and Visual [APP-047]** due to the proximity of the area to the Proposed Development. The village of Routh is 900m north of Field D6 at its closest point to the Proposed Development. Paragraphs 11.9.69- 11.9.73 of **ES Volume 2, Chapter 11: Landscape and Visual [APP-047]** fully consider construction impacts, which are assessed as being minor/negligible adverse and not significant. Paragraphs 11.9.267 - 11.9.272 of **ES Volume 2, Chapter 11: Landscape and Visual [APP-047]** fully considers operational (including maintenance) impacts, which are assessed as being (at both year 1 and year 10 of the operational (including maintenance) phase) as minor/negligible adverse and not significant.
RR-048, RR-045	Communities	Concern regarding increase in bills / Statement that local people will not see any decrease in energy bills	If consented, the Proposed Development would generate approximately 320MW of clean, green, electricity; enough energy to power approximately 136,000 homes every year. This represents a significant contribution to local and national climate commitments, by helping to decarbonise our energy mix, reduce bills and improve the UK's energy security. The actual cost of consumer energy bills is a matter for electricity suppliers and the regulator OFGEM.

Ref number(s)	Theme	Matter raised	Response
RR-048	Communities	Concern regarding long term effects on local people	**ES Volume 2, Chapter 13: Population [APP-049]** assessed the effects of the Proposed Development on the local population throughout the lifetime of the Proposed Development (construction, operation, and decommissioning). There are not anticipated to be any significant effects for population as a result of the Proposed Development.
RR-025	Communities	Statement that inverters should be located away from properties	As the design of the Proposed Development has evolved, further environmental assessments have been undertaken to ensure that any potential effects on residential properties as a result of inverters are assessed and mitigated against in the following documents: **ES Volume 2, Chapter 11: Landscape and Visual [APP-047], ES Volume 2, Chapter 12: Noise and Vibration [APP-048],** and **ES Volume 2, Chapter 13: Population [APP-049].** The Proposed Development design will incorporate a minimum offset distance of 50m from residential properties from solar PV modules and other infrastructure. This is secured by the **Works Plans [PDA-004].**
RR-039	Communities	Statement that the Proposed Development is too intrusive	The potential environmental impacts of the Proposed Development have been fully assessed in **ES Volume 2, Chapter 7: Biodiversity [EN010157/APP/6.2 Revision 2], ES Volume 2, Chapter 8: Climate [APP-044], ES Volume 2, Chapter 9: Cultural Heritage [APP-054], ES Volume 2, Chapter 10: Land Soil and Groundwater [APP-046], ES**

Ref number(s)	Theme	Matter raised	Response
			Volume 2, Chapter 11: Landscape and Visual [APP-047], ES Volume 2, Chapter 12: Noise and Vibration [APP-048], ES Volume 2, Chapter 13: Population [APP-049], and **ES Volume 2, Chapter 14: Transport and Access [APP-050]**, and appropriate mitigation described within these chapters. The **Outline CEMP [EN010157/APP/7.2 Revision 2]** during construction and the **Outline OEMP [APP-154]** during operation (including maintenance) will ensure that additional mitigation measures are implemented during the construction and operation (including maintenance) of the Proposed Development. The final version of these plans are secured via Requirements 4 and 14 of Schedule 2 of the **Draft DCO [EN010157/APP/3.1 Revision 4]** and must be substantially in accordance with the outline versions.
RR-027, RR-044, RR-040, RR-049	Construction	Concern regarding disruption associated with the construction phase / Concern regarding impact on residents during construction phase / Concern regarding environmental impact of installation process	The Applicant has assessed any potential local impacts of construction and proposed measures to mitigate them if necessary. An **Outline CEMP [EN010157/APP/7.2 Revision 2]** has been developed as part of the DCO application to outline how construction activities will be managed throughout the construction process. The **Outline CEMP [EN010157/APP/7.2 Revision 2]** sets out strategies and measures for managing construction activities, including stakeholder engagement, site management, environmental considerations, community impact, health and safety, and monitoring and compliance. The document ensures responsible construction practices while minimising disruptions

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			and environmental impacts. Working hours on-site would be from 07:00 until 19:00 Monday to Friday and 07:00 until 12:00 on Saturday. No working would take place on Sundays or Bank Holidays unless necessary. A Community Liaison Officer will be employed during construction. More details will be provided in the Construction Environmental Management Plan, which must, as set out in Requirement 4 of the **Draft DCO [EN010157/APP/3.1 Revision 4]**, be approved by East Riding of Yorkshire Council prior to construction commencing and will be substantially in accordance with the **Outline CEMP [EN010157/APP/7.2 Revision 2].**
RR-039	Construction	Concern regarding public safety during construction	Safety for local communities, construction workers and local wildlife is a key priority for the Applicant during the construction, operation and decommissioning of the Proposed Development. An **Outline CEMP [EN010157/APP/7.2 Revision 2]** has been developed as part of the DCO Application to outline how construction activities will be managed throughout the construction process. The **Outline CEMP [EN010157/APP/7.2 Revision 2]** sets out strategies and measures for managing construction activities, including stakeholder engagement, site management, environmental considerations, community impact, health and safety, and monitoring and compliance. The **Outline CEMP [EN010157/APP/7.2 Revision 2]** ensures responsible construction practices while minimising disruptions and environmental impacts. A Construction Environmental Management Plan will be produced which will be substantially in

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			accordance with the **Outline CEMP [EN010157/APP/7.2 Revision 2]** and subject to approval by the local planning authority. This is secured via Requirement 4 of the **Draft DCO [EN010157/APP/3.1 Revision 4].**
RR-027	Construction	Concern regarding safety due to dust and debris associated with the construction phase	Construction dust has been assessed in **ES Volume 2, Chapter 6: Air Quality [APP-042]**. An **Outline CEMP [EN010157/APP/7.2 Revision 2]** has been developed as part of the DCO Application to outline how construction activities will be managed throughout the construction process. The **Outline CEMP [EN010157/APP/7.2 Revision 2]** sets out strategies and measures for managing construction activities, including stakeholder engagement, site management, environmental considerations, community impact, health and safety, and monitoring and compliance. The document ensures responsible construction practices while minimising disruptions and environmental impacts. Working hours on-site would be from 07:00 until 19:00 Monday to Friday and 07:00 until 12:00 on Saturday. No working would take place on Sundays or Bank Holidays unless necessary. A Community Liaison Officer will be employed during construction. More details will be provided in the detailed Construction Environmental Management Plan, which, as secured in Requirement 4 of the **Draft DCO [EN010157/APP/3.1 Revision 4],** must be approved by East Riding of Yorkshire Council prior to construction commencing and will be substantially in

Ref number(s)	Theme	Matter raised	Response
			accordance with the **Outline CEMP [EN010157/APP/7.2 Revision 2].**
RR-027, RR-025	Construction	Concern regarding the timescales for the construction phase	Should the DCO be granted consent in early 2026, it is anticipated that construction would take 24 months and that the Proposed Development would be ready to connect to the grid in 2028. The Proposed Development would be built in phases. The indicative construction phases are as follows: • Phase 1: Land Area B; • Phase 2: Land Areas B & C; • Phase 3: Land Areas C & D and Grid connection cable route; • Phase 4: Land Areas D & E and Grid connection cable route; • Phase 5: Land Areas E & F and Grid connection cable route; and • Phase 6: Land Area F.
RR-025	Construction	Request for construction to take place at socially acceptable hours	Working hours on-site would be from 07:00 until 19:00 Monday to Friday and 07:00 until 12:00 on Saturday. No working would take place on Sundays or Bank Holidays unless necessary. The construction working hours are set out in the **Outline CEMP [EN010157/APP/7.2 Revision 2].** The detailed Construction Environmental Management Plan is secured via Requirement 4 of the **Draft DCO [EN010157/APP/3.1 Revision 4]** and must be approved by East Riding of Yorkshire Council prior to

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			construction commencing and will be substantially in accordance with the **Outline CEMP [EN010157/APP/7.2 Revision 2]**.
RR-027	Construction	Concern regarding lighting associated with construction phase	Construction stage lighting would be limited to that required for safety reasons and any potential effects would be managed in line with the **Outline CEMP [EN010157/APP/7.2 Revision 2].** Where lighting is required during construction, the use of motion detection or manually operated lighting would be used to avoid constant lighting and the inward/downward direction of light would avoid light spill onto adjacent hedgerows, woodlands, field margins and ditches. Infrared sensor triggered security lighting would be used to minimise impacts on wildlife. The detailed Construction Environmental Management Plan, which, is secured via Requirement 4 of the **Draft DCO [EN010157/APP/3.1 Revision 4]**, must be approved by East Riding of Yorkshire Council prior to construction commencing and will be substantially in accordance with the **Outline CEMP [EN010157/APP/7.2 Revision 2].**
RR-049	Consultation	Statement that the name of the project is not representative	The project name comes from Peartree Hill Plantation which is the name of the woodland block located within Area D, which is roughly the centre point of the site. The use of the term farm is commonly used because it uses large areas of land to harvest sunlight and produce energy, much like traditional farms harvest crops.

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RR-027	Consultation	Statement to involve local residents in decision making for renewable developments	It is government policy for projects that are nationally significant should be determined by the relevant secretary of state via the Development Consent Order process. The community are an important part of the design development and consenting process. The Applicant has undertaken three rounds of consultation. Over 100 responses were received from the local community during the non-statutory consultation held in Autumn 2023, all of which have been considered and responded to as part of our non-statutory consultation report, published in January 2024 and found in **Appendix A-2 of the Consultation Report [APP-027].** The examination period allows the community to remain involved in the application through Relevant Representations, attendance at hearings and written submissions.
RR-042	Consultation	Statement that no contact or compensation has been had in regard to access to Land Area B	The Applicant does not consider that there would be an entitlement to compensation as the access road (Carr Lane) is an adopted public highway. There is no proposal to acquire a right over land held by the Interested Party.
RR-025	Consultation	Statement that a site visit has been requested and not fulfilled	The Applicant is continuing to engage with stakeholders and communities and is committed to attending all relevant site visits where appropriate.

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RR-025, RR-040, RR-039	Consultation	Statement that concerns are not being considered	The Applicant has undertaken three rounds of consultation. Over 100 responses were received from the local community during the non-statutory consultation held in Autumn 2023, all of which have been considered and responded to as part of our non-statutory consultation report, published in January 2024 and found in **Appendix A-2 of the Consultation Report Appendices [APP-027].** The statutory consultation was held in Spring 2024 and received over 150 responses. A targeted consultation was held in Autumn 2024 on a number of revisions to the draft Order Limits which required additional land for the construction and/or operation of the Proposed Development. All responses to these consultations have been considered. The **Consultation Report [APP-026]** was submitted as part of the DCO application. This report details all the activity the Applicant undertook as part of its non-statutory, statutory and targeted consultation periods, the feedback received and how the Applicant had regard for that feedback.
RR-040	Consultation	Statement that the consultation was a sham	The Applicant has a responsibility to fairly present the Proposed Development through the consultation materials. The Applicant created a suite of materials of varying complexity to meet the needs of a range of stakeholders. This included the consultation brochure, non-technical summary of the Preliminary Environmental Information Report (PEIR) and PEIR. In these documents the Applicant explained the project need and

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			benefits, alongside details of the potential impacts and mitigations which may be considered. The **Consultation Report [APP-026]** outlined how the Applicant met the statutory requirements. This was scrutinised as part of the application acceptance process, and the Planning Inspectorate agreed the consultation requirements had been met.
RR-040, RR-039	Consultation	Statement that local knowledge/opinion has not been taken into account	The Applicant has undertaken three rounds of consultation. Over 100 responses were received from the local community during the non-statutory consultation held in Autumn 2023, all of which have been considered and responded to as part of our non-statutory consultation report, published in January 2024 and found in **Appendix A-2 of the Consultation Report Appendices [APP-027].** The statutory consultation was held in Spring 2024 and received over 150 responses. A targeted consultation was held in Autumn 2024 on a number of revisions to the draft Order Limits which required additional land for the construction and/or operation of the Proposed Development. All responses to these consultations have been considered. The **Consultation Report [APP-026]** was submitted as part of the DCO application. This report details all the activity the Applicant undertook as part of its non-statutory, statutory and targeted

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			consultation periods, the feedback received and how the Applicant had regard for that feedback.
RR-039	Consultation	Statement that the consultation was to placate/silence locals	The Applicant has to undertake consultation as part of the DCO process and has taken this duty seriously. The **Consultation Report [APP-026]** outlined how the Applicant met the statutory requirements. This was scrutinised as part of the application acceptance process, and the Planning Inspectorate agreed the consultation requirements had been met.
RR-049, RR-028, RR-048, RR-033, RR-030, RR-051, RR-026, RR-047, RR-045	Cumulative impact	Concern regarding the cumulative impact of the Proposed Development with other proposals in the local area / Question regarding if other projects in area are considered collectively / Statement that there is not adequate evidence that cumulative impacts have been considered	A cumulative effects assessment is available in **ES Volume 2, Chapter 15: Cumulative Effects [APP-051]**. The other developments included in the cumulative assessment have been selected based on identifying major developments that: have the same Zone of Influence as the Proposed Development for at least one environmental factor; have temporal crossover in the proposed dates for construction, operation and/or decommissioning; and are of a scale and nature where a significant effect is likely. The other projects to be included in the cumulative assessment include consented and proposed solar schemes in proximity to the Proposed Development as well as other Nationally Significant Infrastructure Projects, including offshore wind farms which are proposing to connect into the existing National Grid Creyke Beck Substation.
RR-028	Cumulative impacts	Concern regarding renewable projects surrounding Beverley	A cumulative effects assessment has been completed to understand the impacts of the Proposed Development in the

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			context of other developments in the surrounding area (including any other solar schemes). Full details of this assessment are available in **ES Volume 2, Chapter 15: Cumulative Effects [APP-051]**. Furthermore, **ES Volume 4, Appendix 15.2: Cumulative Landscape and Visual Impact Assessment [APP-144]** was produced to provide further detail on each of the other solar farm developments and the potential inter-project cumulative effects anticipated.
RR-045	Cumulative impacts	Statement that there should be a limit for number of developments in an area	The Applicant has no influence over other developments in the area or over the planning process.
RR-027	Decommissioning	Concern that the land would not be returned after lifetime	After the (anticipated) 40-year lifetime the Proposed Development will be decommissioned. The solar farm would be dismantled, and all the structures taken away. A large amount of the apparatus material will be recycled (PV panels, aluminium frames, steel piles and copper wiring). Land within the Order Limits would be returned to its original use as far as possible and practical with areas of established mitigation left in situ where possible and in agreement with the landowner. As part of the DCO application, the Applicant has produced an **Outline DEMP [EN010157/APP/7.4 Revision 2].** The Decommissioning Environmental Management Plan would be substantially in accordance with the **Outline DEMP [EN010157/APP/7.4 Revision 2]** and subject to the approval of the local planning

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			authority at the time of decommissioning. This is secured via requirement 15 of the **Draft DCO [EN010157/APP/3.1 Revision 4].**
RR-027	Decommissioning	Concern regarding the reinstatement of soil	The **Outline Soil Management Plan [EN010157/APP/7.8 Revision 2]** sets out the monitoring and amelioration procedures that would apply to any soil or drainage problems associated with the Proposed Development. Solar farms also help regenerate soil quality and so are helping to ensure the continued availability of high-quality agricultural acreage for future generations. Reinstatement of soil will be monitored by a suitably qualified person and records of operations kept, with photographic evidence. The production of the Soil Management Plan is secured via requirement 6 of the **Draft DCO [EN010157/APP/3.1 Revision 4]** and will be subject to approval by the local planning authority.

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RR-027 RR-048, RR-039	Ecology and Wildlife	Concern regarding habitat fragmentation / Concern regarding impact on habitat / Concern regarding conflict created by loss of wildlife territory / Concern regarding death and diseases in wildlife caused by loss of habitat	The Proposed Development has been designed sensitively so that existing wildlife and habitats are retained and enhanced where possible. The impact on wildlife has been fully assessed within **ES Volume 2, Chapter 7: Biodiversity [EN010157/APP/6.2 Revision 2]** and mitigation described within this chapter. This mitigation includes a buffer of 15m from ancient woodland, and 10m from other woodlands hedgerows and watercourses which will allow continue to allow species to move across the Proposed Development, in addition 116ha of open flower rich grassland will be created maintaining foraging and breeding habitat for bat and bird species which together will maintain habitat connectivity across the landscape. Furthermore, fencing will not be dug into the ground to allow species to push through into the solar PV areas and where appropriate badger gates will allow free movement through the proposed fencing. The proposed new habitat creation and enhancement provided is expected to have long-term, beneficial impacts on the area, with at least a 10% gain in biodiversity habitat units. More information on the assessment of the impacts on biodiversity can be found in **ES Volume 2, Chapter 7: Biodiversity [EN010157/APP/6.2 Revision 2].**
RR-027, RR-032, RR-049, RR-048,	Ecology and Wildlife	Concern regarding impact on biodiversity / Concern regarding impact on wildlife / Concern regarding the loss of wildlife corridors / Suggestion	The Proposed Development has been designed sensitively so that existing wildlife and habitats are retained and enhanced where possible. The impact on wildlife has been fully assessed within **ES Volume 2, Chapter 7: Biodiversity [EN010157/APP/6.2 Revision 2]** and mitigation described within

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RR-030, RR-051, RR-050, RR-045, RR-040		to include better wildlife corridors / Concern regarding danger of the site to wildlife	this chapter. The Proposed Development will include biodiversity improvements including landscaping, habitat management and biodiversity enhancement to retain and enhance ecological and recreational connectivity, expecting to achieve at least a 10% net gain in area habitats, hedgerows and watercourses. The Biodiversity Net Gain obligations for the Proposed Development, including ongoing maintenance are secured by the **Outline LEMP [EN010157/APP/7.5 Revision 3].** Requirement 9 to the **Draft DCO [EN010157/APP/3.1 Revision 4]** secures the submission, approval by the local planning authority and implementation of the Landscape and Ecological Management Plan, which must be substantially in accordance with the **Outline LEMP [EN010157/APP/7.5 Revision 3].** The **Outline LEMP [EN010157/APP/7.5 Revision 3]** outlines that the Appointed Principal Contractor will be responsible for ensuring the habitat creation and enhancement outlined is implemented, delivered and managed for 40 years duration in compliance with the DCO delivering the expected BNG condition and that a feedback loop is in place for any remedial actions that may be required. A post-construction monitoring programme will be formalised and agreed as part of the DCO Application and included within the Landscape and Ecological Management Plan. This will

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			include validating the BNG to check the anticipated biodiversity net gain is achieved.
RR-027	Ecology and Wildlife	Concern regarding light pollution impact on wildlife	**ES Volume 2, Chapter 7: Biodiversity [EN010157/APP/6.2 Revision 2]** considers the potential effects of lighting associated with the Proposed Development on wildlife, during both the construction and operational stages. Where lighting is required, it would conform to best practice guidelines with respect to minimising light spill into adjacent habitats to prevent disturbance to wildlife, such as bats and bird species. Throughout construction, the use of motion detection or manually operated lighting would be used to avoid constant lighting and the inward/downward direction of light would avoid light spill onto adjacent hedgerows, woodlands, field margins and ditches. Infrared sensor triggered security lighting would be used to minimise impacts on wildlife. Operational lighting would be sensor-triggered security lighting around key electrical infrastructure, and so the Proposed Development would not be continuously lit. Further details are set out in and secured by the **Outline CEMP [EN010157/APP/7.2 Revision 2]** and **Outline DEMP [EN010157/APP/7.4 Revision 2]** via requirements 4 and 15 of the **Draft DCO [EN010157/APP/3.1 Revision 4].**

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RR-049, RR-039, RR-027	Ecology and Wildlife	Concern regarding the construction impact on wildlife / Concern regarding impact of construction on nocturnal species	An independent environmental specialist will be appointed during the construction phase to advise on how to protect valued biodiversity features and comply with environmental legislation. The **Outline CEMP [EN010157/APP/7.2 Revision 2]** documents include best practice measures to avoid or minimise potential impacts to species and habitats, including reducing the risk of pollution to watercourses. The Construction Environmental Management Plan would be substantially in accordance with the **Outline CEMP [EN010157/APP/7.2 Revision 2]** and subject to the approval of the local planning ahead of construction. This is secured via requirement 4 of the **Draft DCO [EN010157/APP/3.1 Revision 4].** More information on the Applicant's assessment of the impacts on biodiversity can be found in **ES Volume 2, Chapter 7: Biodiversity [EN010157/APP/6.2 Revision 2].**
RR-038, RR-027, RR-040, RR-049	Ecology and Wildlife	Concern regarding the impact of fencing on wildlife / Concern regarding the impact on the movement of wildlife / Statement that there are visiting deer around property on Black Tup Lane	A perimeter security fence would be installed to enclose the operational areas of the Proposed Development. The fence is likely to be a wire-mesh deer fence, measuring up to 2m in height. The fence would be designed in such a way to allow small animals to pass under the fence and through the Proposed Development and would also be gated to allow access to and from the Proposed Development. Furthermore, fencing will not be dug into the ground to allow species to push through into the

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			solar PV areas and where appropriate badger gates will allow movement through the proposed fencing. Fencing will avoid enclosing hedgerows and open spaces, deer will be able to utilise the 6m buffer between the security fence and field boundaries to move across the scheme and into the wider landscape. Palisade fencing would be installed around the perimeter of the on-site substation compounds. Palisade fencing is made of steel rails attached to horizontal-running rails, connected to vertical steel joints. The fencing would be up to 2m in height. Details of fencing is secured in the **Design Parameters Document [EN010157/APP/5.8 Revision 2].**
RR-048	Ecology and Wildlife	Concern regarding the impact of panels on flora	Existing plants recorded on the Site are relatively common and widespread in the surrounding area, no scare or legally protected species were identified. The Proposed Development will involve new tree and hedgerow planting, and 126ha of wildflower grassland creation, which would deliver an overall biodiversity net gain once these habitats are fully established, as detailed in and secured by the **Outline LEMP [EN010157/APP/7.5 Revision 3]** via requirement 9 of the **Draft DCO [EN010157/APP/3.1 Revision 4].** See **ES Volume 3, Figure 3.4: Indicative Environmental Masterplan [APP-058]** for more information. More information on the assessment of the impacts on biodiversity can be found in **ES Volume 2, Chapter 7: Biodiversity [EN010157/APP/6.2 Revision 2]** and in **ES**

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			Volume 4, Appendix 7.10: Biodiversity Net Gain Assessment [APP-114].
RR-027	Ecology and Wildlife	Concern regarding the loss of bird habitat / Concern regarding loss of food source for birds / Concern regarding impact on already threatened bird species	Impacts on bird habitats are assessed in **ES Volume 2, Chapter 7: Biodiversity [EN010157/APP/6.2 Revision 2]** and **Habitats Regulations Assessment – Information to Inform Appropriate Assessment [EN010157/APP/5.3 Revision 2].** These are informed by **ES Volume 4, Appendix 7.3: Breeding Bird Survey Report [APP-107], ES Volume 4, Appendix 7.4: Wintering Bird Survey Report [APP-108]** and **ES Volume 4, Appendix 7.9: Passage Bird Survey Report [APP-113].** During construction, there would be a temporary, short-term loss of agricultural land, suitable for foraging and roosting birds associated with the Humber Estuary Special Protection Area/Ramsar site. Mitigation for this loss of land is detailed in and secured by the **Outline LEMP [EN010157/APP/7.5 Revision 3]** and mitigation to reduce the effect of visual and noise disturbance on birds is detailed in and secured by the **Outline CEMP [EN010157/APP/7.2 Revision 2]** via requirement 4 of the **Draft DCO [EN010157/APP/3.1 Revision 4].** Therefore, effects are considered to be not significant. With the implementation of mitigation measures, **ES Volume 2, Chapter 7: Biodiversity [EN010157/APP/6.2 Revision 2]** providing a package of measures to benefit ground nesting birds including 116 ha of grassland creation for nesting, winter seed source and enhancement of insect food under panels has concludes that the effects of the Proposed Development on

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			ground-nesting birds would be Significant during construction and decommissioning, and would be Not Significant (Beneficial) during operation. The **Habitats Regulations Assessment – Information to Inform Appropriate Assessment [EN010157/APP/5.3 Revision 2]** concludes that there would be no adverse effects (alone or in-combination) on the integrity of the European sites as a result of the Proposed Development. As set out in the **Outline LEMP [EN010157/APP/7.5 Revision 3],** the proposed mitigation land, which includes grassland and the creation of wader scrapes, as part of the design is considered to be sufficient to mitigate effects of the Proposed Development on both ground-nesting birds and bird species associated with the Humber estuary. These measures are secured requirement 9 of the draft Development Consent Order. The greatest impact on birds is considered likely to be through land use change and potential habitat loss for breeding and foraging, as shown in the wider land use change research (Wilson *et al.* 2009, Rigal *et al.* 2023). A recent study (Copping *et al,* February 2025), published after Application submission, found that solar farms in south of England can host up to three times as many birds as arable land, with appropriate management
RR-049, RR-027, RR-039	Ecology and Wildlife	Concern regarding the noise impact on wildlife	A Construction Environmental Management Plan would be secured pursuant to requirement 4 of the **Draft DCO [EN010157/APP/3.1 Revision 4]**, and in accordance with the **Outline CEMP [EN010157/APP/7.2 Revision 2]** submitted in

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			support of the DCO application. The **Outline CEMP [EN010157/APP/7.2 Revision 2]** describes the framework of mitigation measures identified in the ES to be followed during the construction phase of the Proposed Development. Effects on wildlife arising from noise impacts have been assessed. Mitigation to reduce the effect of noise disturbance on wildlife, such as bird species, is detailed in and secured by the **Outline CEMP [EN010157/APP/7.2 Revision 2].** Noise and vibration from construction activity and noise from the battery energy storage system and inverters during operation is not considered likely to disturb bats due to generators and or/welfare cabins being turned off at night or if required, positioned at a minimum of 30m from trees or structures suitable for roosting bats. Effects due to noise impacts are considered to be Not Significant.
RR-050	Ecology and Wildlife	Statement that doubtful of accuracy of the BNG figure	As presented in **ES Volume 4, Appendix 7.10: Biodiversity Net Gain Assessment [APP-114],** the calculation has been made using the current Statutory Biodiversity Metric, fully in line with Defra guidance and best practice. The document includes a section outlining the assumptions and limitations made and how these would affect the accuracy of the calculation.
RR-049	Ecology and wildlife	Statement that wildlife mitigation is unconvincing	The proposed wildlife mitigation is based on the assessments made within **ES Volume 2, Chapter 7: Biodiversity [EN010157/APP/6.2 Revision 2]**. As set out in the **Outline LEMP [EN010157/APP/7.5 Revision 3],** approximately 116ha is proposed for specific bird species and other ground nesting

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			birds. Furthermore, an additional 9.5ha is proposed for ecological enhancement areas. As well as providing suitable mitigation for the loss of habitat, wintering and breeding bird habitat associated with the Proposed Development the mitigation areas will also benefit a range other wildlife species. Detailed information regarding the proposed wildlife mitigation can be found within **Outline LEMP [EN010157/APP/7.5 Revision 3]**. The production of the final Landscape and Ecological Management Plan is secured via requirement 9 of the **Draft DCO [EN010157/APP/3.1 Revision 4].**
RR-049	Ecology and wildlife	Statement that there are 50-60 bird species are recorded around property on Black Tup Lane	Black Tup Lane is over 1km from the Proposed Development. Impacts on bird habitats are assessed in **ES Volume 2, Chapter 7: Biodiversity [EN010157/APP/6.2 Revision 2]** and **Habitats Regulations Assessment – Information to Inform Appropriate Assessment [EN010157/APP/5.3 Revision 2].** These are informed by **ES Volume 4, Appendix 7.3: Breeding Bird Survey Report [APP-107], ES Volume 4, Appendix 7.4: Wintering Bird Survey Report [APP-108]** and **ES Volume 4, Appendix 7.9: Passage Bird Survey Report [APP-113].** Local bird populations are likely to benefit from the proposed ecological and mitigation detailed within **Outline LEMP [EN010157/APP/7.5 Revision 3]**. The production of the final Landscape and Ecological Management Plan is secured via requirement 9 of the **Draft DCO [EN010157/APP/3.1 Revision 4].**

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RR-049	Ecology and wildlife	Statement that there are two resident owls around property on Black Tup Lane	Black Tup Lane is over 1km from the Proposed Development. Impacts on bird habitats are assessed in **ES Volume 2, Chapter 7: Biodiversity [EN010157/APP/6.2 Revision 2]** and **Habitats Regulations Assessment – Information to Inform Appropriate Assessment [EN010157/APP/5.3 Revision 2].** These are informed by **ES Volume 4, Appendix 7.3: Breeding Bird Survey Report [APP-107], ES Volume 4, Appendix 7.4: Wintering Bird Survey Report [APP-108]** and **ES Volume 4, Appendix 7.9: Passage Bird Survey Report [APP-113].** Local bird populations including owls are likely to benefit from the proposed ecological mitigation detailed within **Outline LEMP [EN010157/APP/7.5 Revision 3]** which includes retention of all woodland (prime tawny owl foraging habitat) 116 ha of grassland creation and maintenance of 6m buffer between security fencing and hedgerows which will maintain foraging habitat for species such as barn owls. It is also likely that grassland enhancement underneath Solar PV modules may increase the small mammal population locally providing additional foraging habitat. In addition, the provision of eight new Barn owl boxes within the Proposed Development. The production of the final Landscape and Ecological Management Plan is secured via requirement 9 of the **Draft DCO [EN010157/APP/3.1 Revision 4].** which includes over 100ha of grassland together retention of boundary features and margins maintaining foraging habitat as well as the provision of eight new Barn owl boxes within the Proposed Development. The production of the final Landscape and

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			Ecological Management Plan is secured via requirement 9 of the **Draft DCO [EN010157/APP/3.1 Revision 4].**
RR-027	Ecology and wildlife	Concern regarding alteration of existing habitats	As reported in **ES Volume 2, Chapter 7: Biodiversity [EN010157/APP/6.2 Revision 2]**, there are no likely significant effects on biodiversity as a result of the Proposed Development. The majority of the existing habitat comprises large open arable fields. The Proposed Development will involve new tree and hedgerow planting, and wildflower grassland creation, which would deliver an overall biodiversity net gain once these habitats are fully established, as detailed in and secured by the **Outline LEMP [EN010157/APP/7.5 Revision 3]** via requirement 9 of the **Draft DCO [EN010157/APP/3.1 Revision 4].** See **ES Volume 3, Figure 3.4: Indicative Environmental Masterplan [APP-058]** for more information. More information on the assessment of the impacts on biodiversity can be found in **ES Volume 2, Chapter 7: Biodiversity [EN010157/APP/6.2 Revision 2]** and in **ES Volume 4, Appendix 7.10: Biodiversity Net Gain Assessment [APP-114].**
RR-027	Ecology and wildlife	Concern regarding loss of vegetation	Existing vegetation recorded on the Site is relatively common and widespread in the surrounding area. The Proposed Development will involve new tree and hedgerow planting, and wildflower grassland creation, which would deliver an overall biodiversity net gain once these habitats are fully established, as detailed in and secured by the **Outline LEMP [EN010157/APP/7.5 Revision 3]** via requirement 9 of the **Draft**

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			DCO [EN010157/APP/3.1 Revision 4]. See **ES Volume 3, Figure 3.4: Indicative Environmental Masterplan [APP-058]** for more information. More information on the assessment of the impacts on biodiversity can be found in **ES Volume 2, Chapter 7: Biodiversity [EN010157/APP/6.2 Revision 2]** and in **ES Volume 4, Appendix 7.10: Biodiversity Net Gain Assessment [APP-114].**
RR-027	Ecology and wildlife	Statement that hedgerows provide breeding grounds for moths and butterflies / Statement that hedgerows provide food source for birds and bats / Statement that hedgerows provide materials for shelter for wildlife	As detailed within in **ES Volume 2, Chapter 7: Biodiversity [EN010157/APP/6.2 Revision 2]**, where reasonably practicable, hedgerows will be protected and retained by a 10m offset from built infrastructure. As detailed and secured within **Outline LEMP [EN010157/APP/7.5 Revision 3]** via requirement 9 of the **Draft DCO [EN010157/APP/3.1 Revision 4],** existing hedgerows and associated species are likely to benefit from the proposed reduction of hedgerow cutting and extensive hedgerow planting. Furthermore, invertebrates are likely to benefit from the creation of extensive areas of ecological mitigation and enhancement areas, as well as other ecological measures detailed and secured within **Outline LEMP [EN010157/APP/7.5 Revision 3]**. Details of removal retained, and new hedgerow can be found on **Tree Preservation Order and Hedgerow Plans [PDA-007]**. The Proposed Development includes a total length of new hedgerow planting of 19.58km and structural woodland/scrub planting covering approximately 17,833m² of land.

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RR-027	Ecology and wildlife	Concern regarding height of panels blocking bird flight paths	As detailed within **ES Volume 1, Chapter 3: Proposed Development Description [APP-030]** the solar PV modules will be a maximum of 3m in height. As detailed within **ES Volume 2, Chapter 7: Biodiversity [EN010157/APP/6.2 Revision 2]**, where reasonably practicable, the Proposed Development will include a minimum 10m offset between hedgerows, woodland, and built infrastructure, extending to a minimum offset of 15m from ancient woodlands. Given the relatively low height of proposed solar PV modules, which is the equivalent of a well-maintained hedgerow, and offsets from existing habitat, there are no significant effects anticipated in regard to blocking bird flight paths. These obligations are secured in the **Outline LEMP [EN010157/APP/7.5 Revision 3].**
RR-027	Ecology and wildlife	Statement that new planting will not offset the loss of existing habitat	As detailed in **ES Volume 2, Chapter 7: Biodiversity [EN010157/APP/6.2 Revision 2]**, where reasonably practicable, the Proposed Development will include a 10m offset from existing hedgerows and woodland, which extends to 15m for ancient woodland. As detailed and secured within the **Outline LEMP [EN010157/APP/7.5 Revision 3],** via requirement 9 of the **Draft DCO [EN010157/APP/3.1 Revision 4],** the Proposed Development includes extensive habitat creation. As presented in **ES Volume 4, Appendix 7.10: Biodiversity Net Gain Assessment [APP-114],** the Proposed Development will result in at least a 10% net gain in area habitats, hedgerows, and watercourses. The biodiversity net gain calculation has been made using the current Statutory Biodiversity Metric, in line with

Ref number(s)	Theme	Matter raised	Response
			Defra good practice and guidance. The document includes a section outlining the assumptions and limitations which considers times it takes for habitat to reach appropriate condition.
RR-027	Ecology and wildlife	Statement that mineral and metal mining is causing loss of wildlife in Africa	Like many industries, solar panel and BESS manufacturing will require mined metals. The Applicant will endeavor to source panels and BESS technologies that are as sustainable and traceable as possible. The Applicant is a member of the Solar Stewardship Initiative (SSI) and sources PV modules from SSI-aligned manufacturers. The SSI is the leading international audit and assurance scheme dedicated to raising standards throughout the global solar value chain by improving transparency, sustainability, and traceability. SSI performs on-site visits and certifies PV module manufacturing sites according to its ESG and Traceability standards.
RR-048	Ecology and wildlife	Statement that wildlife is being pushed towards solar areas due to housing developments	**ES Volume 2, Chapter 7: Biodiversity [EN010157/APP/6.2 Revision 2]** and the **Habitats Regulations Assessment – Information to Inform Appropriate Assessment [EN010157/APP/5.3 Revision 2]** have assessed effects of the Proposed Development on wildlife. These conclude that no significant adverse effects are anticipated in relation to protected species, with a significant beneficial effect anticipated in relation to ground nesting birds during the operational phase due to the

Ref number(s)	Theme	Matter raised	Response
			provision of mitigation and enhancement areas, including habitat creation. Measures to mitigate and enhance the Site for wildlife are detailed and secured in the **Outline LEMP [EN010157/APP/7.5 Revision 3]**.
RR-041	Ecology and wildlife	Concern that panels in section B1 are too close to barn owl and kestral nesting boxes	The location of all proposed bird boxes have considered habitat adjacent to the Proposed Development and proposed habitat creation as detailed and secured within the **Outline LEMP [EN010157/APP/7.5 Revision 3]** via requirement 9 of the **Draft DCO [EN010157/APP/3.1 Revision 4].** No barn owl or kestrel boxes are proposed within Land Area B1. The proposed barn owl box closest to Land Area B1 is within a retained lines of trees adjacent to a proposed ecological mitigation area comprising approximately 11ha of grassland and Monk Dike, both of which will provide suitable barn owl hunting habitat. The closest proposed kestrel box to Land Area B1 is within Land Area B8. The proposed kestrel box is positioned where there is an existing large tree inside a proposed ecological mitigation area comprising approximately 8 ha of grassland.
RR-041	Ecology and wildlife	Concern regarding noise impact on wildlife due to BESS in sections B4, B1, B7, B8	The impact on wildlife has been fully assessed within **ES Volume 2, Chapter 7: Biodiversity [EN010157/APP/6.2 Revision 2]** and mitigation described within this chapter. This mitigation includes a buffer of 15m from ancient woodland, and 10m buffer from other woodlands, hedgerows, and watercourses. With these mitigation measures in place, there is

Ref number(s)	Theme	Matter raised	Response
			not predicted to be a significant adverse environmental effect on ecological receptors. These measured are secured in the **Outline LEMP [EN010157/APP/7.5 Revision 3].** An **Outline BSMP [EN010157/APP/7.6 Revision 2]** has also been produced which identifies the key standards, guidelines, and principles the Applicant will adhere to during the detailed design and operation of the BESS within the Proposed Development. This **Outline BSMP [EN010157/APP/7.6 Revision 2]** has been produced in order to respond to the risks and concerns around the potential for a battery fire event at a BESS. The production of the final Battery Safety Management Plan is secured via requirement 8 of the **Draft DCO [EN010157/APP/3.1 Revision 4].**
RR-041	Ecology and wildlife	Concern regarding access across fields for bats, deer and hare in Land Area B	The Proposed Development's operational fence line would be designed in such a way to allow small animals to pass through the Proposed Development and would also be gated to allow access to and from the Proposed Development. Furthermore, fencing will not be dug into the ground to allow species to push through into the solar PV areas and, where appropriate, badger gates will allow movement through the proposed fencing. Fencing will avoid enclosing hedgerows and open spaces, ensuring a buffer corridor from hedgerow and riparian boundaries to provide room for deer, brown hare, and other wildlife to move through the landscape.

Ref number(s)	Theme	Matter raised	Response
			Where reasonably practicable, the Proposed Development layout has included suitable offsets from existing boundary habitats to ensure bats can continue to use the Site for foraging, and/or commuting. As explained within **ES Volume 2, Chapter 7: Biodiversity [EN010157/APP/6.2 Revision 2]** there are no significant effects on bats anticipated as a result of the Proposed Development due to the measures detailed and secured within the **Outline LEMP [EN010157/APP/7.5 Revision 3]**, **Outline CEMP [EN010157/APP/7.2 Revision 2]** and **Outline OEMP [EN010157/APP/7.3 Revision 2]** via requirements 9, 4 and 14 of the **Draft DCO [EN010157/APP/3.1 Revision 4].**
RR-039	Ecology and wildlife	Concern regarding the safety of wildlife crossing road networks	As detailed and secured within the **Design Parameters Document [EN010157/APP/5.8 Revision 2]** the Proposed Development's operational fence line is designed in such a way to allow small animals to pass through the Proposed Development. The operational fence line would also be gated to allow access to and from the Proposed Development, rather than being forced to use road networks. Furthermore, fencing will not be dug into the ground to allow species to push through into the solar PV areas and, where appropriate, badger gates will allow movement through the proposed fencing. Fencing will avoid enclosing hedgerows and open spaces, ensuring a buffer corridor from hedgerow and riparian boundaries to provide room for deer, brown hare, and other wildlife to move through the landscape.

Ref number(s)	Theme	Matter raised	Response
RR-027, RR-039	Environment	Concern regarding the impact on environment	As part of the DCO process the Applicant has carried out an EIA to assess the likely significant effects (both positive and negative) that the Proposed Development could have on the environment and local communities. The final results of assessments undertaken is presented in the **ES Volume 2, Chapters 6,8,10 to 15 [APP-042, APP-044, APP-046 to APP-051] and Chapter 7 and Chapter 9 [EN010157/APP/6.2 Revision 2],** which accompanies the DCO application. The ES provides a detailed description of the Proposed Development. It also outlines details of the proposed mitigation measures during construction, operation (including maintenance) and decommissioning of the Proposed Development. The design of the Proposed Development has evolved throughout the environmental assessment process to avoid or minimise environmental effects and in response to consultation and engagement feedback, where appropriate.
RR-048	Environment	General climate change scepticism	It is a generally agreed amongst the scientific community that climate change is occurring, largely due to rising levels of carbon dioxide and other greenhouses gases. The Intergovernmental Panel on Climate Change provides policy makers with regular scientific assessments on climate change, its implications, and potential future risks. For more information on climate change visit https://www.gov.uk/guidance/climatechange-explained

Ref number(s)	Theme	Matter raised	Response
RR-045	Environment	Recognition of the need for renewable energy	The UK has a legally binding commitment to achieve net zero carbon emissions by 2050. As one of the cheapest and most rapidly deployable forms of renewable energy, solar will play an important role in achieving this commitment. The Energy Security Strategy (April 2022) set an ambition of 70 GW of solar by 2035. The current Labour government made major commitments to the delivery of clean energy in its election manifesto, including to achieve “Clean Power by 2030”, including tripling solar power by 2030. The Applicant acknowledges the need for a range of renewable energy projects in order to secure the UK's energy security, and in order to reach our net zero targets. The Proposed Development would generate enough electricity to power up to 167,000 homes and store excess energy generated, further supporting the growth of renewable energy production in the UK.
RR-048	Environment	Statement that sceptical about green credentials	The UK has a legally binding commitment to achieve net zero carbon emissions by 2050. As one of the cheapest and most rapidly deployable forms of renewable energy, solar will play an important role in achieving this commitment. The Energy Security Strategy (April 2022) set an ambition of 70GW of solar by 2035. The current Labour government made major commitments to the delivery of clean energy in its election manifesto, including to achieve “Clean Power by 2030”, including tripling solar power by 2030. The Applicant is one of the world’s

Ref number(s)	Theme	Matter raised	Response
			largest power companies, with an ambition to become carbon neutral by 2040.
RR-027, RR-048, RR-044, RR-040	Environment	Statement that the Proposed Development will not be environmentally friendly and/or will create more pollution by other means	The Proposed Development has the potential to affect the global climate through the addition or avoidance of greenhouse gas emissions. Greenhouse gas emissions could occur directly from construction, operation and decommissioning activities (e.g. fuel consumption), but emissions occurring outside of the draft Order Limits must also be considered, such as those resulting from the extraction, manufacture and transportation of materials to the Site during construction. The **Outline CEMP [EN010157/APP/7.2 Revision 2]** documents measures to reduce greenhouse gas emissions in the construction phase. Such measures could include decreasing fuel use by maximising energy efficiency, promoting sustainable fuels and recycled materials, and using locally sourced materials as much as is practicable. During the operational phase, significant greenhouse gas savings are anticipated due to the displacement of fossil-fuel derived electricity within the National Grid. Proposed planting could increase the carbon sequestration potential of the land. The production of the final Construction Environmental Management Plan is secured via requirement 4 of the **Draft DCO [EN010157/APP/3.1 Revision 4].** Overall, the Proposed Development is anticipated to have a significant beneficial effect on the climate, with 4.1 million tonnes of carbon dioxide equivalent anticipated to be saved over the lifespan of the Proposed Development when compared to

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			Combined Cycle Gas Turbine-generated electricity. Further details are available in **ES Volume 2, Chapter 8: Climate [APP-044].**
RR-044	Environment	Statement that there are better alternatives to solar	The UK has a legally binding commitment to achieve net zero carbon emissions by 2050. As one of the cheapest and most rapidly deployable forms of renewable energy, solar will play an important role in achieving this commitment. Solar can already produce as much as 30% of the UK's electricity at different points throughout the year, and in 2020, solar provided more than 4% of the UK's total energy supply. One of the advantages of solar energy is its versatility across all regions of the UK. Solar panels do not require direct sunlight to function and can generate power consistently throughout the year, even on cloudier days. Moreover, the reliability of solar power is bolstered by the ability to accurately predict sunlight hours for each day, facilitating precise forecasts of solar energy generation. Onsite battery storage will allow the Applicant to store and export energy during peak times, even after the sun has gone down.
RR-048	Environment	Statement that the Proposed Development benefit will not offset the impact of the creation of the project	**ES Volume 1, Chapter 5: Approach to the EIA [APP-041]** outlines how the EIA has been undertaken. Significant environmental effects have been avoided where possible in the first instance through design refinements and iterations. Where adverse environmental effects were identified through early assessment work, opportunities to reduce or control impacts and

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			effects have been identified and incorporated into the Proposed Development. In accordance with IEMA's 'Environmental Impact Assessment Guide to Shaping Quality Development', this is known as 'primary' mitigation (hereafter referred to as 'embedded' mitigation). In addition, opportunities to enhance the beneficial environmental effects of the Proposed Development have also been sought and incorporated into the Proposed Development. The assessment of likely effects (without additional mitigation) presented in **ES Volume 2, Chapters 6,8,10 to 15 [APP-042, APP-044, APP-046 to APP-051] and Chapter 7, Chapter 9 [EN010157/APP/6.2 Revision 2]** is a general commentary of the likely effects that could occur as a result of the construction, operation (including maintenance) and decommissioning of the Proposed Development, taking account of the embedded (primary) mitigation that forms part of the Proposed Development being assessed, but in the absence of any additional mitigation measures. This general commentary sets the scene for the potential need for additional mitigation measures to be considered. Mitigation measures are then considered following a mitigation hierarchy aiming first to avoid, then to reduce, and/or lastly to offset adverse effects. The remaining effects ("residual effects") after the implementation of mitigation measures, are then assessed for significance. These effects are reported as either significant or not significant in the summary section of each environmental factors chapter presented in **ES Volume 2, Chapters 6,8,10 to 15 [APP-042, APP-044, APP-046 to APP-051] and Chapter 7 and Chapter 9**

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			[EN010157/APP/6.2 Revision 2]. These effects are also summarised in **ES Volume 4, Non-Technical Summary of the Environmental Statement [APP-094].** In general, the majority of residual effects reported in the ES are not significant, however there are likely significant adverse effects reported for landscape and visual (during construction and operational phases). These would reduce in the longer term due to the establishment of mitigation. For biodiversity, the likely effects are generally not significant, however the disturbance and habitat loss is anticipated to result in significant short-term and localised effects during the construction phase, whilst grassland recovers and re-grows following the works. The Proposed Development is considered to have a significant beneficial effect with regards to greenhouse gas emissions.
RR-049	Environment	Statement that the proposed mitigation is unconvincing	As part of the EIA, an approach has been adopted where significant environmental effects have been avoided where possible in the first instance through design refinements and iterations. Where adverse environmental effects were identified through early assessment work, opportunities to reduce or control impacts and effects have been identified and incorporated into the Proposed Development. In accordance with IEMA's 'Environmental Impact Assessment Guide to Shaping Quality Development'. The **ES Volume 2, Chapters 6,8,10 to 15 [APP-042, APP-044, APP-046 to APP-051] and Chapter 7, Chapter 9 [EN010157/APP/6.2 Revision 2]** provides a detailed description

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			of the Proposed Development. It also outlines details of the proposed mitigation measures construction, operation (including maintenance) and decommissioning of the Proposed Development. The design of the Proposed Development has evolved throughout the environmental assessment process to avoid or minimise environmental effects and in response to consultation and engagement feedback, where appropriate. The EIA process has been undertaken by competent experts and has been led by a consultant that is a registrant to the Institute of Environmental Management and Assessment (IEMA) EIA Quality Mark. The EIA has been undertaken in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, and to ensure that the DCO application for the Proposed Development is in accordance with the relevant National Policy Statement (NPS), as required. Furthermore, the EIA is undertaken in accordance with the legislation and guidance relevant to the specific environmental factors being assessed. The EIA tailors each environmental factor that is assessed to the relevant industry standard methods and criteria, using professional opinion where it is appropriate to do so. Following the submission of the DCO application, the ES will be subject to the DCO examination process. The mitigation proposed, and the mechanisms to secure it, is therefore required to be sufficiently robust to support the Proposed Development through statutory processes.

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RR-049	Environment	Statement that mitigation measures have no significance in comparison to what is lost	Whilst it is accepted that there will be a change in land use resulting from the Proposed Development, the Environmental Statement demonstrates that adverse environmental factors have been mitigated against to reduce their impact to not significant adverse where reasonably practicable. The view that mitigation measures will not compare to the baseline land use is subjective, and whilst there may be benefits that the current baseline will provide, it is considered that the Proposed Development will have an overall positive impact.
RR-049	Environment	Question regarding if impact assessments are both short and long term	The environmental impact assessments completed for the Proposed Development have considered the entire lifetime of the Proposed Development (construction, operation (including maintenance), and decommissioning).
RR-027	Environment	Concern regarding loss of / impact on sensitive environmental areas and receptors	The Proposed Development design will include landscaping, habitat management and ecological mitigation/enhancement, which will be refined as the design progresses. Indicative areas for planting and for ecological mitigation and enhancement are shown on **ES Volume 3, Figure 3.4: Indicative Environmental Masterplan [APP-058].** Management of habitat creation and enhancement strategies will last throughout the whole operational life of the Proposed Development, as detailed in **Outline LEMP [EN010157/APP/7.5 Revision 3]** The production of the Landscape and Ecological Management Plan is secured

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			via requirement 9 of the **Draft DCO [EN010157/APP/3.1 Revision 4].** The existing hedgerows, woodland and field margins would be retained as part of the Proposed Development as much as possible, with the exception of gaps required for new access points, visibility at turnings and for the installation of cabling. Existing agricultural tracks and field margins would be used for access points where reasonably practicable and the width of any new gaps, if required, would be kept to a minimum. The design is expected to incorporate a minimum offset of 10m from all existing trees/woodland areas and boundary hedgerows, where reasonably practicable, to ensure there is a sufficient distance between the infrastructure and the field boundary to allow habitat connectivity and biodiversity and landscape improvements. This offset increases to 15m from any ancient woodland where present. Landscaping, including new hedgerow and tree planting is proposed to avoid or minimise significant environmental effects. The final location and scale of planting is yet to be determined and will take into consideration the landscape character of each field of the Proposed Development by allowing views to remain open, where planting would not be appropriate. Planting, including mitigation planting, is expected to be delivered from the earliest stages of the Proposed Development in order to maximise biodiversity value, screening and other environmental benefits. Waterlogged soil will be avoided as it is not deemed

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			suitable for planting operations. The planting type would be decided on each species' ability to be resilient to the impacts of climate change and comprise a majority of native (and of local provenance) species. Planting is expected to include a mixture of conifers and broadleaf plants as per habitat enhancement requirements. A mixture of different native species of scrub will be used wherever woodland planting is not viable. Low plants will be used in buffer zones and near hedgerows in order to minimise impact on landscape views. Species of grass will also be used to create plots of short grassland between the solar panel modules. Plant species will be appropriately chosen for sections above ground service in order to avoid root damage. More information on our assessment of the impacts on biodiversity can be found in **ES Volume 2, Chapter 7: Biodiversity [EN010157/APP/6.2 Revision 2].**
RR-027	Environment	Statement that thorium reactors are a more efficient alternative	**ES Chapter 4 Alternatives and Design Iteration [APP-040]** provides a summary of how alternative options have been considered. Thorium reactors have not been considered viable for this Site by the Applicant or a realistic alternative to the Proposed Development. The commercial and construction viability of nuclear generation is not comparable to that of solar energy. Delivering on the UK's Net Zero commitment requires a mixture of technologies delivered at different scales. The Proposed

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			Development will maximise the grid connection offer the Applicant has with Northern Power Grid
RR-027, RR-039	Environment	Statement that more efficient alternatives should be considered first	The Applicant set out its consideration of alternative renewable technologies within **ES Volume 1, Chapter 4: Alternatives and Design Iteration [APP-040]**. This concluded that alternative types of renewable energy generation technologies, such as wind and hydrogen, were not considered viable for this Site.
RR-026	Environment	Statement that mitigation is tokenistic	The **ES** provides a detailed description of the Proposed Development. It also outlines details of the proposed mitigation measures construction, operation (including maintenance) and decommissioning of the Proposed Development. The design of the Proposed Development has evolved throughout the environmental assessment process to avoid or minimise environmental effects and in response to consultation and engagement feedback, where appropriate. The EIA process has been undertaken by competent experts and has been led by a consultant that is a registrant to the Institute of Environmental Management and Assessment (IEMA) EIA Quality Mark. The EIA has been undertaken in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, and to ensure that the DCO application for the Proposed Development is in accordance with the relevant National Policy Statement (NPS), as required. Furthermore, the EIA is undertaken in accordance with the legislation and guidance relevant to the specific environmental factors being assessed.

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			The EIA tailors each environmental factor that is assessed to the relevant industry standard methods and criteria, using professional opinion where it is appropriate to do so. Following the submission of the DCO application, the ES will be subject to the DCO examination process. The mitigation proposed, and the mechanisms to secure it, is therefore required to be sufficiently robust to support the Proposed Development through statutory processes.
RR-047	Environment	Statement that RWE are polluters	RWE (The Applicant) has historically had a large carbon footprint, especially because of its legacy in coal-fired power. But over the last few years, the company has made a major strategic shift and is now one of the largest investors in renewable energy. RWE (The Applicant) extended its 2040 carbon neutrality plan beyond its power plant emissions (Scope 1) to all its activities, including its Scope 3 emissions from selling coal or gas. It aims to reduce Scope 1 and 2 emissions by 50% by 2030 and its Scope 3 emissions by 30% by 2030. The company's 2030 targets were certified by the Science-Based Targets Initiative as in line with the Paris Agreement.
RR-044	Environment	Statement that sheep grazing is not carbon neutral	Over 95% of the solar panel areas can be made available for sheep grazing and the Applicant has agreed to leases which grant the right to graze sheep over the lifetime of the Proposed Development. The Applicant accepts that grazing sheep may contribute to carbon emissions, however the benefits of

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			facilitating sheep grazing include continued agricultural use and benefits for soil organic matter and structure.
RR-039	Environment	Concern regarding the environmental impact of the construction	The Proposed Development has the potential to affect the global climate through the addition or avoidance of greenhouse gas emissions. Greenhouse gas emissions could occur directly from construction, operation and decommissioning activities (e.g. fuel consumption), but emissions occurring outside of the draft Order Limits must also be considered, such as those resulting from the extraction, manufacture and transportation of materials to the Site during construction. The **Outline CEMP [EN010157/APP/7.2 Revision 2]** documents measures to reduce greenhouse gas emissions in the construction phase. Such measures could include decreasing fuel use by maximising energy efficiency, promoting sustainable fuels and recycled materials, and using locally sourced materials as much as is practicable. Overall, the Proposed Development is anticipated to have a significant beneficial effect on the climate, with 4.1 million tonnes of carbon dioxide equivalent anticipated to be saved over the lifespan of the Proposed Development when compared to Combined Cycle Gas Turbine-generated electricity. Further details are available in **ES Volume 2, Chapter 8: Climate [APP-044].** The production of the final Construction Environmental Management Plan is secured via requirement 4 of the **Draft DCO [EN010157/APP/3.1 Revision 4].**

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RR-039	Environment	Concern regarding the release of carbon from scraping topsoil	The effects on carbon were assessed in **ES Volume 2, Chapter 8: Climate [APP-044].** Overall, it was concluded that the Proposed Development would have a significant beneficial effect on Greenhouse Gas emissions. Therefore, any loss of carbon through topsoil will be outweighed by the significant benefits that the Proposed Development will have.
RR-039	Environment	Concern regarding environmental impact of importing panels	A full lifecycle greenhouse gas assessment has been conducted in **ES Volume 2, Chapter 8: Climate [APP-044]**, which takes into account a reasonable worst-case assessment of the embodied emissions from solar PV modules. This has used a wide range of data available from Environmental Product Declarations from solar PV modules from a range of source countries (including China) and includes the emissions of the manufacture and transport of these materials. Inclusive of these embodied emissions, the Proposed Development has been demonstrated to have a net carbon negative effect, contributing to net carbon savings globally, and resulting in net greenhouse gas savings of 4.1 million tonnes of carbon dioxide equivalent.
RR-045, RR-026, RR-039, RR-048	General	Statement that the Proposed Development will only benefit developer / Concern that the main benefit of the Proposed Development will be to landowners and the developer / Statement that there can be	If consented, the Proposed Development would generate approximately 320MW of clean, green, electricity; enough energy to power approximately 136,000 homes every year. This represents a significant contribution to local and national climate commitments, by helping to decarbonise our energy mix, reduce

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		no benefit can be had from the Proposed Development	bills and improve the UK's energy security. In addition, the Proposed Development would also: • Support the UK's net zero targets by displacing over 11,400,000 tonnes of CO2 from equivalent fossil fuel energy - that equates to taking c. 166,000 cars off the road for a year. • Deliver over 50% BNG on-site, providing new and improved habitats, such as wildflower meadows, grassland areas, bird and bat nesting boxes. • Provide additional opportunities for public recreation, with a network of proposed new permissive paths across the site. • Provide up to 19.5km of proposed new hedgerows and trees, including a mix of mature and semimature tree planting to further improve visual screening and habitat creation. • Introduce educational opportunities across the site, including information boards providing information about local historical features. • Provide a Community Benefit Fund of up to £4.2 million to support local community groups and initiatives.

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			• Generate around £18.5 million in business rates over the lifetime of the Proposed Development, to be used by East Riding of Yorkshire Council to fund important local services.
RR-048	General	Concern regarding potential costs to taxpayers	The Proposed Development is being brought forward independently by the Applicant. There are no subsidies from UK Government to deliver this project.
RR-045	General	Concern that profits made from the Proposed Development will go abroad	The Applicant, RWE Renewables UK Solar and Storage Limited, is a registered UK company.
RR-041, RR-033, RR-037, RR-047, RR-040, RR-039	General	General opposition / Statement that the Proposed Development should not be built / Statement that the Proposed Development is just greenwashing / Statement that the Proposed Development should be refused	The Applicant acknowledges the range of views expressed in response to the statutory consultation. The UK has made a legally binding commitment to achieve net zero carbon emissions by 2050. This can only be achieved with the roll-out of reliable, affordable, clean energy sources such as solar. Solar farms, such as the Proposed Development, would make a meaningful contribution to local and national climate commitments, reducing our impact on the environment and contributing to energy security. **The Planning Statement [APP-147],** which has been submitted as part of the DCO Application, sets out the need for the Proposed Development, and how it is in accordance with national and local planning policy.
RR-028	General	Statement that nothing can outweigh the losses caused	The Applicant acknowledges the range of views expressed in response to the statutory consultation. The UK has made a

Ref number(s)	Theme	Matter raised	Response
		by the Proposed Development	legally binding commitment to achieve net zero carbon emissions by 2050. This can only be achieved with the roll-out of reliable, affordable, clean energy sources such as solar. Solar farms, such as the Proposed Development, would make a meaningful contribution to local and national climate commitments, reducing our impact on the environment and contributing to energy security. The **Planning Statement [APP-147]**, which has been submitted as part of the DCO Application, sets out the need for the Proposed Development, and how it is in accordance with national and local planning policy. **Planning Statement [APP-147]** concludes that the benefits of the Proposed Development are considered to outweigh any adverse effects.
RR-045	General	Other parts of the country should be considered for location of the development	East Riding of Yorkshire is well suited for solar energy generation, with good levels of sunshine, along with days that are cool and clear, maximising the efficiency of solar modules. The Applicant's site selection process has been extensive, guided by the need to identify suitable land within a reasonable proximity to the Substation at National Grid Creyke Beck, which is where the energy generated by the Proposed Development will feed into the National Electricity Network. Further information is available in **Appendix 2 – Site Selection Assessment to the Planning Statement [APP-147].**
RR-048, RR-039	General	Concern regarding the efficiency of solar	Solar can already produce as much as 30% of the UK's electricity at different points throughout the year, and in 2020,

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			solar provided more than 4% of the UK's total energy supply. One of the advantages of solar energy is its versatility across all regions of the UK. Solar panels do not require direct sunlight to function and can generate power consistently throughout the year, even on cloudier days. Moreover, the reliability of solar power is bolstered by the ability to accurately predict sunlight hours for each day, facilitating precise forecasts of solar energy generation. Onsite battery storage will allow us to store and export energy during peak times, even after the sun has gone down.
RR-048, RR-040	General	Statement that the primary concern should not be profits	Whilst the Applicant is a commercial entity, the Proposed Development has a range of benefits to the community and the UK as a whole. If consented, the Proposed Development would generate approximately 320MW of clean, green, electricity; enough energy to power approximately 136,000 homes every year. This represents a significant contribution to local and national climate commitments, by helping to decarbonise our energy mix, reduce bills and improve the UK's energy security. In addition, the Proposed Development would also: • Support the UK's net zero targets by displacing over 11,400,000 tonnes of CO2 from equivalent fossil fuel energy - that equates to taking c. 166,000 cars off the road for a year.

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			• Deliver over 50% Biodiversity Net Gain (BNG) on-site, providing new and improved habitats, such as wildflower meadows, grassland areas, bird and bat nesting boxes. • Provide additional opportunities for public recreation, with a network of proposed new permissive paths across the site. • Provide up to 19.5km of proposed new hedgerows and trees, including a mix of mature and semimature tree planting to further improve visual screening and habitat creation. • Introduce educational opportunities across the site, including information boards providing information about local historical features. • Provide a community benefit fund of up to £4.2 million to support local community groups and initiatives. • Generate around £18.5 million generated in business rates over the lifetime of the Proposed Development, to be used by East Riding of Yorkshire Council to fund important local services
RR-027	General	Statement that developer should urge government to reconsider approach to	The Applicant fully supports the government's policy to meet net zero and believes in a mix of reliable, affordable, clean energy sources are required to achieve net zero carbon emissions by 2050. Solar farms, such as the Proposed Development, would make a meaningful contribution to local and national climate

Ref number(s)	Theme	Matter raised	Response
		renewable energy development	commitments, reducing our impact on the environment and contributing to energy security. The **Planning Statement [APP-147]**, which has been submitted as part of the DCO Application, sets out the need for the Proposed Development, and how it is in accordance with national and local planning policy.
RR-028	General	Statement that there are more solar projects than needed in the UK	The UK has a legally binding commitment to achieve net zero carbon emissions by 2050. As one of the cheapest and most rapidly deployable forms of renewable energy, solar will play an important role in achieving this commitment. The Energy Security Strategy (April 2022) set an ambition of 70GW of solar by 2035. The current La-bour government made major commitments to the delivery of clean energy in its election manifesto, including to achieve “Clean Power by 2030”, including tripling solar power by 2030. This cannot be achieved through rooftop and brownfield solar installations alone, as they have considerable practical barriers of their own. Many domestic and industrial buildings either do not have roofs made of suitable material to support a solar system, do not have the infrastructure to export electricity to the gird, or simply present as an unaffordable solution, with initial costs of installation too high for some. As a result, agricultural land typically of moderate or low quality is also used, without impacting on food security.
RR-048	General	Statement that the loss of land is too great in comparison to the number of	The Proposed Development, would make a meaningful contribution to local and national climate commitments, reducing our impact on the environment and contributing to energy

Ref number(s)	Theme	Matter raised	Response
		homes the Proposed Development would provide energy for	security. The **Planning Statement [APP-147]**, which has been submitted as part of the DCO Application, sets out the need for the Proposed Development, and how it is in accordance with national and local planning policy.
RR-048	General	Concern regarding Government providing too much funding for renewable energy projects	The Proposed Development is being brought forward independently by the Applicant. There are no subsidies from UK Government to deliver this Proposed Development.
RR-048	General	General concern regarding disruption associated with the Proposed Development	The Applicant has assessed any potential local impacts of construction and proposed measures to mitigate them if necessary. An **Outline CEMP [EN010157/APP/7.2 Revision 2]** has been developed as part of the DCO application to outline how construction activities will be managed throughout the construction process. The **Outline CEMP [EN010157/APP/7.2 Revision 2]** sets out strategies and measures for managing construction activities, including stakeholder engagement, site management, environmental considerations, community impact, health and safety, and monitoring and compliance. The production of the final Construction Environmental Management Plan is secured via requirement 4 of the **Draft DCO [EN010157/APP/3.1 Revision 4].**
RR-030, RR-047	General	Statement that the technology may be obsolete in the near future	The Applicant will use the most effective and efficient solar and BESS infrastructure available at the time of construction. Advances in materials, panel efficiency and energy storage have

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			rapidly improved panel performance in the last 10 years making them a highly reliable energy solution.
RR-047, RR-039	General	Statement that solar should be well-planned not target driven	The Applicant prepared and submitted a **Design Approach Document [APP-149]** which outlines the approach taken to the design development of the Proposed Development, including how the design has been shaped and influenced by the local landscape, and with local communities and their enjoyment of the local area in mind.
RR-044, RR-033b	General	The proposal is not compliant with NPS EN-3.	The Applicant considers the compliance of the Proposed Development against NPS EN-3 in the **Policy Accordance Tables**, at **Appendix 1 to the Planning Statement [APP-147]**. At section 9 of the Planning Statement, it is concluded that the Proposed Development is compliant with NPS EN-3, as well as NPS EN-1 and EN-5, the National Planning Policy Framework and the East Riding of Yorkshire Local Plan.
RR-044, RR-033b	General	Statement that more acres of land are being used than required per MW	**Appendix 2 – Site Selection Assessment to the Planning Statement [APP-147]** notes that NPS EN-3 paragraph 2.10.17 sets out that a typical 50 MW solar farm will consist of around 100,000 to 150,000 panels and cover between 125 to 200 acres. Based on this, to achieve the grid connection of 320 MW, the Applicant determined that it would need approximately 2,000 acres / 820 ha based on an overplanting ratio of 1.6. NPS EN-3 paragraph 2.10.55 states that: "*The direct current (DC) installed generating capacity of a solar farm will decline*

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			over time in correlation with the reduction in panel array efficiency. Light induced degradation affects solar panels differently depending on the technology used to construct the panel and is one factor, along with price, that developers need to consider when deciding on a solar panel technology to be used. Applicants may account for this by overplanting solar panel arrays. Footnote 92 sets out that "*Overplanting refers to the situation in which the installed generating capacity or nameplate capacity of the facility is larger than the generator's grid connection. This allows developers to take account of degradation in panel array efficiency over time, thereby enabling the grid connection to be maximised across the lifetime of the site. Such reasonable overplanting should be considered acceptable in a planning context so long as it can be justified and the electricity export does not exceed the relevant NSIP installed capacity threshold throughout the operational lifetime of the site and the proposed development and its impacts are assessed through the planning process on the basis of its full extent, including any overplanting".* Solar panels generate electricity from the sun in Direct Current (DC) electricity. Generating capacity is often referred to in terms of megawatt peak (MWp). Inverters convert the DC electricity from the solar panels to Alternating Current (AC) which is used by the national grid. NPS EN-3 refers to MW output, which should be measured in MWp or DC in the calculation to establish per-acre generation. On the basis of the below calculations, the parameters of the

Ref number(s)	Theme	Matter raised	Response
			Proposed Development are proportionately comparable with the typical 50MW solar farm included in EN-3. 50MW being the capacity threshold set by NPS EN-3 in England. The total acreage area of the Proposed Development is 2,200 acres, which is the total land within the Order Limits. The acreage of the panelled areas (measured as within the fence surrounding panelled areas, which would also include supporting infrastructure such as access tracks, inverters, transformers and BESS which are in addition to the area needed for generation) is 1,570 acres. The ratio of the panelled areas of the Proposed Development to its DC generation is therefore as follows: 1570 acres / 512MWp = 3.06 Acres/MW DC The Proposed Development is therefore directly comparable with the parameters of "between 2 to 4 acres for each MW of output" suggested by paragraph 3.10.8 of NPS EN-3 (set out above).
RR-044	General	Concern that National Grid Creyke Beck substation does not have capacity	The Applicant received a grid connection offer from Northern Power Grid on 8 June 2021, offering connection to the existing 132 kV National Grid Creyke Beck Substation. That offer was accepted by the Applicant on 15 July 2021. Therefore, the Applicant confirms that the output of the Proposed Development will be exported via the National Grid Creyke Beck Substation and that the National Grid Creyke Beck Substation has available capacity for the Proposed Development.

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RR-044	General	Statement that new substation at Wanlass Beck may not get built due to Hornsea 4 being abandoned	The Applicant is aware of the recent news regarding the Hornsea 4 project. This is not expected to impact the deliverability of the Proposed Development as the accepted grid connection offer from Northern Power Grid is to connect into the existing National Grid Creyke Beck Substation.
RR-044	General	Statement that it is not clear how many panels will be installed	The exact number of panels is not available and will be determined at detailed design. It is estimated to be between 600,000 and 900,000 based off a typical 50MW solar farm.
RR-044	General	Concern that 320MW output is disproportionate with Hornsea 1-3 output	Delivering on the UK's Net Zero commitment requires a mixture of technologies delivered at different scales. The Proposed Development will maximise the grid connection offer the Applicant has with Northern Power Grid.
RR-039	General	Statement that residents are already opposing a caravan park in the area due to being out of character	The Applicant notes the comment. A full LVIA assessment has been carried out as set out in **ES Volume 2, Chapter 11: Landscape and Visual [APP-047].** The Applicant has proposed a number of mitigation measures to help assimilate the Proposed Development into the existing landscape but acknowledges that significant effects are identified which is not an uncommon consequence of the type and scale of the development proposed. The Applicant takes seriously its duty to deliver a high-quality proposal and considers it has maximised the opportunities to deliver good design and mitigation measures where appropriate.

Ref number(s)	Theme	Matter raised	Response
			Requirement 9 to the **Draft DCO [EN010157/APP/3.1 Revision 4]** secures the submission, approval by the local planning authority and implementation of the Landscape and Ecological Management Plan, which must be substantially in accordance with the **Outline LEMP [EN010157/APP/7.5 Revision 3].**
RR-027, RR-044	Glint and Glare	General concern regarding glint and glare	The solar PV modules are dark in colour due to their anti-reflective coatings and are manufactured with low-iron, ultra-clear glass with specialised coatings and textures to enable maximum absorption. The combination of these factors increases electrical energy production of the panels and reduces reflected rays at the same time. **ES Volume 4, Appendix 5.4: Glint and Glare Assessment [APP-100]** has been undertaken which considers potential glint and glare impacts on roads, PRoW, residential dwellings as well as aviation. This assessment concludes that for all receptors, including dwelling, roads and aviation receptors (Beverley Airfield and Hill Farm Airfield & Burton-Constable Airfield) no significant effects are predicted following the application of mitigation.
RR-027. RR-041	Glint and Glare	Concern regarding the impact of glint and glare on birds / Concern regarding impact of glint and glare on buzzards	The solar PV modules are dark in colour due to their anti-reflective coatings and are manufactured with low iron, ultra-clear glass with specialised coatings and textures to enable maximum absorption. The combination of these factors increases electrical energy production of the panels and reduces reflected rays at the same time. As detailed in **ES Volume 2,**

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			Chapter 7: Biodiversity [EN010157/APP/6.2 Revision 2], disruption of flight paths of qualifying bird species associated with the Humber Estuary SPA/Ramsar as a result of glint and glare was scoped out of the EIA. Any effects caused by glint and glare will only potentially occur when the solar PV modules are present during the operation (including maintenance) phase; therefore, no impact is anticipated during the construction or decommissioning phases. Based on the configuration of the solar PV modules and lack of large numbers of birds recorded moving through the Land Areas, it is considered that there would be no adverse effects on the integrity of the populations of the qualifying species of Humber Estuary SPA/Ramsar site in relation to disruption of flight paths as a result of glint and glare. Therefore, this matter was scoped out of the assessment. Buzzard are not a species of conservation concern and are not a qualifying species for designated sites assessed within **Habitats Regulations Assessment – Information to Inform Appropriate Assessment [EN010157/APP/5.3 Revision 2]** and **ES Volume 2, Chapter 7: Biodiversity [EN010157/APP/6.2 Revision 2]**.
RR-027	Glint and glare	Concern regarding glint and glare impact on drivers	The solar PV modules are dark in colour due to their anti-reflective coatings and are manufactured with low-iron, ultra-clear glass with specialised coatings and textures to enable maximum absorption. The combination of these factors increases electrical energy production of the panels and reduces reflected rays at the same time. **ES Volume 4, Appendix 5.4:**

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			Glint and Glare Assessment [APP-100] has been undertaken, which considers potential impacts on road users among other receptors. The assessment concludes that no significant effects are predicted for road users largely due to the presence of screening, for example existing vegetation, or the distance between road users and the nearest reflecting panel.
RR-027	Glint and glare	Concern regarding glint and glare impact on aircrafts	The solar PV modules are dark in colour due to their anti-reflective coatings and are manufactured with low-iron, ultra-clear glass with specialised coatings and textures to enable maximum absorption. The combination of these factors increases electrical energy production of the panels and reduces reflected rays at the same time. **ES Volume 4, Appendix 5.4: Glint and Glare Assessment [APP-100]** has been undertaken which considers potential impacts on roads, PRoW, residential dwellings as well as aviation. This assessment concludes that for all receptors, including dwelling, roads and aviation receptors (Beverley Airfield and Hill Farm Airfield & Burton-Constable Airfield) no significant effects are predicted following the application of mitigation.
RR-027, RR-025, RR-045, RR-039	Health	Concern regarding impact on mental health and wellbeing	As identified within the **ES Volume 4, Appendix 5.2: Scoping Opinion [APP-098]** a dedicated assessment on Human Health has not been scoped into the DCO Application for the Proposed Development. However, potential impacts on Human Health are assessed, where relevant, in the individual topic chapters and supporting appendices of the Environmental Statement, for

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			example, impacts on mental and physical health and wellbeing to users of the new proposed permissive paths have been considered in **ES Volume 2, Chapter 13: Population [APP-049].**
RR-027, RR-025	Health	Concern regarding impact on physical health	The potential impacts to human health from the Proposed Development during construction, operation (including maintenance) and decommissioning are assessed within **ES Volume 2, Chapter 6: Air Quality [APP-042], ES Volume 2, Chapter 11: Landscape and Visual [APP-047], ES Volume 2, Chapter 12: Noise and Vibration [APP-048],** and **ES Volume 2, Chapter 13: Population [APP-049].** No likely significant effects for human health are reported.
RR-033	Health	Concern regarding toxic chemicals polluting water systems	**ES Volume 4, Appendix 5.5: Water Framework Directive Screening and Scoping Report [EN010157/APP/6.4 Revision 2]** considers the potential effects of the Proposed Development on water quality. During construction, Horizontal Directional Drilling for cable routes to traverse watercourses, there is potential for contaminants such as bentonite to be released to the water environment. An HDD/bentonite breakout plan will be included in the Construction Environmental Management Plan, which will be substantially in accordance with the **Outline CEMP [EN010157/APP/7.2 Revision 2].** With mitigation measures in place, the effects from the new watercourse crossings and Horizontal Directional Drilling would be not significant. Providing measures detailed in and secured by the **Outline CEMP**

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			[EN010157/APP/7.2 Revision 2] and **Outline DEMP [EN010157/APP/7.4 Revision 2]** are implemented to mitigate the risk of adverse effects from surface water runoff during the construction and decommissioning phases, the predicted effects on water quality are considered to be not significant. During operation, the cessation of agricultural activities across the Site would have beneficial effects in terms of runoff rates and water quality. An **Outline BSMP [EN010157/APP/7.6 Revision 2]** sets out the approach to be taken to manage the safety of the BESS in accordance with regulatory requirements, guidance, and good industry practice. The Outline Battery Safety Management Plan will address aspects such as safe design, construction, operation, and disposal and the strategy for firefighting and emergency planning. These managements plans are secured by requirements 4, 15 and 8 of the **Draft DCO [EN010157/APP/3.1 Revision 4].**
RR-027	Health	Concern regarding impact on quality of life	**ES Volume 2, Chapter: 13 Population [APP-049]** outlines the likely effects arising from the construction, operation (including maintenance) and decommissioning of the Proposed Development upon the local population. The chapter concludes that the effects of the Proposed Development on the local population would be not significant, with some of these effects deemed to be Slight beneficial in relation to employment during all phases of the Proposed Development.

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RR-041	Hydrology and Flood Risk	Concern regarding flooding in section B4 due to drain overflow	The Applicant has undertaken site specific modelling to assess the risk of flooding to the site from the Riston Carr Drain to the east of Parcel B4. The site proposals have been derived to mitigate this risk to an acceptable level in accordance with parameters agreed with the Environment Agency which would prevent flooding of panels or water-sensitive infrastructure in a future 1 in 100-year flood. The assessment of risk and approach to mitigation is set out in **ES Volume 4, Appendix 5.6: Flood Risk Assessment [EN010157/APP/6.4 Revision 3].**
RR-041	Hydrology and Flood Risk	Concern regarding extended flooding due to land not being worked	The hydrological impacts of the proposals are discussed in **ES Volume 4, Appendix 5.6: Flood Risk Assessment [EN010157/APP/6.4 Revision 3].** It is expected that the transition of arable fields to year-round grassland cover will lead to an improvement in soil structure, an increase the soil's water holding capacity and a reduction in runoff rates. Although ploughing can lead to a temporary reduction in runoff rates this is in comparison to soil that is typically overworked, compacted and has minimal soil biodiversity.
RR-041	Hydrology and Flood Risk	Concern regarding safety of electric units near Carr House Farm in the event of flooding	The Applicant has undertaken extensive site-specific modelling to assess the risk of flooding to the site from the major water. The units are located outside the modelled future 1 in 100-year flood and will be elevated above the maximum simulated breach flood level. The breaches assume a loss of 50m of bank coinciding with a future 1 in 100-year flood and are therefore and extremely unlikely scenario**.** Details are provided in **ES Volume**

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			4, Appendix 5.6: Flood Risk Assessment [EN010157/APP/6.4 Revision 3].
RR-042	Land areas	Concern regarding the only access to Area B being via road to Carr House Farm	As set out in Table 3-7 in **ES Volume 1, Chapter 3: Proposed Development Description [APP-039]** and shown in **ES Volume 3, Figure 3.5: Indicative Construction Layout Plan [APP-059]**, there would be two access points for the main block of Land Area B. The land to the east of Monk Dike would be accessed via Carr Lane (Long Riston), while the land to the west of Monk Dike would be accessed through Land Area D (via an access point from Meaux Lane). The Applicant has undertaken a transport assessment to assess the potential impacts of the Proposed Development on the local and strategic road network in the surrounding area, as detailed in **ES Volume 2, Chapter 14: Transport and Access [APP-050].** The Proposed Development includes some permanent road improvement to Carr Lane (Long Riston) to ensure safe access into parts of the site. These would take the form of passing places located on sections of public highway considered too narrow. These are shown on **Appendix G of ES Volume 4, Appendix 14.1: Transport Assessment [APP-138].** These passing places would be retained permanently, providing a legacy improvement after construction works have been completed. East Riding of Yorkshire Council has been consulted on these plans.

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RR-041	Land areas	Objection to Land Area B	The Applicant has assessed any potential local impacts on Land Area B during construction, operation (including maintenance), and decommissioning and proposed measures to mitigate them if necessary.
RR-049, RR-027, RR-038, RR-033, RR-046, RR-036, RR-030, RR-026, RR-047, RR-039	Land use	Suggestion that the Proposed Development should be located on unproductive and/or brownfield land	The Applicant acknowledges the importance of balancing energy needs with environmental protection of high-quality land. As such, the Applicant has undertaken assessments of the quality of land included as part of the Proposed Development. The findings of this assessment can be found in **ES Volume 4, Appendix 10.2: Agricultural Land Classification Report [APP-127].** The site selection for a solar farm is led by availability of capacity on the National Grid and the availability of land through agreement. **ES Volume 1, Chapter 4: Alternatives and Design Iteration [APP-040]** provides a detailed account of the site selection process and the subsequent discussions with local landowners about the viability of their land to be provided through voluntary agreement for the Proposed Development.
RR-027	Land use	Concern regarding the loss of PRoWs	The Proposed Development includes a network of new permissive paths as shown on **ES Volume 3, Figure 3.1: Indicative Operational Layout Plan [APP-055].** All PRoW would be kept open during construction as far as is practicable and safe. Where it would not be practicable and safe, there may be a requirement for some PRoW to be temporarily managed or closed for a short duration. More detail on the effects of

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			construction on PRoW users can be found in **ES Volume 2, Chapter 11: Landscape and Visual [APP-047]**, **ES Volume 2, Chapter 13: Population [APP-049]**, **ES Volume 2, Chapter 14: Transport and Access [APP-050]**. An **Outline Rights of Way and Access Management Plan [EN010157/APP/7.9 Revision 2]** has been submitted in support of this DCO application. This sets out a schedule of PRoW within the Proposed Development and outlines the measures to manage any requirements to temporarily close or divert PRoW within the Proposed Development during construction. The production of the final version of the plan is secured by requirement 10 of the **Draft DCO [EN010157/APP/3.1 Revision 4].**
RR-027	Land use	Statement that PRoWs should be kept open	All PRoW would be kept open during construction as far as is practicable and safe. Where it would not be practicable and safe, there may be a requirement for some PRoW to be temporarily managed or closed for a short duration. **ES Volume 2, Chapter 13: Population [APP-049]** considers the impact to users of PRoW and concludes that there are no significant adverse effects as a result of this. During operation (including maintenance) of the Proposed Development all existing PRoW will be retained. The Proposed Development design incorporates a minimum offset distance of 10m from all PRoW including new planting, where reasonably practicable, as secured within the **Works Plans [PDA-004]** and there will be no requirement for temporary or permanent

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			closures of any PRoW during operation (including maintenance). Further detail on retaining and managing PRoW during the operation (including maintenance) phase are outlined in the **Outline Rights of Way and Access Management Plan [EN010157/APP/7.9 Revision 2].** The production of the final version of the plan is secured by requirement 10 of the **Draft DCO [EN010157/APP/3.1 Revision 4].** The Applicant is also proposing to provide a network of new permissive paths which will be available during the operational (including maintenance) phase and are detailed in the **ES Volume 3, Figure 3.4: Indicative Environmental Masterplan [APP-058**] and are secured by the **Outline LEMP [EN010157/APP/7.5 Revision 3]**. The new permissive paths have been designed to retain and enhance recreational connectivity across the Proposed Development. The production of the final version of the plan is secured by requirement 9 of the draft DCO.
RR-033, RR-044, RR-039	Land use	30% of the development area being best and most versatile agricultural land is against government guidelines / Concern regarding the land being best and most versatile farmland	The Applicant acknowledges the range of views expressed in response to the statutory consultation. **ES Volume 4, Appendix 10.2: Agricultural Land Classification Report [APP-127]** provides a summary of the Agricultural Land Classification for each parcel of land which is to be used by the Proposed Development and confirms that approximately 64.9% of the surveyed land falls under the category of lower-quality Subgrade 3b and 4 agricultural land, while 35.1% consists of Best and Most Versatile (BMV) agricultural land (ALC Grades 1-3a), with

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			the majority of that land classed as 3a (For more information on agricultural grading visit Natural England's 'Guide to assessing development proposals on agricultural land' on gov.uk. **ES Volume 2, Chapter 10: Land, Soil and Groundwater [APP-046]** reports that in the East Riding of Yorkshire area, there is estimated to be approximately 172, 403.6 hectares of Best and Most Versatile agricultural land (approximately 73.4% of the total land used for agriculture). The Proposed Development will temporarily impact 712.1 hectares of land (of which 249.9 hectares are Best and Most Versatile agricultural land); with 1.3 hectares of land being permanently lost (none of which is categorised as Best and Most Versatile agricultural land). To demonstrate the context on a regional scale, the amount of Best and Most Versatile agricultural land affected by the Proposed Development that is in the East Riding of Yorkshire area equates to 0.1% of the total Best and Most Versatile agricultural land within the region.
RR-049, RR-027, RR-028, RR-035, RR-030, RR-051, RR-047, RR-045, RR-039	Land use	Concern regarding the industrialisation of countryside	The starting point for the location of the Proposed Development was the availability of the grid connection at National Grid Creyke Beck Substation. Once the grid connection agreement had been secured, the Applicant sought to find land within the surrounding area that was available and suitable for large scale solar deployment, from an irradiance and topography perspective, while also having regard to environmental and planning constraints. Preference was given to land in close

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			proximity to the point of connection at National Grid Creyke Beck Substation. The location, design and layout of the Proposed Development formed part of an iterative process which was informed and shaped by the ongoing environ-mental assessment process, site selection assessment and taking into consideration the project design principles and ongoing engagement and consultation with stakeholders and consultees. Good design influenced every decision, and conservation and enhancement of the local environment sits at the core, of the design approach. Central to this is responding positively to the baseline landscape and the ecosystem services it provides and developing an understanding of what it is that the local community values. The project design principles seek to preserve features of the landscape that contribute to the character and identity of the local area, giving particular consideration to the natural, historic and recreational environment. The Applicant has considered the landscape character of the Order Limits and its relationship with nearby communities, roads and PRoW, to identify the likely effects on the local landscape and visual amenity. To reduce effects on visual amenity, the Applicant has sought to incorporate buffers between the Proposed Development's infrastructure and nearby homes and

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			villages, as well as new planting, where appropriate, to further screen views.
RR-049, RR-027, RR-038, RR-028, RR-044, RR-033, RR-046, RR-036, RR-043, RR-029, RR-040, RR-045, RR-039	Land use	Concern regarding the loss of agricultural land / Statement that the Proposed Development uses too much agricultural land	The Applicant acknowledges the importance of balancing energy needs with environmental protection of high-quality land. As such, the Applicant has undertaken assessments of the quality of land included as part of the Proposed Development. The findings of this assessment can be found in **ES Volume 4, Appendix 10.2: Agricultural Land Classification Report [APP-127]** which provides a summary of the Agricultural Land Classification for each parcel of land which is to be used by the Proposed Development. This confirms that approximately 70% of the surveyed land falls under the category of lower-quality Subgrade 3b and 4 agricultural lands, while 30% consists of Best and Most Versatile (BMV) agricultural land (ALC Grades 1-3a), with the majority of that land classed as 3a (For more information on agricultural grading visit https://www.gov.uk/government/publications/agricultural-landassess-proposals-for-development/guide-to-assessing-development-proposals-onagricultural-land). The UK has a legally binding commitment to achieve net zero carbon emissions by 2050. As one of the cheapest and most rapidly deployable forms of renewable energy, solar will play an important role in achieving this commitment. The UK government has set an expectation of reaching 70GW of installed solar capacity by 2035, a five-fold increase on the

Ref number(s)	Theme	Matter raised	Response
			current installed capacity, and the Proposed Development will make a key contribution towards achieving this ambition. The Proposed Development is a reversible development, and after 40 years will be decommissioned and the land will be reinstated with the exception of retaining environmental mitigation. Over 95% of the solar panel areas can be made available for sheep grazing, retaining an agricultural use and allowing topsoil to recover, by increasing soil organic matter and improving the soil structure. The leases the Applicant has agreed for the Proposed Development grant the landowners the right to graze sheep over the lifetime of the Proposed Development.
RR-027, RR-048, RR-050, RR-045, RR-039	Land use	Concern regarding the loss of countryside	The design of the Proposed Development is expected to protect existing long-range or panoramic views from PRoW wherever reasonably practicable, with only low-level planting in development offsets and hedgerows set further back from the routes. The Proposed Development design is expected to incorporate a minimum offset distance of 10m from all PRoW, including new planting, where reasonably practicable. The Proposed Development will also provide additional opportunities for public recreation, with a network of proposed new permissive paths across the Order Limits.
RR-049, RR-027,	Land use	Mentions of and concern regarding food security	The Applicant acknowledges the importance of balancing energy needs with the protection of high-quality agricultural land. As

Ref number(s)	Theme	Matter raised	Response
RR-038, RR-034, RR-028, RR-044, RR-033, RR-046, RR-036, RR-043, RR-040, RR-039			such, the Applicant has undertaken assessments of the quality of land included as part of the Proposed Development. The findings of this assessment can be found in **ES Volume 4, Appendix 10.2: Agricultural Land Classification Report [APP-127]** which provides a summary of the Agricultural Land Classification for each parcel of land which is to be used by the Proposed Development. This confirms that approximately 64.9% of the surveyed land falls under the category of lower-quality Subgrade 3b and 4 agricultural land, while 35.1% consists of Best and Most Versatile (BMV) agricultural land (ALC Grades 1-3a), with the majority of that land classed as 3a. The Applicant has selected the site and designed the Proposed Development to minimise the use of the best and most valuable land. As part of this, the design sought to utilise existing tracks, crossings and gaps in the hedgerows for access tracks and cable routes wherever practicable. The Government's Food Security Report published in December 2021 is clear that 'the biggest medium to long term risk to the UK's food production comes from climate change and other environmental pressures. The Independent National Food Strategy Review, which looks at the entire food chain from field to fork, concluded that solar farms do not in any way pose a risk to the UK's food security. Additionally, solar farms provide valuable income for farmers, they can still be used for grazing (the leases the Applicant has agreed for the Proposed Development grant the landowners the

Ref number(s)	Theme	Matter raised	Response
			right to graze sheep over the lifetime of the Proposed Development) and can support UK farmers to continue food production on other parts of their land. Further, where a solar farm is installed on land which has been intensively farmed, it enables the ground underneath to re-cover, while providing income for the farming business. Solar farms also help regenerate soil quality and so are helping to ensure the continued availability of high-quality agricultural acreage for future generations.
RR-027, RR-026, RR-045	Land use	Statement that the Proposed Development should not be located on greenfield and/or countryside	The site selection for a solar farm is led by availability of capacity on the National Grid and the availability of land through agreement. **ES Volume 1, Chapter 4: Alternatives and Design Iteration [APP-040]** provides a detailed account of the site selection process and the subsequent discussions with local landowners about the viability of their land to be provided through voluntary agreement for the Proposed Development. The Applicant acknowledges the range of views expressed in response to the statutory consultation. **ES Volume 4, Appendix 10.2: Agricultural Land Classification Report [APP-127]** provides a summary of the Agricultural Land Classification for each parcel of land which is to be used by the Proposed Development. This confirms that approximately 64.9% of the surveyed land falls under the category of lower-quality Subgrade 3b and 4 agricultural lands, while 35.1% consists of Best and Most Versatile (BMV) agricultural land (ALC Grades 1-3a), with the majority of that land classed as 3a (For more information on

Ref number(s)	Theme	Matter raised	Response
			agricultural grading visit https://www.gov.uk/government/publications/agriculturalland-assess-proposals-for-development/guide-toassessing-development-proposals-on-agricultural-land). The UK has a legally binding commitment to achieve net zero carbon emissions by 2050. As one of the cheapest and most rapidly deployable forms of renewable energy, solar will play an important role in achieving this commitment. The UK Government has set an expectation of reaching 70 GW of installed solar capacity by 2035, a fivefold increase on the current installed capacity. This cannot be achieved through rooftop and brownfield solar installations alone, as they have considerable practical barriers of their own. Many domestic and industrial buildings either do not have roofs made of suitable material to support a solar system, do not have the infrastructure to export electricity to the grid, or simply present as an unaffordable solution, with initial costs of installation too high for some. As a result, agricultural land typically of moderate or low quality is also used, without impacting on food security Additionally, solar farms provide valuable income for farmers, they can still be used for grazing and can support UK farmers to continue food production on other parts of their land. The independent National Food Strategy Review shows that solar farms do not in any way present a risk to the UK's food security. Indeed, the reverse is true: the solar industry is working closely with Britain's farmers to reduce their energy costs and improve

Ref number(s)	Theme	Matter raised	Response
			the sustainability of their operations. Further, where a solar farm is installed on land which has been intensively farmed, it enables the ground underneath to recover, while providing income for the farming business. Solar farms also help regenerate soil quality and so are helping to ensure the continued availability of high-quality agricultural acreage for future generations.
RR-049, RR-028, RR-046, RR-036, RR-051, RR-026, RR-032, RR-050, RR-045	Land use	Concerns regarding the size of the Proposed Development	The UK has made a legally binding commitment to achieve net zero carbon emissions by 2050. Reaching net zero means fossil fuels like coal, oil and gas will need to be replaced by sources of clean, low carbon electricity. The Energy Security Strategy (April 2022) set an ambition of 70GW of solar by 2035. The current Labour government made major commitments to the delivery of clean energy in its election manifesto, including to achieve "Clean Power by 2030", including tripling solar power by 2030. Peartree Hill will generate 320 MW of clean energy, enough to power the equivalent of approximately 136,000 homes, and will make an important contribution to helping the UK build a more secure energy system and reach our net-zero target. As set out in NPS EN-3, a solar farm requires between 2 to 4 acres for each MW of output. NPS EN-3 outlines that a typical 50MW solar farm will consist of around 100,000 to 150,000 panels and cover between 125 to 200 acres. Based on this, to achieve the grid connection of 320MW, the Applicant determined that they would need approximately 2,000 acres / 820 ha.

Ref number(s)	Theme	Matter raised	Response
			Further details are provided in **Appendix 2 - Site Selection Assessment to the Planning Statement [APP-147].** Following statutory consultation, solar PV modules have been removed from Land Area A (Land South of High and Low Baswick) following feedback on ecological receptors in the area from statutory parties and the community, as well as the results of flooding and transport assessments, thereby reducing the overall footprint of the Proposed Development. As stated in **ES Volume 1, Chapter 4: Alternatives and Design Iteration [APP-040],** areas discounted from solar PV development during the design process were retained within the Proposed Development for potential mitigation, enhancement or retained agricultural use. The Applicant has sought to distribute solar PV areas across multiple individual land areas, helping to mitigate the overall impacts of the Proposed Development. The Applicant has prepared and submitted a **Design Approach Document [APP-149]** which outlines the approach taken to the design development of the Proposed Development, including how the design has been shaped and influenced by the local landscape, and with local communities and their enjoyment of the local area in mind. The Proposed Development design will include landscaping, habitat management and ecological mitigation/enhancement, which will be refined as the design progresses. Indicative areas

Ref number(s)	Theme	Matter raised	Response
			for planting and for ecological mitigation and enhancement are shown on **ES Volume 3, Figure 3.4: Indicative Environmental Masterplan [APP-058].** Management of habitat creation and enhancement strategies will last throughout the whole operational life of the Proposed Development, as detailed in **Outline LEMP [EN010157/APP/7.5 Revision 3].** The production of the final version of the plan is secured by requirement 9 of the **Draft DCO [EN010157/APP/3.1 Revision 4]**.
RR-046, RR-036, RR-043	Land use	Concern that there has been no full consideration of brownfield sites	The site has been selected through identification of capacity at the Creyke Beck substation for a generation of 320MW. Following the initial search of land surrounding the substation, brownfield sites were initially mapped to ascertain whether there was sufficient land available to support a solar development of 320MW. It was established that there was no such available brownfield land in the local area that was in reasonable distance away from the substation site to allow the development to be commercially viable. **ES Volume 1, Chapter 4: Alternatives and Design Iteration [APP-040]** provides a detailed account of the site selection process and the subsequent discussions with local landowners about the viability of their land to be provided through voluntary agreement for the Proposed Development.
RR-049	Land use	Concern that moderately good land / successful crop	The Applicant acknowledges the importance of balancing energy needs with environmental protection of high-quality land. As such, the Applicant has undertaken assessments of the quality

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		growing land will be eradicated	of land included as part of the Proposed Development. The findings of this assessment can be found in **ES Volume 4, Appendix 10.2: Agricultural Land Classification Report [APP-127]** which provides a summary of the Agricultural Land Classification for each parcel of land which is to be used by the Proposed Development. This confirms that approximately 64.9% of the surveyed land falls under the category of lower-quality Subgrade 3b and 4 agricultural land, while 35.1% consists of Best and Most Versatile (BMV) agricultural land (ALC Grades 1-3a), with the majority of that land classed as 3a (For more information on agricultural grading visit https://www.gov.uk/government/publications/agricultural-landassess-proposals-for-development/guide-to-assessing-development-proposals-onagricultural-land). The UK has a legally binding commitment to achieve net zero carbon emissions by 2050. As one of the cheapest and most rapidly deployable forms of renewable energy, solar will play an important role in achieving this commitment. The UK government has set an expectation of reaching 70 GW of installed solar capacity by 2035, a five-fold increase on the current installed capacity, and the Proposed Development will make a key contribution towards achieving this ambition. The Proposed Development is a reversible development, and after 40 years will be decommissioned and the land will be reinstated with the exception of retaining environmental mitigation.

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			Over 95% of the solar panel areas can be made available for sheep grazing, retaining an agricultural use and allowing topsoil to recover, by increasing soil organic matter and improving the soil structure. The leases the Applicant has agreed for the Proposed Development grant the landowners the right to graze sheep over the lifetime of the Proposed Development.
RR-027	Land use	Statement that current policy needs to be complied with regarding the use of brownfield site / Statement that the local council should present developers with brownfield site options	The Applicant has considered the potential for development on brownfield land within its **Site Selection Assessment** at **Appendix 2 of the Planning Statement [APP-147]**. This considered brownfield sites as set out within the East Riding of Yorkshire Brownfield Register and concluded that there were no brownfield sites of a viable size or location on which to develop a solar farm.
RR-027	Land use	Concern regarding land use changes associated with construction and operation phases	The Applicant acknowledges the importance of balancing energy needs with the protection of agricultural land. As such, the Applicant has undertaken assessments of the quality of land included as part of the Proposed Development. The findings of this assessment can be found in **ES Volume 4, Appendix 10.2: Agricultural Land Classification Report [APP-127]** which provides a summary of the Agricultural Land Classification for each parcel of land which is to be used by the Pro-posed Development. This confirms that approximately 64.9% of the surveyed land falls under the category of lower-quality Subgrade 3b and 4 agricultural land, while 35.1% consists of Best and Most

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			Versatile (BMV) agricultural land (ALC Grades 1-3a), with the majority of that land classed as 3a. The Applicant has selected the site and designed the Proposed Development to minimise the use of the best and most valuable land. As part of this, the design sought to utilise existing tracks, crossings and gaps in the hedgerows for access tracks and cable routes wherever practicable. The Government's Food Security Report published in December 2021 is clear that 'the biggest medium to long term risk to the UK's food production comes from climate change and other environmental pressures. The Independent National Food Strategy Review, which looks at the entire food chain from field to fork, concluded that solar farms do not in any way pose a risk to the UK's food security.
RR-027	Land use	Statement that loss of agricultural land does not align with environmental and societal goals	Section 8.15 of the **Planning Statement [APP-147]** considers the impacts on agricultural land against relevant national policy. NPS EN-3 paragraph 2.10.29 states that the development of large-scale solar PV is not prohibited on agricultural land and that agricultural land classification should not be a predetermining factor in the consideration of DCO Applications.
RR-028	Land use	Concern regarding the cost of importing food	The Government's Food Security Report published in December 2021 is clear that 'the biggest medium to long term risk to the UK's food production comes from climate change and other environmental pressures. The Independent National Food

Ref number(s)	Theme	Matter raised	Response
			Strategy Review, which looks at the entire food chain from field to fork, concluded that solar farms do not in any way pose a risk to the UK's food security. Indeed, the reverse is true: the solar industry is working closely with Britain's farmers to reduce their energy costs and improve the sustainability of their operations. Further, where a solar farm is installed on land which has been intensively farmed, it enables the ground underneath to recover, while providing income for the farming business. Solar farms also help regenerate soil quality and so are helping to ensure the continued availability of high-quality agricultural acreage for future generations.
RR-026	Land use	Statement that smaller scale developments are more tolerable	The Proposed Development has undergone careful consideration to develop the appropriate layout, taking consideration of environmental constraints, landownership and suitable land within a reasonable proximity to National Grid Creyke Beck, which is where the energy generated by the project will feed into the National Electricity Network. More information is in **Appendix 2 - Site Selection Assessment to the Planning Statement [APP-147].**
RR-045	Land use	Statement that use of arable land should be under more scrutiny	The Applicant acknowledges the importance of balancing energy needs with environmental protection of high-quality land and has developed a Proposed Development in line with current Government policy. The Applicant has undertaken assessments of the quality of land included as part of the Proposed Development. The findings of

Ref number(s)	Theme	Matter raised	Response
			this assessment can be found in **ES Volume 4, Appendix 10.2: Agricultural Land Classification Report [APP-127]** which provides a summary of the Agricultural Land Classification for each parcel of land which is to be used by the Proposed Development. This confirms that approximately 64.9% of the surveyed land falls under the category of lower-quality Subgrade 3b and 4 agricultural land, while 35.1% consists of Best and Most Versatile (BMV) agricultural land (ALC Grades 1-3a), with the majority of that land classed as 3a (For more information on agricultural grading visit https://www.gov.uk/government/publications/agricultural-landassess-proposals-for-development/guide-to-assessing-development-proposals-onagricultural-land).
RR-045	Land use	Concern regarding loss of green spaces	The maximum height of the solar panels will be three metres, which is the equivalent of a well-maintained hedgerow. By distributing the Proposed Development across several separate land areas, rather than one large site, the Applicant can more effectively minimise the landscape and visual impact of the Proposed Development. The DCO Application is supported by **ES Volume 2, Chapter 11: Landscape and Visual [APP-047]** which provides an assessment of the impacts and associated mitigation required as a result of the Proposed Development, so that the effects on visual amenity are avoided or reduced wherever practicable. The Applicant has considered the landscape character of the site and

Ref number(s)	Theme	Matter raised	Response
			its relationship with nearby communities to identify the potential effects on the local landscape and visual amenity. The Applicant has also prepared and submitted a **Design Approach Document [APP-149]** which outlines the approach taken to the design development of the Proposed Development, including how the design has been shaped and influenced by the local landscape, and with local communities and their enjoyment of the local area in mind.
RR-044	Land use	Concern site selection was influenced by Dogger Bank South cable route	**Appendix 2: Site Selection Assessment** of the **Planning Statement [APP-147]** provides an overview of the site selection process undertaken by The Applicant. Appended to this is **Appendix 1 Cable Route Corridor Selection** which provides an overview of the cable route selection process. The Dogger Bank South cable route was accounted for in this cable route selection process as would provide engineering deliverability and viability constraints and angle considerations when crossing the cable.
RR-039	Land use	Concern regarding the land being high enough grade to grow animal feed	The Applicant has undertaken assessments, identifying that approximately 64.9% of the surveyed land falls under the category of lower-quality Subgrade 3b and 4 agricultural land, while 35.1% consists of Best and Most Versatile (BMV) agricultural land (ALC Grades 1-3a), with the majority of that land classed as 3a. The Applicant has selected the site and designed the Proposed Development to minimise the use of the best and most valuable land. More information is in **ES Volume**

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			4, Appendix 10.2: Agricultural Land Classification Report [APP-127] which has been prepared for submission in support of the DCO Application. Other embedded mitigation on agricultural land includes optimising existing tracks, crossings and gaps in the hedgerows for access tracks and cable routes wherever practicable, and running cabling alongside access tracks as much as possible to avoid wider excavations
RR-039	Land use	Statement that bridlepaths in the area are not accessible	The DCO Application is supported by the **Outline Rights of Way and Access Management Plan [EN010157/APP/7.9 Revision 2],** secured via Requirement 10 of the **Draft DCO [EN010157/APP/3.1 Revision 4],** which provides details on the management of PRoW including public bridleways, during the construction and operation (including maintenance) of the Proposed Development. During the construction phase of the Proposed Development, with the exception of short, temporary closures/restrictions to facilitate the safe operation of construction works, access to the existing PRoW network will be maintained with appropriate safety measures. This will include temporary fencing or the use of a banksperson, to ensure safe corridors for all users. During the operational (including maintenance) phase of the Proposed Development, internal access tracks will be retained for vehicular access, and during periods of maintenance there may be a requirement for vehicle deliveries and maintenance staff where it may be necessary to temporarily re-introduce

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			some of the management controls implemented during the construction phase. The Proposed Development design incorporates a 10m buffer from all PRoW. Other than exceptional circumstances of maintenance, the existing PRoW and proposed permissive paths will be accessible. During the decommissioning phase, similar management and safety measures will be implemented to those during the construction phase and, where reasonably practicable and safe, the Applicant intends to maintain the accessibility of the PRoW network.
RR-033	Land use	Statement that 46% of the site is medium quality agricultural land that can produce crops / Statement that only 18% of the site is poor quality agricultural land	**ES Volume 4, Appendix 10.2: Agricultural Land Classification Report [APP-127]** provides a summary of the Agricultural Land Classification (ALC) for each parcel of land which is to be used by the Proposed Development. This confirms that approximately 64.9% of the land falls under the category of lower-quality Subgrade 3b and 4 agricultural land, while 35.1% consists of Best and Most Versatile (BMV) agricultural land (ALC Grades 1-3a), with the majority of that land classed as 3a. The soil quality has been assessed using the Institute for Environmental Management and Assessment (IEMA) Guide: A New Perspective on Land and Soil in Environmental Impact Assessment. The Energy Security Secretary Claire Coutinho stated that “We will make sure we reach our solar targets in a sensible way that delivers clean, cheaper energy but does not compromise our

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			food security". This is important as it recognises the need to balance food productivity and solar production. The site has been selected to limit the impact on very high- and high-quality agricultural land. Majority of the land is of medium quality and can be restored back to agricultural use following the decommissioning of the scheme. Additionally, the soil quality will be improved during the operation of the scheme through minimal soil disturbance and grazing which will help improve organic matter, nutrient and water retention.
RR-033	Land use	Statement that there is not adequate evidence for the use of BMV land	The **Site Selection Assessment at Appendix 2 of the Planning Statement [APP-147]** and **ES Volume 1, Chapter 4: Alternatives and Design Iteration [APP-040]** sets out how the site selection process has sought to minimise the impact on best and most versatile (BMV) agricultural land (land classified as Grade 3a and above). Agricultural land is considered necessary to enable the Proposed Development and, where possible, poorer quality agricultural land has been preferred for development over higher quality land, in particular, BMV agricultural land.
RR-033	Land use	Statement that contaminated land should be used	The Applicant acknowledges that policy directs development on land graded 3b, 4 or 5 and to utilise previously developed land, brownfield land, contaminated land or industrial land where possible. Importantly, however, it goes on to state that "land type should not be a predominating factor in determining the suitability of the site location".

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			The **Site Selection Assessment at Appendix 2 of the Planning Statement [APP-147]** and **ES Volume 1, Chapter 4: Alternatives and Design Iteration [APP-040]** sets out how the site selection process has considered alternatives, such as contaminated land, and sought to minimise the impact on best and most versatile (BMV) agricultural land (land classified as Grade 3a and above). The Applicant undertook a systematic process to determine suitable sites. A range of technical, environmental, and economic factors are considered when investigating and assessing any potential site for large-scale solar developments. There were no suitable sites located on contaminated land. As part of the site selection process, consideration was given to previously developed land (PDL)/brownfield sites, commercial rooftops, and lower-quality agricultural land. An assessment of PDL/brownfield land within the wider initial Search Area, which includes parts of Hull and Beverley, identified no land of an adequate land area to facilitate a large-scale solar project either individually or in combination with other sites. An overview of the brownfield sites considered and t commentary on their suitability is available in Chapter 4 of the **Site Selection Assessment at Appendix 2 to the Planning Statement [APP-147].**
RR-033	Land use	Statement that lower quality agricultural land should be used	The Applicant has undertaken assessments, identifying that approximately 64.9% of the surveyed land falls under the category of lower-quality Subgrade 3b and 4 agricultural land, while 30% consists of Best and Most Versatile (BMV) agricultural

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			land (ALC Grades 1-3a), with the majority of that land classed as 3a. The Applicant has selected the site and designed the Proposed Development to minimise the use of the best and most valuable land. More information is in **ES Volume 4, Appendix 10.2: Agricultural Land Classification Report [APP-127]** which has been prepared for submission in support of the DCO Application. Other embedded mitigation on agricultural land includes optimising existing tracks, crossings and gaps in the hedgerows for access tracks and cable routes wherever practicable, and running cabling alongside access tracks as much as possible to avoid wider excavations
RR-033	Land use	Statement that the Proposed Development would increase sheep numbers which is not in line with Climate Change Committee Seventh Carbon Budget	Lifecycle greenhouse gas emissions have been assessed, including those from construction, operation and decommissioning. Land use change emissions are not expected to have a material impact on the total emissions associated with the Proposed Development. Overall, the Proposed Development is anticipated to have a significant beneficial effect on the climate, with 4.1 million tonnes of carbon dioxide equivalent anticipated to be saved over the lifespan of the Proposed Development when compared to Combined Cycle Gas Turbine-generated electricity. The carbon payback period of the Proposed Development has been calculated, which enables the number of years' worth of Greenhouse Gas (GHG) savings from the Proposed Development to be calculated. This is included in the **ES Volume 2, Chapter 8: Climate [APP-044].**

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			Over 95% of the solar panel areas can be made available for sheep grazing and the Applicant has agreed to leases which grant the right to graze sheep over the lifetime of the Proposed Development. The benefits of facilitating sheep grazing include continued agricultural use and benefits for soil organic matter and structure.
RR-033	Land use	Suggestion to locate the Proposed Development on grassland that is used to graze animals	The Applicant estimates that around 95% of land within the Site could be grazed by sheep, should the landowners wish to use the land in this way.
RR-027	Land, Soil and Groundwater	Concern regarding impact on soil due to not being turned annually	By the soil not being turned annually the soil will be given an opportunity to establish mycorrhizal fungi and a complex root network. Mycorrhizal fungi is a key component of soil health as it helps improve water and retention. Mycorrhiza is a root like network of mycelium that interconnects roots within the soil. The recent research on mycorrhizal fungi has shown an increase importance of the network to establish a healthy soil. When soil is turned the mycelium network are broken which limits a soils nutrient and water retention. Turning a soil annually does not improve soil health it limits the soils biological and chemical pathways and effects the established ecosystem, therefore by the soil not being turned it will improve soil health and ecosystems.

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RR-027	Land, Soil and Groundwater	Concern regarding impact of soil integrity due to lack of crops to absorb water	The soil will be under a permanent grassland so will not be left are. The grassland will be established and grazed for the duration of the scheme. The established grassland will help increase water absorption by providing a cover for the soil preventing erosion and runoff. Additionally, by the grassland being established and not undergoing crop rotation the soil organic matter and mycorrhizal fungi will be increased which are both vital to soil water retention.
RR-049	Landscape and Visual	Concern regarding the loss of view of Beverley Minster	The DCO Application is supported by **ES Volume 2, Chapter 11: Landscape and Visual [APP-047]** which provides an assessment of the impacts and associated mitigation required as a result of the Proposed Development, so that the effects on visual amenity are avoided or reduced wherever practicable. The Applicant has considered the landscape character of the site and its relationship with nearby communities to identify the potential effects on the local landscape and visual amenity. The maximum height of the solar PV panels is three metres, which is the equivalent of a well-maintained hedgerow. The Applicant has also prepared and submitted a **Design Approach Document [APP-149]** which outlines the approach taken to the design development of the Proposed Development, including how the design has been shaped and influenced by the local landscape, and with local communities and their enjoyment of the local area in mind. **ES Volume 2, Chapter 9: Cultural Heritage [EN010157/APP/6.2 Revision 2]** identifies the likely significant effects the Proposed Development may have on the local

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			historic environment, including identified and potential archaeology and cultural heritage features such as listed buildings, scheduled monuments and conservation areas. Where impacts have been identified, mitigation measures have been proposed as part of the Proposed Development. As set out in **ES Volume 2, Chapter 11: Landscape and Visual [APP-047],** there are no vistas of Beverley Minster identified in any published landscape character assessment or the East Riding Local Plan 2012 – 2029 (adopted April 2016). In addition, field work, as evidenced by the viewpoints included in **ES Volume 4, Appendix 11.6: Viewpoints and Visualisations [AS-001 and AS-002],** confirms that the Proposed Development would not impact views of the Minster, although the Minster itself is visible on clear days from some locations within the Site. Therefore, this receptor was scoped out of full assessment in the above chapter.
RR-027, RR-048, RR-050, RR-045, RR-039 RR-049	Landscape and Visual	Concern regarding the visual impact on the appearance of the area / Statement that the Proposed Development looks awful	The DCO Application is supported by **ES Volume 2, Chapter 11: Landscape and Visual [APP-047]** which provides an assessment of the impacts and associated mitigation required as a result of the Proposed Development, so that the effects on visual amenity are avoided or reduced wherever practicable. The Applicant has considered the landscape character of the site and its relationship with nearby communities to identify the potential effects on the local landscape and visual amenity. The maximum height of the solar PV panels is three metres, which is the equivalent of a well-maintained hedgerow.

Ref number(s)	Theme	Matter raised	Response
			To reduce effects on visual amenity, the Applicant has sought to incorporate buffers between the Proposed Developments infrastructure and nearby homes and villages, as well as new planting, where appropriate, to further screen views. Further details can be found in **ES Volume 2, Chapter 11: Landscape and Visual [APP-047]** and the **Outline LEMP [EN010157/APP/7.5 Revision 3].** Schedule 9 to the Draft DCO secures the submission, approval and implementation of the Landscape and Ecological Management Plan, which must be substantially in accordance with the **Outline LEMP [EN010157/APP/7.5 Revision 3].**
RR-026 RR-027, RR-034, RR-035, RR-039 RR-042, RR-045, RR-048, RR-049	Landscape and Visual	Concern regarding loss of views / Concern regarding visual impact on open landscape / Concern regarding damage to landscape	The maximum height of the solar panels will be 3m, which is the equivalent of a well-maintained hedgerow. By distributing the Proposed Development across several separate land areas, rather than one large site, the Applicant can more effectively minimise the landscape and visual impact of the Proposed Development. The DCO Application is supported by **ES Volume 2, Chapter 11: Landscape and Visual [APP-047]** which provides an assessment of the impacts and associated mitigation required as a result of the Proposed Development, so that the effects on visual amenity are avoided or reduced wherever practicable. The Applicant has considered the landscape character of the Site and its relationship with nearby communities to identify the potential effects on the local landscape and visual amenity. The Applicant has also prepared and submitted a **Design Approach Document [APP-149]** which

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			outlines the approach taken to the design development of the Proposed Development, including how the design has been shaped and influenced by the local landscape, and with local communities and their enjoyment of the local area in mind.
RR-034, RR-039	Landscape and Visual	Concern regarding the loss of amenity of open countryside	The Applicant has prepared and submitted a **Design Approach Document [APP-149]** which outlines the approach taken to the design development of the Proposed Development, including how the design has been shaped and influenced by the local landscape, and with local communities and their enjoyment of the local area in mind. The Proposed Development design is expected to protect existing long-range or panoramic views from PRoW wherever reasonably practicable, with only low-level planting in development offsets and hedgerows set further back from the routes. The Proposed Development design is expected to incorporate a minimum offset distance of 10m from all PRoW, including new planting, where reasonably practicable. The Proposed Development will also provide additional opportunities for public recreation, with a network of proposed new permissive paths across the site.
RR-027, RR-044, RR-040, RR-039	Landscape and Visual	Statement that the Proposed Development is too large	The UK has made a legally binding commitment to achieve net zero carbon emissions by 2050. Reaching net zero means fossil fuels like coal, oil and gas will need to be replaced by sources of clean, low carbon electricity. The Energy Security Strategy (April 2022) set an ambition of 70GW of solar by 2035. The current Labour government made major commitments to the delivery of

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			clean energy in its election manifesto, including to achieve "Clean Power by 2030", including tripling solar power by 2030. Peartree Hill will generate 320MW of clean energy, enough to power the equivalent of approximately 136,000 homes, and will make an important contribution to helping the UK build a more secure energy system and reach our net-zero target. As set out in NPS EN-3, a solar farm requires between 2 to 4 acres for each MW of output. NPS EN-3 outlines that a typical 50MW solar farm will consist of around 100,000 to 150,000 panels and cover between 125 to 200 acres. Based on this, to achieve the grid connection of 320 MW, the Applicant determined that they would need approximately 2,000 acres / 820 ha. Further details are provided in **Appendix 2 - Site Selection Assessment to the Planning Statement [APP-147].** Since statutory consultation, solar PV modules have been removed from Land Area A (Land South of High and Low Baswick) following feedback on ecological receptors in the area from statutory parties and the community, as well as the results of flooding and transport assessments, thereby reducing the overall footprint of the Proposed Development. As stated in **ES Volume 1, Chapter 4: Alternatives and Design Iteration [APP-040],** areas discounted from solar PV development during the design process were retained within the Proposed Development for potential mitigation, enhancement or retained agricultural use. The Applicant has sought to distribute solar PV areas across multiple individual land areas, helping to

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			mitigate the overall impacts of the Proposed Development. The Applicant has prepared and submitted a **Design Approach Document [APP-149]** which outlines the approach taken to the design development of the Proposed Development, including how the design has been shaped and influenced by the local landscape, and with local communities and their enjoyment of the local area in mind. The Proposed Development design will include landscaping, habitat management and ecological mitigation/enhancement, which will be refined as the design progresses. Indicative areas for planting and for ecological mitigation and enhancement are shown on **ES Volume 3, Figure 3.4: Indicative Environmental Masterplan [APP-058].** Management of habitat creation and enhancement strategies will last throughout the whole operational life of the Proposed Development, as detailed in **Outline LEMP [EN010157/APP/7.5 Revision 3]** and secured via Requirement 9 of the **Draft DCO [EN010157/APP/3.1 Revision 4].**
RR-032, RR-039	Landscape and Visual	Concern regarding loss of rural heritage	The UK has made a legally binding commitment to achieve net zero carbon emissions by 2050. Reaching net zero means fossil fuels like coal, oil and gas will need to be replaced by sources of clean, low carbon electricity. The Government's Energy Security Strategy proposes that by 2035, 100% of electricity be delivered through low carbon sources produced in the UK – with 70GW of this power delivered through solar. The Proposed Development will generate 320MW of clean energy, enough to power the equivalent of approximately 136,000 homes, and will make an

Ref number(s)	Theme	Matter raised	Response
			important contribution to helping the UK build a more secure energy system and reach our net-zero target. The site selection for a solar farm is led by availability of capacity on the National Grid and the availability of land through agreement. **ES Volume 1, Chapter 4: Alternatives and Design Iteration [APP-040]** provides a detailed account of the site selection process and the subsequent discussions with local landowners about the viability of their land to be provided through voluntary agreement for the Proposed Development. The site used for the Proposed Development can continue to contribute to local agriculture. Over 95% of the solar panel areas can be made available for sheep grazing, retaining an agricultural use and allowing topsoil to recover, by increasing soil organic matter and improving the soil structure. The leases the Applicant has agreed on the solar land grant the landowners the right to graze sheep over the life of the Proposed Development. The Applicant has also prepared and submitted a **Design Approach Document [APP-149]** which outlines the approach taken to the design development of the Proposed Development, including how the design has been shaped and influenced by the local landscape, and with local communities and their enjoyment of the local area in mind.
RR-049, RR-034, RR-044	Landscape and Visual	Concern regarding the loss of rural characteristics of the area	The maximum height of the solar panels will be three metres, which is the equivalent of a well-maintained hedgerow. By distributing the Proposed Development across several separate land areas, rather than one large site, the Applicant can more effectively minimise the landscape and visual impact of the

Ref number(s)	Theme	Matter raised	Response
			Proposed Development. The DCO Application is supported by **ES Volume 2, Chapter 11: Landscape and Visual [APP-047]** which provides an assessment of the impacts and associated mitigation required as a result of the Proposed Development, so that the effects on visual amenity are avoided or reduced wherever practicable. The Applicant has considered the landscape character of the Site and its relationship with nearby communities to identify the potential effects on the local landscape and visual amenity. The Applicant has also prepared and submitted a **Design Approach Document [APP-149]** which outlines the approach taken to the design development of the Proposed Development, including how the design has been shaped and influenced by the local landscape, and with local communities and their enjoyment of the local area in mind.
RR-032 RR-039 RR-042 RR-044 RR-049	Landscape and Visual	Concern regarding light pollution on dark skies / Concern regarding light pollution	The construction and operational lighting associated with the Proposed Development will be restricted and designed sensitively with the environment in mind therefore it is unlikely to pose an issue. Furthermore, operational lighting would be infrared security lighting so would only be triggered on movement. Therefore, lighting would not be permanently on throughout the night. As the Proposed Development is not located in a Dark Sky designation it's unlikely to have an effect on this as a receptor. The DCO Application is supported by **ES Volume 2, Chapter 11: Landscape and Visual [APP-047],** which provides justification for scoping out the lighting impacts on landscape character and visual amenity.

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			Construction stage lighting would be limited to that required for safety reasons and any potential effects would be managed in line with the **Outline CEMP [EN010157/APP/7.2 Revision 2].** The detailed Construction Environmental Management Plan is secured via Requirement 4 of **the Draft DCO [EN010157/APP/3.1 Revision 4]** and must be approved by East Riding of Yorkshire Council prior to construction commencing and will be substantially in accordance with the **Outline CEMP [EN010157/APP/7.2 Revision 2]**. The only operational lighting required would be sensor triggered security lighting around key electrical infrastructure, and so the Proposed Development would not be continuously lit. Information on lighting is provided in **ES Volume 1, Chapter 3: Proposed Development Description [APP-039]** and the **Outline CEMP [EN010157/APP/7.2 Revision 2]** and **Outline OEMP [APP-154].** Provided the measures recommended in the **Outline CEMP [EN010157/APP/7.2 Revision 2]** are implemented, it is not anticipated that significant adverse effects on light pollution would arise due to lighting at any receptors. Given the limited lighting requirements and with the application of good practice mitigation, further assessment and monitoring is not proposed.
RR-039	Landscape and Visual	Statement that dark skies must be protected in Arnold and /or Long Riston	The DCO Application is supported by **ES Volume 2, Chapter 11: Landscape and Visual [APP-047],** which provides justification for scoping out the lighting impacts on landscape character and visual amenity. The construction and operational lighting associated with the Proposed Development will be

Ref number(s)	Theme	Matter raised	Response
			restricted and designed sensitively with the environment in mind therefore it is unlikely to pose an issue. Furthermore, operational lighting would be infrared security lighting so would only be triggered on movement. Therefore, lighting would not be permanently on throughout the night. As the Proposed Development is not located in a Dark Sky designation it's unlikely to have an effect on this as a receptor. Information on lighting is provided in **ES Volume 1, Chapter 3: Proposed Development Description [APP-039]** and the **Outline CEMP [EN010157/APP/7.2 Revision 2]** and **Outline OEMP [EN010157/APP/7.3 Revision 2].** Provided the measures recommended in the **Outline CEMP [EN010157/APP/7.2 Revision 2]** are implemented, it is not anticipated that significant adverse effects on light pollution would arise due to lighting at any receptors. Given the limited lighting requirements and with the application of good practice mitigation, further assessment and monitoring is not proposed. The Construction Environmental Management Plan is secured via Requirement 4 of the **Draft DCO [EN010157/APP/3.1 Revision 4]** and must be approved by East Riding of Yorkshire Council prior to construction commencing and will be substantially in accordance with the **Outline CEMP [EN010157/APP/7.2 Revision 2]**.
RR-049, RR-028	Landscape and Visual	Concern regarding the visual impact for footpath and road users	The DCO Application is supported by **ES Volume 2, Chapter 11: Landscape and Visual [APP-047]** which provides an assessment of the impacts and associated mitigation required as a result of the Proposed Development, so that the effects on

Ref number(s)	Theme	Matter raised	Response
			visual amenity are avoided or reduced wherever practicable. The Applicant has considered the landscape character of the site and its relationship with nearby communities to identify the potential effects on the local landscape and visual amenity. The maximum height of the solar PV panels is three metres, which is the equivalent of a well-maintained hedgerow. The Applicant has also prepared and submitted a **Design Approach Document [APP-149]** which outlines the approach taken to the design development of the Proposed Development, including how the design has been shaped and influenced by the local landscape, and with local communities and their enjoyment of the local area in mind. The Proposed Development design is expected to protect existing long-range or panoramic views from PRoW wherever reasonably practicable, with only low-level planting in development offsets and hedgerows set further back from the routes. The Proposed Development design is expected to incorporate a minimum offset distance of 10m from all PRoW, including new planting, where reasonably practicable. The Proposed Development will also providing additional opportunities for public recreation, with a network of proposed new permissive paths across the site.
RR-027, RR-026	Landscape and Visual	Concern regarding the visual impact of fencing	A perimeter security fence would be installed to enclose the operational areas of the Proposed Development. The fence is likely to be either a wire-mesh or deer fence, measuring up to 2m in height. The fence would be designed in such a way to allow small animals to pass through the Proposed Development

Ref number(s)	Theme	Matter raised	Response
			and would also be gated to allow access to and from the Proposed Development. Palisade fencing would be installed around the perimeter of the on-site substation compounds. Palisade fencing is made of steel rails attached to horizontal-running rails, connected to vertical steel joints. The fencing would be up to 2m in height. These parameters are secured by the **Design Parameters Document [EN010157/APP/5.8 Revision 2]**. The DCO Application is supported by **ES Volume 2, Chapter 11: Landscape and Visual [APP-047]** which provides an assessment of the impacts and associated mitigation required as a result of the Proposed Development, so that the effects on visual amenity are avoided or reduced wherever practicable. The Applicant has considered the landscape character of the site and its relationship with nearby communities to identify the potential effects on the local landscape and visual amenity.
RR-049, RR-027	Landscape and Visual	Concern regarding the visual impact of infrastructure associated with the Proposed Development	The Applicant has prepared and submitted a **Design Approach Document [APP-149]** which outlines the approach taken to the design development of the Proposed Development, including how the design has been shaped and influenced by the local landscape, and with local communities and their enjoyment of the local area in mind. The DCO Application is supported by **ES Volume 2, Chapter 11: Landscape and Visual [APP-047]** which provides an assessment of the impacts and associated mitigation required as a result of the Proposed Development, so that the effects on visual amenity are avoided or reduced

Ref number(s)	Theme	Matter raised	Response
			wherever practicable. The Applicant has considered the landscape character of the site and its relationship with nearby communities to identify the potential effects on the local landscape and visual amenity. Details of the proposed heights of the infrastructure are included in the **Design Parameters Document [EN010157/APP/5.8 Revision 2].**
RR-049	Landscape and Visual	Concern regarding the visual impact of the substation	The two on-site substations would be located within Land Areas C and E, as shown in **ES Volume 3, Figure 3.1: Indicative Operational Layout Plan [APP-055].** The on-site substations would be sized as 180 megavolt-amperes (MVA). The substation compounds would be up to 60m in length and 110 m in width. The equipment within the substations would have a maximum height of 15m (this would only relate to a communications tower, with the maximum height of the other equipment within the substation being 8m). The Applicant has prepared and submitted a **Design Approach Document [APP-149]** which outlines the approach taken to the design development of the Proposed Development, including how the design has been shaped and influenced by the local landscape, and with local communities and their enjoyment of the local area in mind. The DCO Application is supported by **ES Volume 2, Chapter 11: Landscape and Visual [APP-047]** which provides an assessment of the impacts and associated mitigation required as a result of the Proposed Development, so that the effects on visual amenity are avoided or reduced wherever practicable. The Applicant has considered the landscape character of the site and

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			its relationship with nearby communities to identify the potential effects on the local landscape and visual amenity.
RR-025	Landscape and Visual	Statement that effective screening is needed	The DCO Application is supported by **ES Volume 2, Chapter 11: Landscape and Visual [APP-047]** which provides an assessment of the impacts and associated mitigation required as a result of the Proposed Development, so that the effects on visual amenity are avoided or reduced wherever practicable. The Applicant has considered the landscape character of the site and its relationship with nearby communities to identify the potential effects on the local landscape and visual amenity. Landscaping, including new hedgerow and tree planting is proposed to avoid or minimise significant environmental effects. Planting, including mitigation planting, is expected to be delivered from the earliest stages of the Proposed Development in order to maximise biodiversity value, screening and other environmental benefits. By year 10 hedgerows would have been allowed to grow to a height of 3.5m and any existing gaps in the hedgerows infilled. These measures are presented and secured in the **Outline LEMP [EN010157/APP/7.5 Revision 3]**. This would have the effect of largely screening the Proposed Development as far as possible to mitigate any significant visual effects on views due to the development. Proposed mitigation measures, including proposed screening of the Proposed Development, are presented in the **Outline LEMP [EN010157/APP/7.5 Revision 3]**. The Landscape and

Ref number(s)	Theme	Matter raised	Response
			Ecological Management Plan is secured by Requirement 9 of the **Draft DCO [EN010157/APP/3.1 Revision 4]**. Refer to **ES Volume 2, Chapter 11: Landscape and Visual [APP-047]** for further details.
RR-028	Landscape and Visual	Statement that the Proposed Development is too spread out	The site selection for a solar farm is led by availability of capacity on the National Grid and the availability of land through agreement. **ES Volume 1, Chapter 4: Alternatives and Design Iteration [APP-040]** provides a detailed account of the site selection process and the subsequent discussions with local landowners about the viability of their land to be provided through voluntary agreement for the Proposed Development. While the site selection is guided by the site selection process, it is also critical that the Applicant seeks to minimise impacts of the underground cable connections between Land Areas, meaning solar areas should not be too far from each other. As stated in **ES Volume 1, Chapter 4: Alternatives and Design Iteration [APP-040],** areas discounted from solar PV development during the design process were retained within the Proposed Development for potential mitigation, enhancement or retained agricultural use.
RR-049, RR-027	Landscape and Visual	Concern regarding the height of panels	The height of the panels has been assessed fully in **ES Volume 2, Chapter 11: Landscape and Visual [APP-047].**

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			The Applicant has considered the potential effects on visual amenity in detail on receptors including local settlements and users of the PRoW network. **ES Volume 4, Appendix 11.6: Viewpoints and Visualisations [AS-001 and AS-002]** includes annotated viewpoints from 27 locations around the study area (varying between a 90 degree and 360-degree field of view) and photomontage visualisations from eight of those viewpoints. Mitigation is proposed, such as hedgerow planting, to protect the visual amenity, to screen the panels from view as far as reasonably practicable. Proposed mitigation measures, including hedgerow planting and management, are presented and secured in the **Outline LEMP [EN010157/APP/7.5 Revision 3]**. The Landscape and Ecological Management Plan is secured by Requirement 9 of the **Draft DCO [EN010157/APP/3.1 Revision 4]**.
RR-049	Landscape and Visual/ Heritage	Concern regarding loss of view of St Mary's church	**ES Volume 2, Chapter 11: Landscape and Visual [APP-047]** provides an assessment of the impacts and associated mitigation required as a result of the Proposed Development, so that the effects on visual amenity are avoided or reduced wherever practicable. The Applicant has considered the potential effects on visual amenity in detail on receptors including local settlements and users of the PRoW network. **ES Volume 4, Appendix 11.6: Viewpoints and Visualisations [AS-001 and AS-002]** includes annotated viewpoints from 27 locations around the study area (varying between a 90 degree and 360-degree

Ref number(s)	Theme	Matter raised	Response
			field of view) and photomontage visualisations from eight of those viewpoints. It is noted that St Mary's Church is not visible within any of the 27 viewpoints. Furthermore, thorough site survey work was undertaken during the assessment process, and the church was never the focus of any views around the landscape. It is also noted that the maximum height of the solar PV panels is 3m, which is the equivalent of a well-maintained hedgerow. It is acknowledged that there may potentially be very occasional locations, from publicly accessible areas, where the tower of St Mary's Church and elements of solar PV development are visible simultaneously, but these would be rare. Table 11-10: Embedded mitigation relevant to landscape and visual amenity of **ES Volume 2, Chapter 11: Landscape and Visual [APP-047]** explains *"The Proposed Development design will protect existing long-range or panoramic views from public rights of way wherever reasonably practicable, with only low-level planting in development offsets and hedgerows set further back from the routes"*, and that this is secured by the **Outline LEMP [EN010157/APP/7.5 Revision 3]** via Requirement 9 of the **Draft DCO [EN010157/APP/3.1 Revision 4].**
RR-041	Landscape and Visual	Statement that section B4 blocks view	**ES Volume 2, Chapter 11: Landscape and Visual [APP-047]** provides an assessment of the impacts and associated mitigation required as a result of the Proposed Development, so that the effects on visual amenity are avoided or reduced

Ref number(s)	Theme	Matter raised	Response
			wherever practicable. The Applicant has considered the potential effects on visual amenity in detail on receptors including local settlements and users of the PRoW network, including the PRoW adjacent to Field B4. Viewpoint 10 within **ES Volume 4 Appendix 11.6: Viewpoints and Visualisations [AS-001 and AS-002]** is located adjacent to Field B4 and illustrates a 360-degree field of view, with photomontage visualisations at Years 1 and 10 of operation. It is acknowledged that initially solar PV modules, and subsequently the proposed hedgerow planting, would restrict views of the adjacent agricultural field, Field B4.
RR-041	Landscape and Visual	Statement that section B1 and B7 block views towards Beverley / Beverley Minster	**ES Volume 2, Chapter 11: Landscape and Visual [APP-047]** provides an assessment of the impacts and associated mitigation required as a result of the Proposed Development, so that the effects on visual amenity are avoided or reduced wherever practicable. The Applicant has considered the potential effects on visual amenity in detail on receptors including local settlements and users of the PRoW, including the PRoW adjacent to Fields B1 and B7. Viewpoint 10 within **ES Volume 4 Appendix 11.6: Viewpoints and Visualisations [AS-001 and AS-002]** is located adjacent to Field B1 (though separated by Monk Dike) and illustrates a 360-degree field of view, with photomontage visualisations at Years 1 and 10 of operation. Viewpoint 10 would also be representative of views west across Field B7 and Viewpoint 15 is also representative of views west from adjacent to Monk Dike, similar to the views west across Fields B1 and B7.

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			It is acknowledged that initially solar PV modules, and subsequently the proposed hedgerow planting, would block views of the existing agricultural field. However, due to the offset from the solar PV modules created by Monk Dike and the raised location of the embankment, longer distance views towards Beverley would not be blocked (see Viewpoint 10c Monk Dike (north), PRoW Riston Footpath no. 2 - Photomontage (Year 10) within **ES Volume 4 Appendix 11.6: Viewpoints and Visualisations [AS-001 and AS-002]**, which illustrates this point. In addition, it is noted that Beverley Minster is located 8km south-west of the PRoW adjacent to Fields B1 and B7 and was never visible during the site survey work, which including walking this PRoW six times. Table 11-10: Embedded mitigation relevant to landscape and visual amenity of **ES Volume 2, Chapter 11: Landscape and Visual [APP-047]** explains *"The Proposed Development design will protect existing long-range or panoramic views from public rights of way wherever reasonably practicable, with only low-level planting in development offsets and hedgerows set further back from the routes"*, and that this is secured by the **Outline LEMP [EN010157/APP/7.5 Revision 3]**.
RR-041	Landscape and Visual	Concern that proposed hedgerows will block views	**ES Volume 2, Chapter 11: Landscape and Visual [APP-047]** provides an assessment of the impacts and associated mitigation required as a result of the Proposed Development, so that the effects on visual amenity are avoided or reduced wherever practicable. The DCO is also accompanied by **ES**

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			Volume 3, Figure 3.4: Indicative Environmental Masterplan [APP-058] which illustrates the planting proposals around the Order Limits, which include new hedgerow planting. There are locations where the new hedgerow planting would restrict some views: these would primarily be of what are currently adjacent agricultural fields. However, the purpose of the planting is to screen potential views of the solar PV modules, and this planting is considered to be appropriate for the Proposed Development. In addition to the visual screening benefits, all the proposed embedded mitigation measures provide landscape and biodiversity benefits and help meet the following recorded landscape ambitions: New hedgerow planting and gapping up of existing hedgerows, together with the introduction of Biodiversity Enhancement Areas, assist the Statements of Environmental Opportunity 2 as detailed in the National Character Area Profile 40: Holderness which states "*Work with landowners and land managers to support sustainable food production while enhancing and strengthening the network of farmland features; create and expand habitats in the farmed environment to enhance biodiversity and improve soil and water quality; strengthen resilience of habitats to climate change; and enhance landscape character*";

Ref number(s)	Theme	Matter raised	Response
			New hedgerow planting and gapping up of existing hedgerows assist the strategy for LCT19: Open Farmland as detailed in East Riding of Yorkshire Landscape Character Assessment, which states *"Field pattern makes an important contribution to character and should be maintained and where possible reinforced. Promote hedgerow replanting and gapping up and discourage the further amalgamation of fields"*.
RR-041	Landscape and Visual	Concern that hedgerows will take a long time to become established	The assumed growth rates for newly planted hedgerows are detailed in **ES Volume 4, Appendix 11.1: Landscape and Visual Impact Assessment Methodology [APP-128]**, where it states: *"Newly planted hedgerows and woodland/shrub would be planted as young transplants or 'whips'. In Year 1 after construction the planting stock would typically be approximately 0.6m to 0.8m high and contained within tree protected tubes.* *Hedgerows in Year 10 would be 3.5m in height. This makes an assumption that the plants do not put on much growth in the first planting season and then put on an average of 0.4m growth each subsequent year. This means that all new hedgerows are considered to be at full maturity in Year 10 and are maintained at 3.5m by ongoing management."* Detailed information on how new vegetation will be managed and monitored is provided in the **Outline LEMP [EN010157/APP/7.5 Revision 3]** and is secured via

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			Requirement 9 of the **Draft DCO [EN010157/APP/3.1 Revision 4].**
RR-041	Landscape and Visual	Concern that proposed hedgerows may die in dry conditions	Detailed information on how new vegetation will be managed and monitored is provided in the **Outline LEMP [EN010157/APP/7.5 Revision 3]**. Table 10-3: Proposed maintenance of native hedgerow planting confirms the monitoring, maintenance and replacement of new hedgerow planting within the first five years, at which point the hedgerows would be considered to have established.
RR-025	Landscape and Visual	Statement that sections E15 and E16 will cause loss of view	**ES Volume 2, Chapter 11: Landscape and Visual [APP-047]** provides an assessment of the impacts and associated mitigation required as a result of the Proposed Development, so that the effects on visual amenity are avoided or reduced wherever practicable. The Applicant has considered the potential effects on visual amenity in detail on receptors including local settlements and users of the PRoW network, including the PRoW adjacent to Field B4. Viewpoint 26 within **ES Volume 4 Appendix 11.6: Viewpoints and Visualisations [AS-001 and AS-002]** is located adjacent to Field E15 and illustrates a 180-degree field of view, with photomontage visualisations at Years 1 and 10 of operation. It is acknowledged that initially solar PV modules, and subsequently the proposed hedgerow planting, would restrict views of the adjacent agricultural field. However, it is noted that any 'loss' of view would be limited to a short section of track

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			adjacent to the north of Fields E15 and E17 only. The proposed hedgerows, once mature, would be in keeping with the existing views around the landscape in this location. Development within Fields E15 and E16 would not cause the loss of any views from within the village of Weel or from PRoWs.
RR-025	Landscape and Visual	Statement that further discussion is required in relation to screening	**ES Volume 2, Chapter 11: Landscape and Visual [APP-047]** provides an assessment of the impacts and associated mitigation required as a result of the Proposed Development, so that the effects on visual amenity are avoided or reduced wherever practicable. The DCO is also accompanied by **ES Volume 3, Figure 3.4: Indicative Environmental Masterplan [APP-058]** which illustrates the planting proposals around and within the Order Limits. Table 11-10: Embedded mitigation relevant to landscape and visual amenity of **ES Volume 2, Chapter 11: Landscape and Visual [APP-047]** details where proposed mitigation measures are located and the function of each piece of mitigation, for example, "*to soften views and provide screening of views from…".* It is considered that the embedded mitigation proposals provide a high level of visual screening within and around the Order Limits, to ensure that once established, the solar PV development would be visually well contained from local receptors. As set out in the draft **Statement of Common Ground with East Riding of Yorkshire Council [EN010157/APP/9.2]**, East

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			Riding of Yorkshire Council's landscape consultants were satisfied with the extent and design of proposed screening planting following amendments after a joint site walkover on 28 August 2024. The Applicant is open to further discussion on screening with relevant parties and would encourage the stakeholder to outline issues in more detail within future oral or written representation submissions during the examination.
RR-025	Landscape and Visual	Statement that invertors should be adequately screened	**ES Volume 2, Chapter 11: Landscape and Visual [APP-047]** provides an assessment of the impacts and associated mitigation required as a result of the Proposed Development, so that the effects on visual amenity are avoided or reduced wherever practicable. The DCO Application is also accompanied by **ES Volume 3, Figure 3.4: Indicative Environmental Masterplan [APP-058]** which illustrates the planting proposals around and within the Order Limits. Fields hosting solar PV modules also include ancillary equipment including inverters, transformers and switchgear. The proposed new vegetation is located around the periphery of fields and not individual elements of infrastructure. Therefore, the proposed planting proposals also screen the inverters. Table 11-10: Embedded mitigation relevant to landscape and visual amenity of **ES Volume 2, Chapter 11: Landscape and Visual [APP-047]** details where proposed mitigation measures are located and the function of each piece of mitigation, for

Ref number(s)	Theme	Matter raised	Response
			example, "*to soften views and provide screening of views from…".* It is considered that the embedded mitigation proposals provide a high level of visual screening within and around the Order Limits, to ensure that once established, the Proposed Development would be visually well contained from local receptors.
RR-050	Landscape and Visual	Concern that hedgerows will not provide sufficient screening	**ES Volume 2, Chapter 11: Landscape and Visual [APP-047]** provides an assessment of the impacts and associated mitigation required as a result of the Proposed Development, so that the effects on visual amenity are avoided or reduced wherever practicable. The DCO is also accompanied by **ES Volume 3, Figure 3.4: Indicative Environmental Masterplan [APP-058]** which illustrates the planting proposals around the Order Limits, which include new hedgerow planting. Hedgerow and tree planting has been incorporated wherever feasible and appropriate to screen the Proposed Development from local receptors, in consultation with East Riding of Yorkshire Council. In some locations new hedgerow planting would not be appropriate e.g. within the centre of agricultural fields (so as not to sterilise the fields against future agricultural use). Table 11-10: Embedded mitigation relevant to landscape and visual amenity of **ES Volume 2, Chapter 11: Landscape and Visual [APP-047]** details where proposed mitigation measures are located and the function of each piece of mitigation, for

Ref number(s)	Theme	Matter raised	Response
			example, "*to soften views and provide screening of views from…".* It is considered that the embedded mitigation proposals provide a high level of visual screening within and around the Order Limits, to ensure that once established, the solar PV development would be visually well contained from local receptors.
RR-049, RR-027, RR-038, RR-033, RR-030, RR-047	Location	Suggestion that the Proposed Development should be located on rooftops	The UK has a legally binding commitment to achieve net zero carbon emissions by 2050. As one of the cheapest and most rapidly deployable forms of renewable energy, solar will play an important role in achieving this commitment. The Energy Security Strategy (April 2022) set an ambition of 70GW of solar by 2035. The current Labour government made major commitments to the delivery of clean energy in its election manifesto, including to achieve "Clean Power by 2030", including tripling solar power by 2030. This cannot be achieved through rooftop and brownfield solar installations alone, as they have considerable practical barriers of their own. Many domestic and industrial buildings either do not have roofs made of suitable material to support a solar system, do not have the infrastructure to export electricity to the gird, or simply present as an unaffordable solution, with initial costs of installation too high for some. As a result, agricultural land typically of moderate or low quality is also used, without impacting on food security.

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RR-027	Location	Suggestion that the Proposed Development should be located on fencing	The Energy Security Strategy (April 2022) set an ambition of 70GW of solar by 2035. The current Labour government made major commitments to the delivery of clean energy in its election manifesto, including to achieve “Clean Power by 2030”, including tripling solar power by 2030. However, the 70GW ambition will not be achieved through rooftop solar alone, as few rooftops are ideal for solar power generation. For a rooftop solar panel to generate electricity, it must be south facing (or at least south-east or south-west), it must have at least 20 square metres of clear roof space and the roof cannot be too shallow or steep. The Applicant has selected the sites that were most suitable and available for the Proposed Development. Further details on the Applicant’s site selection process is provided in **Appendix 2 - Site Selection Assessment to the Planning Statement [APP-147]** and **ES Volume 1, Chapter 4: Alternatives and Design Iteration [APP-040]**.
RR-040	Location	Statement that substation location is not appropriate	As part of design development, the Applicant has reviewed the location of the two on-site substations and considers them an appropriate location from an engineering and environmental impact perspective. The location of the substations has been assessed within the ES, and embedded mitigation put in place to ensure that two on-site substations will not be located within

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			250m of environmental designated sites. This is secured through the **Works Plans [PDA-004].**
RR-047	Location	Concern that the North is disproportionately impacted by solar development	East Riding of Yorkshire is well suited for solar energy generation, with good levels of sunshine, along with days that are cool and clear, maximising the efficiency of solar modules. The Applicant's site selection process has been extensive, guided by the need to identify suitable land within a reasonable proximity to National Grid Creyke Beck, which is where the energy generated by the Proposed Development will feed into the National Electricity Network. Further details on the Applicant's site selection process is provided in the **Site Selection Assessment at Appendix 2 to the Planning Statement [APP-147]** and **ES Volume 1, Chapter 4: Alternatives and Design Iteration [APP-040].**
RR-044, RR-039	Location	Statement that the site location is not suitable	The Energy Security Strategy (April 2022) set an ambition of 70GW of solar by 2035. The current Labour government made major commitments to the delivery of clean energy in its election manifesto, including to achieve "Clean Power by 2030", including tripling solar power by 2030. However, the 70GW ambition will not be achieved through rooftop solar alone, as few rooftops are ideal for solar power generation. For a rooftop solar panel to generate electricity, it must be south facing (or at least south-east or south-west), it

Ref number(s)	Theme	Matter raised	Response
			must have at least 20 square metres of clear roof space and the roof cannot be too shallow or steep. The Applicant has selected the sites that were most suitable and available for the Proposed Development. Further details on the Applicant's site selection process is provided in **Appendix 2 - Site Selection Assessment to the Planning Statement [APP-147]** and **ES Volume 1, Chapter 4: Alternatives and Design Iteration [APP-040].**
RR-044	Location	Statement that the Proposed Development is out of keeping with the rural area	The site selection for a solar farm is led by availability of capacity on the National Grid and the availability of land through agreement. **ES Volume 1, Chapter 4: Alternatives and Design Iteration [APP-040]** provides a detailed account of the site selection process and the subsequent discussions with local landowners about the viability of their land to be provided through voluntary agreement for the Proposed Development. The site used for the Proposed Development can continue to contribute to local agriculture. Over 95% of the solar panel areas can be made available for sheep grazing, retaining an agricultural use and allowing topsoil to recover, by increasing soil organic matter and improving the soil structure. The leases the Applicant has agreed on the solar land grant the landowners the right to graze sheep over the life of the Proposed Development. The Applicant has also prepared and submitted a **Design Approach Document [APP-149]** which outlines the approach taken to the design development of the Proposed Development, including how the design has been shaped and

Ref number(s)	Theme	Matter raised	Response
			influenced by the local landscape, and with local communities and their enjoyment of the local area in mind.
RR-033	Location	Statement that there is not adequate evidence that urban/commercial areas have been considered	The Applicant undertook a systematic process to determine suitable sites. A range of technical, environmental, and economic factors are considered when investigating and assessing any potential site for large-scale solar developments. **Appendix 2: Site Selection Assessment** to the **Planning Statement [APP-147],** provides a detailed overview of the site selection process undertaken by the Applicant to identify the location of the Proposed Development. As part of the site selection process, consideration was given to previously developed land (PDL)/brownfield sites, commercial rooftops, and lower-quality agricultural land. An assessment of PDL/brownfield land within the wider initial Search Area, which includes parts of Hull and Beverley, identified no land of an adequate land area to facilitate a large-scale solar project either individually or in combination with other sites. An overview of the brownfield sites considered and t commentary on their suitability is available in Chapter 4 of the **Appendix 2: Site Selection Assessment** to the **Planning Statement [APP-147].**
RR-033	Maintenance	Concern that panels would reduce access to repair field drains	Site proposals include setbacks from existing watercourses in accordance with the Internal Drainage Board and Environment Agency requirements. As stated in **ES Volume 4, Appendix 5.6: Flood Risk Assessment [EN010157/APP/6.4 Revision 3],** the topography of the Site is low-lying and generally flat, and it is

Ref number(s)	Theme	Matter raised	Response
			within an area administered by the Beverley and North Holderness Internal Drainage Board. The Proposed Development design would allow for the Drainage Board to continue to undertake routine maintenance across the water study area, notably in-channel maintenance such as vegetation cutbacks, 'sludging' (a kind of dredging) and debris clearances. The Drainage Board would also continue to maintain the various control structures such as sluices and pumps across the area within their remit.
RR-049	Maintenance	Concern regarding impact on communities during maintenance	The maintenance of the solar site would be minimal and day to day activities would consist of maintenance checks and vegetation management with likely only one worker vehicle accessing the site. Occasionally there may need to be deliveries of replacement infrastructure. The impact of replacing infrastructure components is negligible, with peak vehicle movements of 2 deliveries per day anticipated at the peak of a battery replacement period.
RR-027, RR-028	Manufacturing	Concern regarding human rights issues associated with manufacturing solar panels	The Applicant commits to upholding human rights and labour rights in accordance with both national and international law. The Applicant requires its own teams as well as all its business partners and suppliers, to adhere to these laws. The Applicant takes ethical business practice very seriously and has a zero-tolerance policy to human rights violations.

Ref number(s)	Theme	Matter raised	Response
			The Applicant is a signatory of the United Nations Global Compact, and as such we are committed to upholding human rights and following international standards. The Applicant's PV modules suppliers are carefully selected and targeted with supplier and product qualification process, which includes selective manufacturing site visits. Additionally, the Applicant is a member of the Solar Stewardship Initiative (SSI) and sources PV modules from SSI-aligned manufacturers. The SSI is the leading international audit and assurance scheme dedicated to raising standards throughout the global solar value chain by improving transparency, sustainability, and traceability. SSI performs on-site visits and certifies PV module manufacturing sites according to its ESG and Traceability standards.
RR-049, RR-039, RR-048	Manufacturing	Concern that panels are imported from China / Question regarding where panels come from	It is assumed that solar PV modules and PV framework will be sourced from China, which currently produces the majority of the solar modules worldwide. The Applicant will look to source the rest of the material more locally, as far as possible.
RR-049	Manufacturing	Question regarding how panels are made	Solar panels are usually made from silicon, or another semiconductor material installed in a metal panel frame with a glass casing. The specific type of solar panel used will be decided as part of detailed engineering design, should the application be consented.

Ref number(s)	Theme	Matter raised	Response
RR-027	Manufacturing	Concern regarding deforestation in Africa associated with manufacturing process	Like many industries, solar panel and BESS manufacturing will require mined metals. The Applicant will endeavor to source panels and BESS technologies that are as sustainable and traceable as possible. The Applicant is a member of the Solar Stewardship Initiative (SSI) and sources PV modules from SSI-aligned manufacturers. The SSI is the leading international audit and assurance scheme dedicated to raising standards throughout the global solar value chain by improving transparency, sustainability, and traceability. SSI performs on-site visits and certifies PV module manufacturing sites according to its ESG and Traceability standards.
RR-027, RR-048	Manufacturing	Concern regarding environmental impact of manufacturing process / Concern regarding use of fossil fuels causing greenhouse gas emissions in manufacturing and installation processes	The Proposed Development has the potential to affect the global climate through the addition or avoidance of greenhouse gas emissions. Greenhouse gas emissions could occur directly from construction, operation and decommissioning activities (e.g. fuel consumption), but emissions occurring outside of the draft Order Limits must also be considered, such as those resulting from the extraction, manufacture and transportation of materials to the Site during construction. Lifecycle greenhouse gas emissions have been assessed, including those from the extraction, manufacture and transportation of materials (i.e., embodied carbon), installation, operation and decommissioning. Overall, the Proposed Development is anticipated to have a significant beneficial effect

Ref number(s)	Theme	Matter raised	Response
			on the climate, with 4.1 million tonnes of carbon dioxide equivalent anticipated to be saved over the lifespan of the Proposed Development when compared to Combined Cycle Gas Turbine-generated electricity. The carbon payback period of the Proposed Development has been calculated, which enables the number of years' worth of Greenhouse Gas (GHG) savings from the Proposed Development to be calculated. This is included in the **ES Volume 2, Chapter 8: Climate [APP-044].**
RR-027	Manufacturing	Concern regarding child labour associated with mining for cobalt / Concern regarding human rights issues associated with mineral mining	Like many industries, solar panel and BESS manufacturing will require mined metals. The Applicant is aware of and takes very seriously the allegations of forced labour in global solar supply chains. The Applicant is committed to ensuring that neither we nor any part of our supply chain is involved in any activities relating to slavery, forced labour, servitude or human trafficking. The Applicant has several channels for employees and external third parties to report suspected human rights violations and request assistance—as defined in the third pillar of the UN Guiding Principles on Business and Human Rights, "Access to Remedy". The channels are open to everyone who wishes to report violations of rules or regulations that pose a serious risk, including human rights violations and environmental risks to the company. The reporting channels include email, an external legal law firm which can be reached via mail or a toll-free hotline (Simmons & Simmons) and an online reporting tool for the Applicant's employees and are avail-able in multiple languages.

Ref number(s)	Theme	Matter raised	Response
			The Applicant is a member of the Solar Stewardship Initiative (SSI) and sources PV modules from SSI-aligned manufacturers. The SSI is the leading international audit and assurance scheme dedicated to raising standards throughout the global solar value chain by improving transparency, sustainability, and traceability. SSI performs on-site visits and certifies PV module manufacturing sites according to its ESG and Traceability standards.
RR-041	Noise	Concern regarding noise associated with cooling systems	To attenuate noise emissions during operation, reduced fan speeds will be employed where applicable whilst maintaining the required airflow for cooling requirements, as set out in the **Outline OEMP [EN010157/APP/7.3 Revision 2]** and secured via Requirement 14 of the **Draft DCO [EN010157/APP/3.1 Revision 4].** It is proposed that battery containers will have their chillers limited at 50% fan speed. **ES Volume 2, Chapter 12: Noise and Vibration [APP-048]** has concluded that with the implementation of mitigation measures, such as the optimised selection of plant and equipment, the use of acoustic barriers, and the inclusion of acoustic silencers and/or louvres where relevant and practicable, the effect of operational noise from the Proposed Development would be not significant.
RR-041	Noise	Concern that the noise test will now be wrong	The noise assessment has been undertaken by competent experts using a reasonable worst-case scenario for the Proposed Development. More information on the experience of the competent experts that have been involved in completing the

Ref number(s)	Theme	Matter raised	Response
			noise assessment, is available in **ES Volume 4, Appendix 1.1: Statement of Competence [APP-096].** Further details on the noise assessment are available in **ES Volume 2, Chapter 12: Noise and Vibration [APP-048], ES Volume 4 Appendix 12.3: Construction Noise Assessment Details [APP-136],** and **ES Volume 4 Appendix 12.4: Operational Noise Assessment Details [APP-137].**
RR-044, RR-039	Noise	Concern regarding noise associated with moving panels	Should tracker panels be used, the PV modules will be installed in rows, with a small 24V DC motor beneath each row to move them. The motors are operational for approximately five to ten seconds intermittently throughout the day. Test reports from the manufacturer show that the sound power level is low and is expected to be inaudible at the nearest sensitive receptors
RR-041, RR-035	Noise and vibration	Concern regarding noise associated with batteries	Any noise produced by the Proposed Development would be by the inverters, batteries or substations, which are typically placed in the centre of the site and away from residential properties. **ES Volume 2, Chapter 12: Noise and Vibration [APP-048]** provides details on the assessment of the potential noise and vibration effects arising from the construction, operation and decommissioning of the Proposed Development. Baseline noise survey information from existing background levels have been taken to understand the existing noise climate within the surrounding area. Noise sensitive receptor locations (see **ES Volume 3, Figure 12.3: Baseline Noise Monitoring Locations [APP-082]**) were agreed with East Riding of Yorkshire Council.

Ref number(s)	Theme	Matter raised	Response
			Good design and high-quality infrastructure will serve to reduce noise at source. Embedded mitigation for the Proposed Development includes locating on-site substations more than 250m from residential properties or any environmental designated site, and a minimum offset distance of 50m to residential properties from solar PV modules and other infrastructure. In addition, to attenuate noise emissions during operation, reduced fan speeds will be employed where applicable whilst maintaining the required airflow for cooling requirements, as set out in the **Outline OEMP [EN010157/APP/7.3 Revision 2]** and secured via Requirement 14 of the **Draft DCO [EN010157/APP/3.1 Revision 4].** It is proposed that battery containers will have their chillers limited at 50% fan speed. **ES Volume 2, Chapter 12: Noise and Vibration [APP-048]** has concluded that with the implementation of mitigation measures, such as the optimised selection of plant and equipment, the use of acoustic barriers, and the inclusion of acoustic silencers and/or louvres where relevant and practicable, the effect of operational noise from the Proposed Development would be not significant.
RR-035, RR-025, RR-039	Noise and vibration	Concern regarding noise associated with inverters	Any noise produced by the Proposed Development would be by the inverters, batteries or substations, which are typically placed in the centre of the site and away from residential properties. E**S Volume 2, Chapter 12: Noise and Vibration [APP-048]** provides details on the assessment of the potential noise and vibration effects arising from the construction, operation and

Ref number(s)	Theme	Matter raised	Response
			decommissioning of the Proposed Development. Baseline noise survey information from existing background levels have been taken to understand the existing noise climate within the surrounding area. Noise sensitive receptor locations (see **ES Volume 3, Figure 12.3: Baseline Noise Monitoring Locations [APP-082]**) were agreed with East Riding of Yorkshire Council. Good design and high-quality infrastructure will serve to reduce noise at source. Embedded mitigation for the Proposed Development includes locating on-site substations greater than 250m from residential properties or any environmental designated site, and a minimum offset distance of 50m to residential properties from solar PV modules and other infrastructure. In addition, to attenuate noise emissions during operation, reduced fan speeds will be employed where applicable whilst maintaining the required airflow for cooling requirements, as set out in the **Outline OEMP [EN010157/APP/7.3 Revision 2]** and secured via Requirement 14 of the **Draft DCO [EN010157/APP/3.1 Revision 4].** It is proposed that inverters will be run at 80% fan speed during the day and 60% during the night. **ES Volume 2, Chapter 12: Noise and Vibration [APP-048]** has concluded that with the implementation of mitigation measures, such as the optimised selection of plant and equipment, the use of acoustic barriers, and the inclusion of acoustic silencers and/or louvres where relevant and practicable, the effect of operational noise from the Proposed Development would be Not Significant.

Ref number(s)	Theme	Matter raised	Response
RR-042, RR-032, RR-039	Noise and vibration	General concern regarding noise	The **ES Volume 2, Chapter 12: Noise and Vibration [APP-048]** provides details on the assessment of the potential noise and vibration effects arising from both the construction and operation of the Proposed Development. Baseline noise survey information from existing background levels have been taken to understand the existing noise climate within the surrounding area. Noise sensitive receptor locations were agreed with East Riding of Yorkshire Council. Good design and high-quality infrastructure will serve to reduce noise from the Proposed Development at source. However, sound attenuation measures may be incorporated into the design of the Proposed Development to support noise levels to remain under acceptable limits, if required. Noise and vibration impacts during construction will be managed by a Construction Environmental Management Plan, which would be secured pursuant to the DCO as a requirement, and be in accordance with the **Outline CEMP [EN010157/APP/7.2 Revision 2]** submitted in support of the DCO application. The **Outline CEMP [EN010157/APP/7.2 Revision 2]** describes the framework of mitigation measures identified in the ES to be followed during the construction phase of the Proposed Development. The Construction Environmental Management Plan would be substantially in accordance with the **Outline CEMP [EN010157/APP/7.2 Revision 2]** and subject to the approval of the local planning ahead of construction. This is

Ref number(s)	Theme	Matter raised	Response
			secured via requirement 4 of the **Draft DCO [EN010157/APP/3.1 Revision 4].** During Operation (including maintenance) any noise produced by the Proposed Development would be by the inverters, batteries or substations, which are typically placed in the centre of the site and away from residential properties. The predicted noise impact of a typical solar farm is considered to be low to negligible, and nonintrusive. Details of embedded mitigation, including proposed buffers of the infrastructure, are included in **ES Volume 4, Commitments Register [EN010157/APP/6.4 Revision 2].** This includes measures such as not locating the two on-site substations within 250m of any existing residential properties or environmental designated sites, and incorporating a minimum offset distance of 50m from residential properties from solar PV modules and other infrastructure. Additional mitigation measures for the decommissioning phase are detailed in and secured by the **Outline DEMP [EN010157/APP/7.4 Revision 2]** via requirement 15 of the **Draft DCO [EN010157/APP/3.1 Revision 4]**. These will serve to minimise the noise and vibration impacts at receptors in the vicinity of the decommissioning works. A Decommissioning Traffic Management Plan will be developed prior to decommissioning and will reflect the circumstances prevailing during the period in which decommissioning is to be carried out, as secured by the **Outline DEMP [EN010157/APP/7.4 Revision 2].**

Ref number(s)	Theme	Matter raised	Response
RR-041	Noise and vibration	Statement that piledriving will create noise in Land Area B	The **ES Volume 2, Chapter 12: Noise and Vibration [APP-048]** provides details on the assessment of the potential noise and vibration effects arising from both the construction and operation of the Proposed Development. Baseline noise survey information from existing background levels has been taken to understand the existing noise climate within the surrounding area. Noise sensitive receptor locations were agreed with East Riding of Yorkshire Council. An **Outline CEMP [EN010157/APP/7.2 Revision 2]** has been developed and outlines how construction activities will be managed throughout the construction process. The Construction Environmental Management Plan would be substantially in accordance with the **Outline CEMP [EN010157/APP/7.2 Revision 2]** and subject to the approval of the local planning ahead of construction. This is secured via requirement 4 of the **Draft DCO [EN010157/APP/3.1 Revision 4].** The erection of the Solar PV Mounting Structure and the mounting of the Solar PV Modules would include piling (where required). The solar PV development areas of Land Area B are included within these works. Measures included in the **Outline CEMP [EN010157/APP/7.2 Revision 2]** include control of noise requirements and preparing a Piling Risk Assessment, if piling is required. The **Outline CEMP [EN010157/APP/7.2 Revision 2]** sets out strategies and measures for managing construction activities, including

Ref number(s)	Theme	Matter raised	Response
			stakeholder engagement, site management, environmental considerations, community impact, health and safety, and monitoring and compliance. The **Outline CEMP [EN010157/APP/7.2 Revision 2]** ensures responsible construction practices while minimising disruptions and environmental impacts. Measures included in the **Outline CEMP [EN010157/APP/7.2 Revision 2]** includes control of noise requirements. **ES Volume 2, Chapter 12: Noise and Vibration [APP-048]** provides details on the assessment of the potential vibration effects arising from both the construction and decommissioning of the Proposed Development. This chapter concludes that, following the implementation of mitigation measures in the form of Best Practicable Means and measures set out in the **Outline CEMP [EN010157/APP/7.2 Revision 2]** and **Outline DEMP [EN010157/APP/7.4 Revision 2],** effects of vibration from the Proposed Development are expected to be Not Significant for both the construction and decommissioning phases. Vibration during operation has been scoped out of assessment, as agreed with the Planning Inspectorate (see **ES Volume 4, Appendix 5.2: Scoping Opinion [APP-098]**) on the basis that the Applicant can confirm that operational elements including fixed plant items/structures would not emit discernible levels of vibration and are located at a sufficient distance away from sensitive receptors.

Ref number(s)	Theme	Matter raised	Response
RR-027, RR-041, RR-025	Noise and vibration	Concern regarding noise associated with the construction phase	The **ES Volume 2, Chapter 12: Noise and Vibration [APP-048]** provides details on the assessment of the potential noise and vibration effects arising from both the construction and operation of the Proposed Development. Baseline noise survey information from existing background levels have been taken to understand the existing noise climate within the surrounding area. Noise sensitive receptor locations were agreed with East Riding of Yorkshire Council. Good design and high-quality infrastructure will serve to reduce noise from the Proposed Development at source. However, sound attenuation measures may be incorporated into the design of the Proposed Development to support noise levels to remain under acceptable limits, if required. Noise and vibration impacts during construction will be managed by a Construction Environmental Management Plan, which would be secured pursuant to the DCO as a requirement, and be in accordance with the **Outline CEMP [EN010157/APP/7.2 Revision 2]** submitted in support of the DCO application. The **Outline CEMP [EN010157/APP/7.2 Revision 2]** describes the framework of mitigation measures identified in the ES to be followed during the construction phase of the Proposed Development. The Construction Environmental Management Plan would be substantially in accordance with the **Outline CEMP [EN010157/APP/7.2 Revision 2]** and subject to the approval of the local planning ahead of construction. This is

Ref number(s)	Theme	Matter raised	Response
			secured via requirement 4 of the **Draft DCO [EN010157/APP/3.1 Revision 4]**.
RR-025	Noise and vibration	Concern regarding noise associated with the operation	The **ES Volume 2, Chapter 12: Noise and Vibration [APP-048]** provides details on the assessment of the potential noise and vibration effects arising from both the construction and operation of the Proposed Development. Baseline noise survey information from existing background levels have been taken to understand the existing noise climate within the surrounding area. Noise sensitive receptor locations were agreed with East Riding of Yorkshire Council. Good design and high-quality infrastructure will serve to reduce noise from the Proposed Development at source. However, sound attenuation measures may be incorporated into the design of the Proposed Development to support noise levels to remain under acceptable limits, if required. During Operation (including maintenance) any noise produced by the Proposed Development would be by the inverters, batteries or substations, which are typically placed in the centre of the site and away from residential properties. The predicted noise impact of a typical solar farm is considered to be low to negligible, and nonintrusive. Details of embedded mitigation, including proposed buffers of the infrastructure, are included in **ES Volume 4, Commitments Register [EN010157/APP/6.4 Revision 2].** This includes measures such as not locating the two on-site substations within 250m of any existing residential

Ref number(s)	Theme	Matter raised	Response
			properties or environmental designated sites and incorporating a minimum offset distance of 50m from residential properties from solar PV modules and other infrastructure.
RR-044	Operation	Concern regarding disruption associated with maintenance of Proposed Development	During operation, activities taking place at the site of the Proposed Development would result in minimal disruption. Routine activities would primarily involve ongoing maintenance, safety and security checks, including replacement of components. There would also be a need to carry out environmental checks, such as monitoring the success of new planting and maintaining the local vegetation and amenity areas. Access to the Site from the local highway network would be required during the operational phase to allow for ongoing maintenance activities. The operational phase is not anticipated to generate a significant number of trips, with approximately one weekly visit to the site plus approximately 26 maintenance visits per year expected. The safety and security of the site would be reinforced through the installation of security fencing and perimeter CCTV cameras surrounding the solar panel areas. **ES Volume 1, Chapter 3: Proposed Development Description [APP-039]** provides details of the operation and maintenance arrangement for the Proposed Development. The **Outline OEMP [EN010157/APP/7.3 Revision 2]** provides details of any mitigation or monitoring measures for operational activities, including working hours, lighting, parking, security, etc. The Operational Environmental Management Plan would be

Ref number(s)	Theme	Matter raised	Response
			substantially in accordance with the **Outline OEMP [EN010157/APP/7.3 Revision 2]** and subject to the approval of the local planning ahead of operation. This is secured via requirement 14 of the **Draft DCO [EN010157/APP/3.1 Revision 4].**
RR-044	Operation	Concern that the site does not get sufficient sunlight resulting in more land being required	East Riding of Yorkshire is well suited for solar energy generation, with good levels of sunshine, along with days that are cool and clear, maximising the efficiency of solar modules. Irradiance informs site selection and further information on land use, irradiance and solar cell efficiency is available in **Appendix 2: Site Selection Assessment** to the **Planning Statement [APP-147]**
RR-044	Operation	Concern regarding the fencing being inappropriate	The Proposed Development will incorporate fencing for security and safety reasons. Operational areas of the site will be secured with perimeter fencing – 2m high deer fencing will generally be used, with the exception of the substations which will be secured by 2.4m high palisade fencing. These parameters are secured by the **Design Parameters Document [EN010157/APP/5.8 Revision 2]**. The Proposed Development incorporates landscaping and planting to soften the proposals and mitigate visual impacts, which are secured in the **Outline LEMP [EN010157/APP/7.5 Revision 3]**. **ES Volume 3, Figure 3.4: Indicative Environmental Masterplan [APP-058]** shows the fencing and planting proposed. Further details can be found in **ES Volume 2, Chapter 11: Landscape and Visual [APP-047].**

Ref number(s)	Theme	Matter raised	Response
RR-049, RR-032, RR-039	Safety	Concern regarding fire hazards	Safety for local communities, construction workers and local wildlife is a key priority for the Applicant during the construction, operation and decommissioning of the Proposed Development. The DCO Application is supported by an **Outline BSMP [EN010157/APP/7.6 Revision 2]** which sets out the approach to be taken to manage the safety of the BESS in accordance with regulatory requirements, guidance, and good industry practice. The **Outline BSMP [EN010157/APP/7.6 Revision 2]** addresses aspects such as safety, design, operation, and the strategy for firefighting and emergency planning. Additionally, the Applicant has engaged with and consulted the local Fire and Rescue service throughout the design of the Proposed Development. The **Outline BSMP [EN010157/APP/7.6 Revision 2]** sets out how the measures for ensuring safety is at the forefront of the Proposed Development. The **Outline OEMP [EN010157/APP/7.3 Revision 2],** secured via requirement 14 of the **Draft DCO [EN010157/APP/3.1 Revision 4]**, provides details of an Emergency Response Plan which will be prepared in consultation with the relevant local authority emergency planning officer, emergency services including the local fire service, as well as the Environmental Agency in relation to responding to flood warnings and other environmental incidents, emergencies and events. The Outline Battery Safety Management Plan would be substantially in accordance with the Outline Battery Safety Plan and subject to the approval of the local planning ahead of commencing relevant works. This is

Ref number(s)	Theme	Matter raised	Response
			secured via requirement 8 of the **Draft DCO [EN010157/APP/3.1 Revision 4].**
RR-049	Safety	Concern regarding the site being dangerous	During construction the site compounds would include manually operated lighting systems to ensure safety and security, especially in the winter months. Any live construction areas would be closed to the public throughout the construction phase. Site security staff would patrol the Site, in addition to hazard warning signs and CCTV. During operation there will be CCTV and fencing (approximately 2m high) to secure the site, and security personnel who will monitor the site, as outlined in the **Outline OEMP [EN010157/APP/7.3 Revision 2]** and secured via requirement 14 of the **Draft DCO [EN010157/APP/3.1 Revision 4].**
RR-027, RR-033, RR-039	Safety	Concern regarding safety risk of Proposed Development e.g. explosion risk	Safety for local communities, construction workers and local wildlife is a key priority for the Applicant during the construction, operation and decommissioning of the Proposed Development. As set out in **ES Volume 1, Chapter 5: Approach to the EIA [APP-041]** and **ES Volume 4, Appendix 5.3: Scoping Opinion Response Matrix [APP-099],** the Planning Inspectorate has agreed that major accidents and disasters can be scoped out of full assessment, on the basis that relevant mitigation measures are detailed in and secured by the **Outline CEMP [EN010157/APP/7.2 Revision 2], Outline OEMP [EN010157/APP/7.3 Revision 2],** and the **Outline BSMP [EN010157/APP/7.6 Revision 2]** via requirements 4, 14 and 8

Ref number(s)	Theme	Matter raised	Response
			of the **Draft DCO [EN010157/APP/3.1 Revision 4].** The **Outline BSMP [EN010157/APP/7.6 Revision 2]** details of how the Applicant intends to maintain and manage the battery storage, and the Applicant's strategies, protocols, and commitments, ensuring that battery storage at the Proposed Development adheres to the highest standards and contributes seamlessly to the overall success of the solar farm project. The **Outline OEMP [EN010157/APP/7.3 Revision 2]** provides details of an Emergency Response Plan which will be prepared in consultation with the relevant local authority emergency planning officer, emergency services including the local fire service, as well as the Environmental Agency in relation to responding to flood warnings and other environmental incidents, emergencies and events.
RR-039	Safety	Concern regarding site security	During construction the site compounds would include manually operated lighting systems to ensure safety and security, especially in the winter months. Any live construction areas would be closed to the public throughout the construction phase. Site security staff would patrol the Site, in addition to hazard warning signs and CCTV. During operation there will be CCTV and fencing (approximately 2m high) to secure the site, and security personnel who will monitor the site, as outlined in the **Outline OEMP [EN010157/APP/7.3 Revision 2]** and secured via Requirement 14 of the **Draft DCO [EN010157/APP/3.1 Revision 4].**

Ref number(s)	Theme	Matter raised	Response
RR-049	Safety	Concern regarding vandalism of the site	Security requirements for the Proposed Development have been embedded into the design of the proposals from the outset and are considered proportionate. Fencing and CCTV are employed across the Site to secure and monitor solar infrastructure. More details are included in the **Outline CEMP [EN010157/APP/7.2 Revision 2]** and **Outline OEMP [EN010157/APP/7.3 Revision 2]** These management plans are secured via requirements 4 and 14 of the **Draft DCO [EN010157/APP/3.1 Revision 4].**
RR-039	Safety	Concern regarding safety risk associated with the components	The DCO Application is supported by an **Outline BSMP [EN010157/APP/7.6 Revision 2]** which sets out the approach to be taken to manage the safety of the BESS in accordance with regulatory requirements, guidance, and good industry practice. The **Outline BSMP [EN010157/APP/7.6 Revision 2]** addresses aspects such as safety, design, operation, and the strategy for firefighting and emergency planning. The Battery Safety Management Plan would be substantially in accordance with the Outline Battery Safety Plan and subject to the approval of the local planning ahead of the relevant works commences. This is secured via requirement 8 of the **Draft DCO [EN010157/APP/3.1 Revision 4].** The **Outline OEMP [EN010157/APP/7.3 Revision 2]** provides details of an Emergency Response Plan which will be prepared in consultation with the relevant local authority emergency planning officer, emergency services including the local fire service, as well as the Environmental Agency in relation to

Ref number(s)	Theme	Matter raised	Response
			responding to flood warnings and other environmental incidents, emergencies and events. The Operational Environmental Management Plan would be substantially in accordance with the **Outline OEMP [EN010157/APP/7.3 Revision 2]** and subject to the approval of the local planning ahead of operation. This is secured via requirement 14 of the draft Development Consent Order. Safety for local communities, construction workers and local wildlife is a key priority for the Applicant during the construction, operation and decommissioning of the Proposed Development. The construction, operation and decommissioning of the Proposed Development are not considered to have a risk of major accidents or disasters that could affect existing or future receptors, which are not considered through existing design mitigation and regulatory regimes. By implementing recognised and approved safety legislation and regulation, no significant effects in relation to major accidents and disasters are anticipated during the construction, operation and decommissioning phases.
RR-039	Safety	Concern regarding safety risk associated with the fencing	The perimeter security fencing proposed is wire mesh deer fencing and, if required following pre-construction surveys, will include small mammal gates to allow mammals that cannot bury under the fence to pass through the site. Fencing will be set back from hedges and watercourses to allow space for animals and permissive path users to pass through fields. These

Ref number(s)	Theme	Matter raised	Response
			measures are set out and secured in the **Design Parameters Document [EN010157/APP/5.8 Revision 2]** and the **Outline LEMP [EN010157/APP/7.5 Revision 3]**. When procuring fencing the Applicant will work with suppliers to understand any potential safety risks.
RR-033	Safety	Concern regarding potential damage to gas pipes during installation	The design and layout of the solar PV and ancillary infrastructure has had regard to the location, alignment and easements of all National Gas Transmission (NGT) infrastructure. The necessary easement widths have been retained in order to ensure National Gas has the necessary maintenance and access required. Prior to the construction of works which may impact on any pipeline that is within the site boundary, a full survey of pipelines will be undertaken to determine their location and depth, and all measures will be implemented to avoid any high-pressure pipelines. This will include consultation with National Gas. Engagement with utilities companies will be undertaken prior to commencement of construction activities to agree safe methods of working around existing utilities. Adequate protection for statutory undertakers' assets is included within the protective provisions in the **Draft DCO [EN010157/APP/3.1 Revision 4]**.
RR-033	Safety	Concern that fire suppression systems will fail	Fire suppression systems are highly unlikely to fail. Since 2006 UK BESS installations have accumulated an estimated 800 years of operation (this being 656 years of currently operational BESS plus an estimated 145 operating years of those now

Ref number(s)	Theme	Matter raised	Response
			decommissioned). There have currently been only two reported BESS fires in the UK that have required FRS attendance, these occurred at Carnegie Road, Liverpool in Sept 2020 and East Tilbury in Feb 2025, the cause of the latter is yet to be declared. Given the estimated 7 million hours of operation, extrapolates out to approx. 1.4E-07 (0.00000014) failures per hour (fph) for BESS in the UK. Within the HSE R2P2 Guidance 1.0E-06 (0.000001) fph is proposed as a 'societally acceptable' safety rate for the public. The choice of fire suppression system is dependent on the BESS design and can be either or both an aerosol (generally water-based potassium solution) or a gaseous asphyxiant (inert gas or mixture of gases). The advantage of an aerosol is that it is still effective should the outer fabric of the BESS be compromised, whereas gas will escape to the atmosphere. Advantage of gaseous systems is they deploy rapidly and do not require dedicated pipe work to direct the suppressant. In some instances, BESS use both a gas and aerosol suppression system, with gas deploying first, and then the aerosol follows. In both case the suppressant is contained with the BESS if the fabric of the BESS remains intact.
RR-033	Safety	Concern regarding fire water creating toxic fluids	Water would be used only to cool areas adjacent to a BESS container to prevent fire spread, water will not be used to suppress a battery fire within a BESS container which will be suppressed using gas or aerosol-based fire suppression (see above). This approach will avoid the risk of firewater runoff

Ref number(s)	Theme	Matter raised	Response
			becoming contaminated with chemical substances contained in the batteries. The use of internal non-water-based suppression would mean that in the event of a fire, it is likely that that contaminants released or spilled would settle locally within the battery unit. It is therefore unlikely that they would be mobilised to the local water environment. Academic research and laboratory experiments have concluded that in the event of a lithium-ion cell fire several chemicals in gaseous form can be released and the composition and concentration of the off-gases include CO, CO2, HF, Oxygen and Hydrogen. The only UK BESS fire that was monitored was the Carnegie Road, Liverpool (Sept 2020). At this incident the HMEPO was present and called upon the services of an impartial scientific consultancy to determine the impact of the water runoff and smoke emitted from the fire. It was found that the fire run-off water was to be a low alkaline level, as opposed to acidic, the proposed theory being that any HF in the water had been subject to significant dilution and the alkaline reading a product of the limestone-based gravel surrounding the BESS units. The composition of the plume was determined as being negligible in toxic gas concentration. Further to this the recent fire at Moss Landing California (Feb 2025), was monitored at 1 second intervals for toxic substances in the smoke plume. It was established that the composition of the plume emanating from the fire was within US Air Pollution limits.

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RR-033	Safety	Concern regarding impact of fumes associated with BESS fire on farmland	The **Outline BSMP [EN010157/APP/7.6 Revision 2]** responds to risk and concerns around the potential for a battery fire event in the BESS. It proposes how battery fire events will be minimised through design and operational measures the proposed operational response to a fire event. The Battery Safety Management Plan would be substantially in accordance with the Outline Battery Safety Plan and subject to the approval of the local planning ahead of the commencement of BESS related works. This is secured via requirement 8 of the **Draft DCO [EN010157/APP/3.1 Revision 4].** The only UK BESS fire (Carnegie Road, Liverpool – Sept 2020) was monitored and the resultant composition of the plume was determined as being negligible in toxic gas concentration. The recent fire at Moss Landing California (Feb 2025), was monitored at 1 second intervals for toxic substances in the smoke plume. It was established that the composition of the plume emanating from the fire was within US Air Pollution limits.
RR-033	Safety	Concern regarding the impact of an explosion on buried services	The **Outline BSMP [EN010157/APP/7.6 Revision 2]** responds to risk and concerns around the potential for a battery fire event in the BESS. It proposes how battery fire events will be minimised through design and operational measures the proposed operational response to a fire event. The Battery Safety Management Plan would be substantially in accordance with the Outline Battery Safety Plan and subject to the approval of the local planning ahead of the commencement of BESS

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			related works. This is secured via requirement 8 of the **Draft DCO [EN010157/APP/3.1 Revision 4].** Discussions with statutory undertakers has been ongoing and necessary guidance and easements will be adhered to. All BESS and solar panel infrastructure will be located outside of utility easement areas, which vary depending on the statutory undertaker.
RR-033	Safety	Concern that the proposals do not include fire water storage	Water would be used only to cool areas adjacent to a BESS container to prevent fire spread, water will not be used to suppress a battery fire within a BESS container which will be suppressed using an aerosol-based fire suppression (see above). This approach will avoid the risk of firewater runoff becoming contaminated with chemical substances contained in the batteries. The use of internal non-water-based suppression would mean that in the event of a fire, it is likely that that contaminants released or spilled would settle locally within the battery unit. It is therefore unlikely that they would be mobilised to the local water environment.
RR-027	Socioeconomic	Concern regarding impact on local businesses	The Applicant acknowledges the concerns raised regarding impact on local businesses as a result of the Proposed Development. As part of the planning application, the Applicant has assessed the impact on socioeconomic receptors, which includes local businesses within the local area. The assessment

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			itself and the findings of it can be found in **ES Volume 2, Chapter 13: Population [APP-049].**
RR-027, RR-028, RR-039	Socioeconomic	Concern regarding the impact on tourism	**ES Volume 2, Chapter: 13 Population [APP-049]** outlines the likely effects arising from the construction, operation (including maintenance) and decommissioning of the Proposed Development upon the local population. The chapter assesses impacts on tourism from the point of view of occupancy rates at local accommodation providers. The chapter concludes that there would be a slight adverse, and therefore not significant, effect on the local tourism economy due to an influx of temporary workers to the area potentially resulting in a reduction in accommodation availability for tourists. However, the impact would be short to medium term and temporary during the construction and decommissioning phases. Furthermore, it is anticipated that the construction workforce associated with the Proposed Development will require accommodation throughout the week but not at weekends. The weekend period is when the majority of tourists can most likely be expected to require accommodation and therefore effects to tourism as a result of changes to occupancy rates are not likely to coincide.
RR-048, RR-050, RR-039, RR-028	Socioeconomic	Concern regarding impact on local people, Concern regarding the impact on tourism in Beverley	**ES Volume 2, Chapter: 13 Population [APP-049]** outlines the likely effects arising from the construction, operation (including maintenance) and decommissioning of the Proposed Development upon the local population.

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			The peak number of employees anticipated to be on site at any one time during the construction phase is 350 workforce staff. A report published by Construction Industry Training Board (CITB) in 2023 stated that approximately 5% of construction workers are reported to stay in temporary accommodation whilst working at their site. Therefore, for this assessment, it is anticipated that a maximum of 18 workforce staff will require temporary accommodation during the construction phase. An influx of workforce staff to the area may result in a loss of accommodation availability for tourists. Any such impact will be short to medium term and temporary during the construction phase. It is further anticipated that workforce staff will require accommodation throughout the week but not at weekends. The weekend period is when the majority of tourists can most likely be expected to require accommodation and therefore effects to tourism as a result of changes to occupancy rates are not likely to coincide, as most tourists will be using the accommodation during different periods of the week. Therefore, the amount of temporary accommodation available for tourists is unlikely to be significantly reduced. **ES Volume 2, Chapter: 13 Population [APP-049]** concludes that workforce staff would likely want to stay overnight throughout all times of year and therefore may provide more income during months that would normally see less occupants wanting to stay. Therefore, there is likely to be a temporary slight

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			beneficial effect on occupancy rates, but this would be not significant.
RR-027	Socioeconomic	Concern regarding impact on property prices	The Applicant acknowledges the concerns raised in relation to changes in property values as a result of the Proposed Development. It is not considered that the Proposed Development would impact property value.
RR-031	Socioeconomic	Statement that they will lose livelihood if the Proposed Development goes ahead	**ES Volume 2, Chapter 13: Population [APP-049]** presents an assessment of the effects which may occur as a result of all phases of the Proposed Development on local businesses and agricultural land holdings. During the operation (including maintenance) phase, the amount of land available for farming operations will be lower than during the construction phase and it is during the operation (including maintenance) phase that the two tenant farmers are expected to lose their ability to operate on the land within the Order Limits, resulting in the permanent loss (as a worst-case) of employment covering two jobs. The two tenant farmers, as non-landowners, have not been in direct conversations with the Applicant regarding the use of their land but they will receive compensation in lieu of the loss of the ability to farm the land.
RR-027, RR-031	Socioeconomic	Statement that tenant farmers will be evicted	**ES Volume 2, Chapter 13: Population [APP-049]** presents an assessment of the effects which may occur as a result of all

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			phases of the Proposed Development on local businesses and agricultural land holdings. There are seven farm operations located within the Order Limits. These businesses are mostly family run, but some also employ additional staff. Of the seven farming operations within the Order Limits, five are farmed by the landowners whilst the other two are run by tenant farmers. The two tenant farmers, as non-landowners, have not been in direct conversations with the Applicant regarding the use of their land but they will receive compensation in lieu of the loss of the ability to farm the land. It is therefore understood that the number of farming operations likely to be impacted by the Proposed Development is two, with the number of jobs lost on a permanent basis (as a worst-case) anticipated to be two.
RR-042	Socioeconomic	Statement that Land Area B surrounds plant business	The location, design and layout of the Proposed Development formed part of an iterative process which was informed and shaped by the ongoing environmental assessment process, site selection assessment and taking into consideration the project design principles and ongoing engagement and consultation with stakeholders and consultees. The Applicant has considered the landscape character of the Order Limits and its relationship with nearby communities, roads and PRoW, to identify the likely effects on the local landscape and visual amenity. To reduce effects on visual amenity, the Applicant has sought to incorporate buffers between project infrastructure and nearby

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			homes and villages, as well as new planting, where appropriate, to further screen views. As set out in **ES Volume 2, Chapter 11: Landscape and Visual [APP-047]**, new hedgerow planting, with occasional trees, is proposed along the along the eastern boundary of Fields B1 and B7 and the western boundary of Fields B4 and B8 (in Land Area B), with new hedgerow planting/infill hedgerow planting proposed along the southern extent of solar of Field B4 to soften views and provide screening of the Proposed Development. Proposed planting is secured by the **Outline LEMP [EN010157/APP/7.5 Revision 3]**. The Applicant has assessed any potential local impacts of construction and proposed measures to mitigate them, if necessary, within volume 2 of the Environmental Statement. An **Outline CEMP [EN010157/APP/7.2 Revision 2]** has been developed as part of the DCO application to outline how construction activities will be managed throughout the construction process. The **Outline CEMP [EN010157/APP/7.2 Revision 2]** sets out strategies and measures for managing construction activities, including stakeholder engagement, site management, environmental considerations, community impact, health and safety, and monitoring and compliance. The Construction Environmental Management Plan would be substantially in accordance with the **Outline CEMP [EN010157/APP/7.2 Revision 2]** and subject to the approval of the local planning ahead of construction. This is secured via

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			requirement 4 of the **Draft DCO [EN010157/APP/3.1 Revision 4].**
RR-035 RR-039 RR-041 RR-042	Socioeconomic	Concern that use of access to Area B will deter customers to plant business / Concern regarding impact on Riston Plants business	**ES Volume 2, Chapter 13: Population [APP-049]** has been updated to include Riston Plants as a receptor (it had previously been omitted in error), as captured within the **Environmental Statement Addendum [EN010157/APP/8.2 Revision 2]** which is submitted at Deadline 1. During construction, there may be some adverse impacts to customers accessing this business as a result of the temporary increase in traffic numbers and heavy goods vehicles in the area. However, any such impacts would be temporary and short term for the duration of the construction works taking place in this location. The potential operational effects of the Proposed Development primarily relate to changes in the visual environment as a result of the installation of infrastructure including solar arrays. This alteration to the existing views would be medium to long term. Given the nature of this business, it is not expected that such a change to the visual environment will lead to any significant effects
RR-041	Socioeconomic	Concern regard impact on property value at Carr House Farm	There is no empirical evidence to suggest that solar farms have a long-term impact on property values.

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RR-041	Socioeconomic	Concern regarding impact on future development at Carr House Farm	Private property and housing was scoped out of **ES Volume 2, Chapter 13: Population [APP-049]** on the basis that there are no private properties located within the Order Limits. Private properties (some of which are identified as residential dwellings) are located within a 500m radius from the Order Limits, however these properties will not need to be demolished or physically altered to facilitate the construction of the Proposed Development. Therefore, it is not considered that there will be a significant effect on private property and housing as a result of the Proposed Development. In terms of future developments at private properties, the EIA process assessed the current baseline as it is not possible to predict the effect the Proposed Development may have on future developments where planning permission has not yet been sought, such as the development of Carr House Farm for tourism.
RR-035	Socioeconomic	Request for compensation	The Applicant is not proposing to offer any compensation. on the basis of noise impacts. The potential noise impacts of the construction and operation of the Proposed Development have been fully assessed in **ES Volume 2, Chapter 12: Noise and Vibration [APP-048].** Section 12.9 of this chapter sets out the residual impacts of noise during construction and operation. These are, respectively, a “temporary minor adverse effect” and a “permanent minor adverse effect”. These are considered “not significant”. These conclusions take into account the impact of mitigation measures.

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			The mitigation measures will be set out in the Construction Environmental Management Plan which would be substantially in accordance with the Outline Construction Environmental Management Plan and subject to the approval of the local planning ahead of construction. This is secured via requirement 4 of the **Draft DCO [EN010157/APP/3.1 Revision 4]**. An equivalent method of securing mitigation for the operation of the Proposed Development is in place for the Operational Environmental Management Plan via requirement 14 of the draft DCO. As set out in the **Statement of Reasons, para. 11.2.11 [EN010157/APP/4.1 Revision 3],** through diligent inquiry, the Applicant considers that there are no persons who may be entitled to make a relevant claim as a Category 3 interest pursuant to Part 1 of the LCA 1973 in relation to the following matters: noise, vibration, smell, fumes, smoke, light emissions, discharge of solid or liquid substances.
RR-039	Socioeconomic	Concern regarding impact on livelihoods	The Applicant acknowledges the concerns raised regarding impact on local businesses as a result of the Proposed Development. As part of the planning application, the Applicant has assessed the impact on socioeconomic receptors, which includes local businesses within the local area. The assessment itself and the findings of it can be found in **ES Volume 2, Chapter 13: Population [APP-049].**

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RR-027	Traffic and Transportation	Statement that local roads are not suitable for construction traffic	The existing road network is currently used by HGVs, with this being shown in the results from traffic surveys undertaken between September 2023 – February 2024 to inform the Transport Assessment, as reported in **ES Volume 2, Chapter 14: Transport and Access [APP-050].** Baseline flows were assessed, and HGVs were identified as part of the current mix of vehicles that use the existing road network. The prepared **Outline CTMP [EN010157/APP/7.7 Revision 2]** presents proposed access routes for HGVs, taking into account weight restrictions, the nature of the roads and nearby villages. A number of works will take place on the local road network, comprising construction of junction upgrades, new accesses to serve Land Areas and cable route crossings. These works may be undertaken using single lane closures and traffic management. These works are expected to be of short duration with formal traffic management measures in place to manage these activities, as outlined in the **Outline CTMP [EN010157/APP/7.7 Revision 2]** and secured via Requirement 5 of the **Draft DCO [EN010157/APP/3.1 Revision 4].**
RR-040, RR-039	Traffic and Transportation	Concern regarding damage caused by passing lorries	Given the distribution of the Proposed Development across several land areas, the land areas will be accessed from a number of different locations. The **Outline CTMP [EN010157/APP/7.7 Revision 2]** shows the routes that construction vehicles will be advised to use. The advised routes avoid roads with weight limit restrictions and avoid roads through residential areas, where possible. As part of the Applicant's

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			assessment, a detailed access review has been undertaken to develop suitable access points and routes for the site. East Riding of Yorkshire Council has been consulted on these plans. It will be the responsibility of the Applicant and the principal contractor to make good any damage if it were to occur. To mitigate any potential impacts due to construction traffic, a number of works will take place on the local road network, comprising construction of junction upgrades, new accesses to serve Land Areas and cable route crossings, as outlined in the **ES Volume 2, Chapter 14: Transport and Access [APP-050]** and the **Outline CTMP [EN010157/APP/7.7 Revision 2]** which is secured via Requirement 5 of the **Draft DCO [EN010157/APP/3.1 Revision 4].**
RR-039	Traffic and Transportation	Concern regarding the impact on horse riders due to traffic	The assessment of the Proposed Development on Pedestrian, Horse Riding and Cyclist amenity and Accidents & Safety is detailed in **ES Volume 2, Chapter 14: Transport and Access [APP-050].** All impacts are deemed to be Not Significant.
RR-027, RR-040	Traffic and Transportation	Concern regarding the traffic associated with the construction phase	An **Outline CTMP [EN010157/APP/7.7 Revision 2]** is included in the DCO Application. The Construction Traffic Management Plan will be agreed with East Riding of Yorkshire Council and Hull City Council prior to construction. It will also be informed by further engagement with National Highways on final construction traffic routes.

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RR-039	Traffic and Transportation	Concern regarding where passing places will be sited in Arnold	The Applicant has undertaken a transport assessment to assess the potential impacts of the Proposed Development on the local and strategic road network in the surrounding area, detailed in **ES Volume 2, Chapter 14: Transport and Access [APP-050]**. A number of roads have been identified where it may be necessary to construct and use passing places for HGVs accessing the Site (see **ES Volume 4, Appendix 14.1: Transport Assessment [APP-138]**). The potential passing places would be located on sections of public highways currently considered too narrow for passing vehicles and HGVs and, where reasonably practicable, would be within the highway extent as agreed with East Riding of Yorkshire Council. The sections of road where passing places may be required are as follows: • Carr Lane (Long Riston); • Carr Lane (Arnold); • Arnold Lane West (Arnold/Long Riston); • Black Tup Lane (Arnold/Long Riston); • Meaux Lane (Meaux); and • Meaux Road (Meaux).

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			Specifically, for Arnold and as outlined in the **ES Volume 2, Chapter 14: Transport and Access [APP-050]**, the following is proposed: • Provision of 3 no. passing places on Carr Lane (Long Riston) to accommodate two HGVs passing. Provides total carriageway width of up to 7.5m for 20m length. • Provision of 2 no. passing places on Arnold Lane West to accommodate two HGVs passing. Provides carriageway width of up to 7.5m for 20m length. • Widening of existing junction to ensure there is sufficient width at the access for two HGVs to pass to mitigate against the possibility of collision or HGVs waiting on the public highway. • Provision of 3 no. passing places on Carr Lane (Arnold) to accommodate two HGVs passing. Provides carriageway width of up to 7.5m for 20m length. These passing places would be retained permanently, providing a legacy improvement after construction works have been completed. East Riding of Yorkshire Council has been consulted on these plans.
RR-048	Traffic and Transportation	General concern regarding traffic disruption	The Applicant has undertaken a transport assessment to assess the potential impacts of the Proposed Development on the local

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			and strategic road network in the surrounding area, detailed in **ES Volume 2, Chapter 14: Transport and Access [APP-050].** All impacts are deemed to be Not Significant.
RR-027, RR-039	Traffic and Transportation	Concern regarding road safety / increase in accidents due to increased traffic	The Applicant has undertaken a transport assessment to assess the potential impacts of the Proposed Development on the local and strategic road network in the surrounding area, as detailed in **ES Volume 4, Appendix 14.1: Transport Assessment [APP-138]** and **ES Volume 2, Chapter 14: Transport and Access [APP-050].** The assessment of the Proposed Development on Pedestrian, Horse Riding and Cyclist amenity and Accidents & Safety is detailed in **ES Volume 2, Chapter 14: Transport and Access [APP-050].** All impacts are deemed to be Not Significant. Given the distribution of the Proposed Development across several land areas, the land areas will be accessed from a number of different locations. The proposed routes avoid roads with weight limit restrictions and avoid roads through residential areas, where possible. As part of the Applicant's assessment, a detailed access review has been undertaken to develop suitable access points and routes for the site. **ES Volume 3, Figure 14.2: Transport Routing and the Existing Highway Network [APP-090]** shows the HGV and LGV routing and indicates that HGV will be routed along Carr Lane. All haul routes and access points have been agreed in full consultation with East Riding of Yorkshire and are considered to be suitable.

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			As explained in **ES Volume 2, Chapter 12: Transport and Access [APP-050]**, Road Safety Audits will be delivered through the detailed design technical approval process with the approving authority (East Riding of Yorkshire Council).
RR-041	Traffic and Transportation	Statement that the bridges near Carr Lane (Long Riston) are not suitable for access /heavy vehicles	The existing road network is currently used by HGVs, with this being shown in the results from traffic surveys undertaken between September 2023 – February 2024 to inform the Transport Assessment, as reported in **ES Volume 2, Chapter 14: Transport and Access [APP-050].** Baseline flows were assessed, and HGVs were identified as part of the current mix of vehicles that use the existing road network. The prepared **Outline CTMP [APP-158]** presents proposed access routes for HGVs, taking into account weight restrictions, the nature of the roads and nearby villages. The Construction Traffic Management Plan would be substantially in accordance with the **Outline CTMP [EN010157/APP/7.7 Revision 2]** and subject to the approval of the local planning ahead of construction. This is secured via requirement 5 of the **Draft DCO [EN010157/APP/3.1 Revision 4].**
RR-049, RR-048	Traffic and Transportation	Concern about heavy vehicle movements associated with Proposed Development	**ES Volume 2, Chapter 14: Transport and Access [APP-050],** and **ES Volume 3, Appendix 14.1: Transport Assessment [APP-138]** sets out the potential for traffic impact. Suitable mitigation measures are outlined in the **Outline CTMP [EN010157/APP/7.7 Revision 2]** and appropriate mitigation described within these chapters.

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			The increase in heavy goods vehicle (HGV) traffic on the A1035 east of Beverley is 21% during the peak of construction, the A165 in Long Riston is 6% and below the 30% threshold for undertaking a traffic assessment. Minor roads Meaux Lane, Arnold Lane West, Black Tup Lane and Carr Lane (in Long Riston) are likely to result percentage increases in HGV traffic over the 30% threshold, however this is based on very low existing HGV traffic volumes. An assessment of the potential residual effects of these roads was undertaken and are summarised in Table 14-34 of **ES Volume 2, Chapter 14: Transport and Access [APP-050]**. Suitable mitigation measures for the road network that construction traffic uses are outlined in the **Outline CTMP [EN010157/APP/7.7 Revision 2]** and in Table 14-20 of **ES Volume 2, Chapter 14: Transport and Access [APP-050]**. Measures include the provision of passing places and localised carriageway widening, temporary speed limit reduction on Meaux Lane, setting approved access routes for HGV traffic, road signage strategy, a Staff Travel Plan, monitoring of the traffic management measures and effective enforcement measures. The effects of construction traffic are temporary in nature and considered to be not significant following the adoption of the measures set out in the **Outline CTMP [EN010157/APP/7.7 Revision 2]** which is secured via Requirement 5 of the **Draft DCO [EN010157/APP/3.1 Revision 4]**.

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RR-048	Traffic and Transportation	Concern regarding impact on work/social life due to increased traffic	**ES Volume 2, Chapter 14: Transport and Access [APP-050],** and **ES Volume 3, Appendix 14.1: Transport Assessment [APP-138]** set out the potential for traffic impact. Suitable mitigation measures are outlined in the **Outline CTMP [EN010157/APP/7.7 Revision 2]** and appropriate mitigation described within these chapters. The increase in total vehicle traffic on the key vehicle routes (i.e. A-class roads with high daily volumes of traffic) adjacent to the Site, the A1035 east of Beverley is 1% during the peak of construction, the A165 in Long Riston is 2% and therefore both are well below the 30% threshold for undertaking an environmental traffic assessment. Suitable mitigation measures for the road network that construction traffic uses are outlined in the **Outline CTMP [EN010157/APP/7.7 Revision 2]**. Measures include the setting approved access routes for HGV traffic, road signage strategy, an Outline Travel Plan (Appendix A of the **Outline CTMP [EN010157/APP/7.7 Revision 2]**), monitoring of the traffic management measures and effective enforcement measures. The effects of construction traffic are temporary in nature and considered to be not significant following the adoption of the measures set out in the **Outline CTMP [EN010157/APP/7.7 Revision 2]**. This management plans are secured via requirement 5 of the **Draft DCO [EN010157/APP/3.1 Revision 4]**.

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RR-048	Traffic and Transportation	Concern regarding traffic on route to Wawne/Routh	Table 14-3 of **ES Volume 2, Chapter 14: Transport and Access [APP-050]** outlines the receptors/matters which were scoped out of the assessment and provides a rationale. Meaux Road and Wawne Road (south of the proposed site access on Meaux Road) was scoped out following discussions prior to submission of the DCO Application with East Riding of Yorkshire Council to take account of concerns of traffic routing through Wawne. On this basis, it was agreed that HGV construction traffic would not route through Wawne to or from the Site. Measures to control the movement of HGVs are set out in the **Outline CTMP [EN010157/APP/7.7 Revision 2]** which is secured via Requirement 5 of the **Draft DCO [EN010157/APP/3.1 Revision 4]**. **ES Volume 2, Chapter 14: Transport and Access [APP-050],** and **ES Volume 3, Appendix 14.1: Transport Assessment [APP-138]** set out the potential for traffic impact, including on Meaux Lane and the A1035 in Routh. The increase in total vehicle traffic on the A1035 is 1% during the peak of construction well below the 30% threshold for undertaking an environmental traffic assessment. The increase in total vehicle traffic on Meaux Lane is 14% but exceeds the 30% threshold for HGVs due to the very low baseline HGV volume. An assessment of the potential residual effects of these roads was undertaken and are summarised in Table 14-34 of **ES Volume 2, Chapter 14: Transport and Access [APP-050]**.

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			Suitable mitigation measures for the road network that construction traffic uses are outlined in the **Outline CTMP [EN010157/APP/7.7 Revision 2]** and in Table 14-20 of **ES Volume 2, Chapter 14: Transport and Access [APP-050]**. Measures include the provision of passing places and localised carriageway widening, temporary speed limit reduction on Meaux Lane, setting approved access routes for HGV traffic, road signage strategy, an Outline Travel Plan (Appendix A of the **Outline CTMP [EN010157/APP/7.7 Revision 2]**), monitoring of the traffic management measures and effective enforcement measures. The effects of construction traffic are temporary in nature and considered to be not significant following the adoption of the measures set out in the **Outline CTMP [EN010157/APP/7.7 Revision 2]**.
RR-048	Traffic and Transportation	Concern regarding traffic on route to Beverley	Traffic routing to and from the Proposed Development en-route to Beverley will utilise major roads comprising A-roads, such as the A1035 and A164, and the Strategic Road Network roads such as the M62 and A63. Major roads are designed to accommodate larger volumes of traffic and HGV traffic for strategic transport purposes. The **ES Volume 2, Chapter 14: Transport and Access [APP-050],** and **ES Volume 3, Appendix 14.1: Transport Assessment [APP-138]** set out the potential for traffic impact. Suitable mitigation measures are outlined in the **Outline CTMP**

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			[EN010157/APP/7.7 Revision 2] and appropriate mitigation described within these chapters. The increase in total vehicle traffic on the major roads adjacent to the Site, the A1035 east of Beverley is 1% during the peak of construction, the A165 in Long Riston is 2% and therefore both are well below the 30% threshold for undertaking an environmental traffic assessment. Suitable mitigation measures for the road network that construction traffic uses are outlined in the **Outline CTMP [EN010157/APP/7.7 Revision 2]**. Measures include setting approved access routes for HGV traffic, road signage strategy, an Outline Travel Plan (Appendix A of the **Outline CTMP [EN010157/APP/7.7 Revision 2]**), monitoring of the traffic management measures and effective enforcement measures. The effects of construction traffic are temporary in nature and considered to be not significant following the adoption of the measures set out in the **Outline CTMP [EN010157/APP/7.7 Revision 2]**. This management plan is secured via requirement 5 of the **Draft DCO [EN010157/APP/3.1 Revision 4]**.
RR-041	Traffic and Transportation	Statement that Carr Lane (Long Riston) is not suitable for heavy vehicles	Suitable mitigation measures for the road network that construction traffic uses are outlined in the **Outline CTMP [EN010157/APP/7.7 Revision 2]** and in Table 14-20 of **ES Volume 2, Chapter 14: Transport and Access [APP-050]**. Measures include the provision of passing places and localised carriageway widening, setting approved access routes for HGV

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			traffic, road signage strategy, an Outline Travel Plan (Appendix A of the **Outline CTMP [EN010157/APP/7.7 Revision 2]**), monitoring of the traffic management measures and effective enforcement measures. The effects of construction traffic are temporary in nature and considered to be not significant following the adoption of the measures outlined in the Construction Traffic Management Plan which is secured via Requirement 5 of the **Draft DCO [EN010157/APP/3.1 Revision 4]**. Specific measures are included to ensure that Carr Lane (Long Riston) is suitable to accommodate HGVs are as follows: • Widening of the Carr Lane / A165 White Cross Road junction to ensure sufficient width at the junction for two HGVs to pass to mitigate against the possibility of collision or HGVs waiting on the public highway • Passing places along Carr Lane to provide opportunities for two HGVs to pass. • Phasing of the construction programme will ensure that Carr Lane is not carrying HGVs for the full 24-month construction period.
RR-041	Traffic and Transportation	Statement that there is no access through Carr House Farm and drainage dyke	**ES Volume 3, Figure 3.5: Indicative Construction Layout Plan [APP-059]** demonstrates that the internal access track from Carr Lane (Long Riston) would be located to the east of

Ref number(s)	Theme	Matter raised	Response
			Carr House Farm, running north and south, and therefore vehicles do not require access through Carr House Farm. The Applicant is unclear as to which drainage dyke is being referred to. If it refers to Monk Dike, as set out in **ES Volume 1, Chapter 3: Proposed Development Description [APP-039]** and shown in **ES Volume 3, Figure 3.5: Indicative Construction Layout Plan [APP-059]**, for the main block of Land Area B construction vehicles would access the land to the east of Monk Dike via Carr Lane (Long Riston), while the land to the west of Monk Dike would be accessed through Land Area D (via an access point from Meaux Lane). This would avoid the need to cross Monk Dike. If it refers to the smaller drainage dyke that runs parallel to the eastern boundary of Land Area B, assessments of the suitability of the existing culverts will be made prior to construction and suitable bridges/culverts will be provided to ensure safe crossing of the drainage dyke.
RR-025	Traffic and Transportation	Statement that clarification is needed on access and security to sections E13 and E14	Land Areas E13 and E14 will be accessed using only internal access tracks, and a short section of private track situated between fields E13 and E14 This route is located within the Order Limits and will connect internally to other highway access(es).
RR-040, RR-050	Traffic and Transportation	Suggestion to relocate the access to Green Lane	The Applicant proposes to use Carr Lane to access the eastern substation.

Ref number(s)	Theme	Matter raised	Response
		substation to Beverley Road, Tickton	**ES Volume 3, Appendix 14.1: Transport Assessment [APP-138]** provides details of the proposed access arrangements to the Site. A number of accesses are proposed, and each access has been designed in order to provide safe access for HGVs and other road users. Suitable mitigation measures for the road network that construction traffic uses are outlined in the **Outline CTMP [EN010157/APP/7.7 Revision 2]** and in Table 14-20 of **ES Volume 2, Chapter 14: Transport and Access [APP-050]**. Measures include the provision of passing places and localised carriageway widening, setting approved access routes for HGV traffic, road signage strategy, an Outline Travel Plan (Appendix A of the **Outline CTMP [EN010157/APP/7.7 Revision 2]),** monitoring of the traffic management measures and effective enforcement measures. The effects of construction traffic are temporary in nature and considered to be not significant following the adoption of the measures set out in the **Outline CTMP [EN010157/APP/7.7 Revision 2]** which is secured via Requirement 5 of the **Draft DCO [EN010157/APP/3.1 Revision 4].**
RR-039	Traffic and Transportation	Concern regarding the impact of additional traffic in Arnold	**ES Volume 2, Chapter 14: Transport and Access [APP-050],** and **ES Volume 3, Appendix 14.1: Transport Assessment [APP-138]** set out the potential for traffic impact. Suitable mitigation measures are outlined in the **Outline CTMP**

Ref number(s)	Theme	Matter raised	Response
			[EN010157/APP/7.7 Revision 2] and appropriate mitigation described within these chapters. The increase in total vehicle traffic on Black Tup Lane and Arnold Lane West in Arnold are likely to result in percentage increases in HGV traffic over the 30% threshold, however this is based on very low existing HGV traffic volumes. An assessment of the potential residual effects of these roads was undertaken and are summarised in Table 14-34 of **ES Volume 2, Chapter 14 Transport and Access [APP-050]**. Suitable mitigation measures for the road network that construction traffic uses are outlined in the **Outline CTMP [EN010157/APP/7.7 Revision 2].** Measures include the provision of passing places, widening of the junction of Black Tup Lane / Carr Lane (Arnold) to accommodate HGV access, setting approved access routes for HGV traffic, road signage strategy, an Outline Travel Plan (Appendix A of the **Outline CTMP [EN010157/APP/7.7 Revision 2]**), monitoring of the traffic management measures and effective enforcement measures. The phasing of the construction programme will ensure that Black Tup Lane and Arnold Lane West in Arnold are not carrying HGVs for the full 24-month construction period. The effects of construction traffic are temporary in nature and considered to be not significant following the adoption of the measures set out in the **Outline CTMP [EN010157/APP/7.7**

Ref number(s)	Theme	Matter raised	Response
			Revision 2] which is secured via requirement 5 of the **Draft DCO [EN010157/APP/3.1 Revision 4]**.
RR-039	Traffic and Transportation	Concern that the creation of passing places will impact character of area	Passing places are an extremely common feature on the local roads throughout the study area and additional passing places would be in keeping with the existing character of the area.
RR-039	Traffic and Transportation	Concern that the creation of passing places will damage verges	Where possible the location of the proposed passing places have avoided roadside verges with biodiversity interest. This includes no passing places along the section of Meaux Lane Local Wildlife Site situated along part of Meaux Lane. The proposed passing places will be checked by a suitably qualified ecologist prior to the works and if required the works will be supervised by the ecologist. The proposed passing places will provide improved access and safety for traffic on local roads by providing a guide to road users as an appropriate location to pass an oncoming vehicle. Passing places will ensure that the roads are wide enough to enable two vehicles to pass without encroaching onto grass verge and vegetation along the edge of the highway, therefore mitigating against the potential for vehicles to damage verges.
RR-033	Traffic and Transportation	Concern that solar areas only have one access which would prevent emergency service access if blocked	Vehicle access from the public highway to all areas of the Proposed Development will be maintained during the operational phase.

Ref number(s)	Theme	Matter raised	Response
RR-033	Water and Hydrology	Statement that panels will make water run off quicker / Concern regarding drainage problems caused by panels	The solar PV modules would not increase the impermeable area and therefore are not anticipated to increase the volume of surface water runoff. The solar PV modules would be separated by a rainwater gap to allow rainwater to drain freely to the ground between the panels helping to replicate the greenfield runoff conditions. The Applicant has undertaken a flood risk assessment, **ES Volume 4, Appendix 5.6: Flood Risk Assessment [EN010157/APP/6.4 Revision 3].** This considers the watercourses, surface water flows and flooding issues for the Proposed Development. The assessment sets out an outline surface water drainage strategy to integrate with natural drainage on-site to mitigate any potential flood risk created by the Proposed Development.
RR-027, RR-033	Water and Hydrology	Concern that firewater runoff will pollute local aquifers	The Applicant has engaged with and consulted the local Fire and Rescue service throughout the design of the Proposed Development. Additionally, an **Outline BSMP [EN010157/APP/7.6 Revision 2]** sets out the approach to be taken to manage the safety of the BESS in accordance with regulatory requirements, guidance, and good industry practice. The **Outline BSMP [EN010157/APP/7.6 Revision 2]** addresses aspects such as safe design, construction, operation, and disposal and the strategy for firefighting and emergency planning and is secured via requirement 8 of the **Draft DCO [EN010157/APP/3.1 Revision 4].**

Ref number(s)	Theme	Matter raised	Response
RR-033	Water and Hydrology	Concern regarding the cost taxpayers to protect Proposed Development from flooding	The Proposed Development is fully funded by the Applicant. The Applicant has undertaken a flood risk assessment, **ES Volume 4, Appendix 5.6: Flood Risk Assessment [EN010157/APP/6.4 Revision 3].** This document considers the watercourses, surface water flows and flooding issues for the Proposed Development. The assessment sets out a drainage strategy to integrate with natural drainage on-site to mitigate any potential flood risk created by the Proposed Development.
RR-027	Water and Hydrology	General concern regarding flooding	The Site is predominantly located in Flood Zones 2 and 3 but benefits from the presence of flood defences, such as the River Hull Tidal Surge Barrier. During early engagement, the Environment Agency confirmed that it did not consider the Site to be at significant risk of tidal flooding. The Applicant has undertaken a flood risk assessment, **ES Volume 4, Appendix 5.6: Flood Risk Assessment [EN010157/APP/6.4 Revision 3].** This document considers the watercourses, surface water flows and flooding issues for the Proposed Development. The assessment sets out a drainage strategy to integrate with natural drainage on-site to mitigate any potential flood risk created by the Proposed Development. The assessment concludes that the Proposed Development would be safe from all sources of flooding over its lifetime and would not increase flood risk elsewhere.

Ref number(s)	Theme	Matter raised	Response
RR-027, RR-033	Water and Hydrology	Concern regarding flooding impact on farms downstream of the solar installation / Concern regarding impact of flooding on residences / Concern regarding impact of flooding on food supply / Concern regarding impact of flooding on businesses / Concern regarding impact of flooding on road network	The proposals would not materially change the existing flood mechanisms with respect to fluvial and surface water flooding. Surface water runoff from small areas of impermeable surfacing (<50m2) will drain directly to gravel beds sized to accommodate the runoff from a 1 in 100 year +25% 12 hour rainfall storm. Run-off form areas of impermeable surfacing greater than 50m will be managed using a formal drainage strategy. Off-site flood risk will not be affected by the proposals in accordance with a core prin-cipal of the National Planning Policy Framework. **ES Volume 4, Appendix 5.6: Flood Risk Assessment [EN010157/APP/6.4 Revision 3] for further details.**
RR-033	Water and Hydrology	Concern that pollutant chemicals can contaminate soil and water	The potential for land-based receptors to be affected by contamination were considered in detail by the assessment presented in **ES Volume 2, Chapter 10: Land, Soil and Groundwater [APP-046]**. Land-based receptors were assigned a low sensitivity. The assessment concluded that potential effects on land-based receptors from contamination would have a significance of effect of neutral or slight adverse. The potential for groundwater to be adversely impacted by the development has been considered in detail by the assessment in **ES Volume 2, Chapter 10: Land, Soil and Groundwater [APP-046]**. This considered the current baseline sensitivity of the groundwater, and then identified works during construction, operation or decommissioning that could cause pollution to occur.

Ref number(s)	Theme	Matter raised	Response
			Mitigation measures to prevent pollution are included in the management plans as detailed below. For the Proposed Development, the groundwater receptors are assigned very high sensitivity in some areas (where there is a principal aquifer and a groundwater source protection zone 1). Where there is a principal aquifer but no groundwater source protection zone 1, the receptor sensitivity is assigned as high. Due to the robust mitigation measures that are included in the management plans for all three phases of the Proposed Development, the potential impact on groundwater when mitigation measures are in place is assigned a significance of slight adverse. This means that the residual effect on the groundwater receptors (of all sensitivity levels) is not expected to be significant due to the measures that will be in place to protect the receptor. Proposed mitigation measures, that will be secured by the **Outline CEMP [EN010157/APP/7.2 Revision 2]**, **Outline OEMP [EN010157/APP/7.3 Revision 2]**, and **Outline DEMP [EN010157/APP/7.4 Revision 2]** include: • Undertaking mitigation measures or completing remediation works that are determined to be required after the site investigation work has been completed;

Ref number(s)	Theme	Matter raised	Response
			• measures to prevent disturbance of, and appropriately deal with, existing contamination encountered during the construction works; • emergency procedures to manage accidental spillages and leaks in order to minimise any risk to the soil and groundwater; • completing a piling risk assessment to ensure that potential impacts to groundwater are identified and minimised; and • measures to manage fires events (relating to the BESS) using clean agent fire suppression systems, rather than water-based systems. Run-off from construction areas will be managed during works by the **Outline CEMP [EN010157/APP/7.2 Revision 2]** and will not be released directly to the soil/groundwater. This will ensure that there is no accidental release of contaminants from working areas into the wider environment. Any run-off from solar panels will be a result of rainwater only, so this can be safely released to the underlying soil without any adverse impacts on soil or groundwater. The Construction Environmental Management Plan would be substantially in accordance with the **Outline CEMP [EN010157/APP/7.2 Revision 2]** and subject to the approval of the local planning ahead of construction. This is secured via

Ref number(s)	Theme	Matter raised	Response
			Requirement 4 of the **Draft DCO [EN010157/APP/3.1 Revision 4].** During the operational life of each solar panel, maintenance operations will ensure that no chemicals or heavy metals will be released from within the panels. Any damaged panels would be removed and replaced in accordance with the **Outline OEMP [EN010157/APP/7.3 Revision 2],** as secured by Requirement 14 of the draft DCO. Panels that are correctly maintained will not result in any release of chemicals or heavy metals to the environment.
RR-033	Water and Hydrology	Concern that the proposals do not include any water containments / Concern that the proposals do not include storm water retention systems	A strategy for managing runoff from the proposed impermeable surfaces has been agreed with the Beverley and North Holderness Internal Drainage Board who are responsible for managing water levels in the area. Runoff from areas less than 50m2 and from the panels will drain to gravel beds. Substation runoff will be contained within the compound subbase and discharge will be restricted to as close as practicable to greenfield runoff rates. Access tracks are expected to be permeable in nature or otherwise would be subject to a formal drainage strategy to disperse runoff. Further details are contained in **ES Volume 4, Appendix 5.6: Flood Risk Assessment [EN010157/APP/6.4 Revision 3].**

Ref number(s)	Theme	Matter raised	Response
RR-033	Water and Hydrology	Concern that storm water would go into local systems e.g., drains and dykes	A strategy for managing runoff from the proposed impermeable surfaces has been agreed with the Beverley and North Holderness Internal Drainage Board who are responsible for managing water levels in the area. These works will mean that the proposed development will have a negligible impact on the site's response to rainfall. Further details are contained in **ES Volume 4, Appendix 5.6: Flood Risk Assessment [EN010157/APP/6.4 Revision 3].**
RR-033	Water and Hydrology	Concern that rainfall running from panels would result in soil erosion	This is discussed in **ES Volume 4, Appendix 5.6: Flood Risk Assessment [EN010157/APP/6.4 Revision 3].** The site is generally very flat and consequently not conducive to erosion. Year-round grass cover will better protect the soil than the existing arable practices which leave
RR-033	Water and Hydrology	Concern regarding piles and cables blocking / damaging drains	Appendix A of **ES Volume 4, Appendix 5.6: Flood Risk Assessment [EN010157/APP/6.4 Revision 3]** sets out the proposed outline drainage strategy for the Proposed Development. Any land drainage systems damaged as part of the development (through piling or other construction methods) will either be reinstated or diverted with equivalent drainage systems, to ensure no lasting changes compared to the baseline. This is secured in the **Outline CEMP [EN010157/APP/7.2 Revision 2]**. In addition to this, a piling risk assessment is one of the proposed mitigation measures that will be secured by the **Outline CEMP [EN010157/APP/7.2 Revision**

Ref number(s)	Theme	Matter raised	Response
			2], **Outline OEMP [EN010157/APP/7.3 Revision 2]**, and **Outline DEMP [EN010157/APP/7.4 Revision 2]** via requirements 4, 14 and 15 of the **Draft DCO [EN010157/APP/3.1 Revision 4].**

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Peartree Hill Solar Farm

Appendix 1
Water Resources Assessment

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1 Introduction

1.1 Purpose

1.1.1 This Water Resources Assessment has been prepared on behalf of RWE Renewables UK Solar and Storge Ltd (the 'Applicant') as part of the Development Consent Order (DCO) Application for Peartree Hill Solar Farm (the 'Proposed Development'). The Proposed Development is located within the 'Order Limits' and encompasses an area of approximately 891 hectares (ha) within East Riding of Yorkshire (the 'Site').

1.1.2 The purpose of this note is to provide an assessment of the likely impact on water use by the Proposed Development. Specifically, the note will assess the likely current and proposed water use on the Site in terms of approximate or relative volumes and the source.

1.1.3 This note has been prepared in response to Relevant Representations made by the Environment Agency **[RR-005]** on 30 May 2025.

1.2 Scope

1.2.1 The note estimates the current water use on the Site as well as the potential use during construction, operation and decommissioning.

1.2.2 The Environment Agency's Relevant Representations [RR-005] included reference to dewatering and pumping during construction, particularly to facilitate horizontal directional drilling (HDD) activities. These issues have been considered in the **Environmental Statement (ES)**, particularly **ES Volume 4 Appendix 5.5: Water Framework Directive Screening [APP-101]** and **ES Volume 4, Appendix 5.1: Scoping Report [APP-097]** and the **Outline Construction Environmental Management Plan (CEMP) [APP-153]**.

2 Assessment

2.1 Existing Site Use

2.1.1 As confirmed in **ES Volume 1, Chapter 2: Location of the Proposed Development [APP-038]**, the existing land within the Order Limits predominantly comprises agricultural fields that are mostly arable with some grassland.

2.1.2 **ES Volume 2, Chapter 10: Land, Soil and Groundwater [APP-046]** explains that there are no known licensed or unlicensed groundwater abstractions within the Order Limits.. There are 17 locations where active groundwater abstraction licenses fall within 500m of the Order Limits (the study area for **ES, Volume 2, Chapter 10: Land, Soil and Groundwater**), three of which are unlicensed. The licensed abstractions are used for general farming (seven licenses) and spray irrigation (seven licenses). The unlicensed abstractions are for commercial (one license) and commercial (two licenses) uses.

2.1.3 **ES Volume 4, Appendix 10.1: Preliminary Risk Assessment [APP-122 - 124]** also explains there is one active licensed surface water abstraction within the Order Limits, used for dust suppression. There are two active licensed abstractions within 500m of the Order Limits, used for spray irrigation and dust suppression. There are no known unlicensed surface water abstractions within 500m of the Order Limits.

2.2 Proposed Water Use – Construction and Decommissioning

2.2.1 The construction phase is likely to require the most water. The **Outline CEMP [APP-153]** recommends that water could be used for construction mitigation activities such as dust suppression and wheel washing. It would also be required for welfare units (toilets, hand washing and potable water). It is estimated that an average of 250 operatives would be on Site, with peak numbers being 350.

2.2.2 Construction would be facilitated by seven main compounds and 10 satellite compounds.

2.2.3 Water use for the site welfare or mitigation (e.g. wheel washing) would be sourced from rainwater harvesting as well as mains supply and imported to the Site by bowser or tanker . The specific details of this process would be agreed with Yorkshire Water ahead of construction and outside the planning process.

2.2.4 Although subject to the preferred contractor's (yet to be procured) methodology, measures to restrict water use would be employed. These could include use of non-water based dust suppression and recyclable wheel washing facilities.

2.2.5 Potable water would be supplied by a third party specialist provider.

2.2.6 The details of decommissioning are yet to be confirmed as they would be subject to a specific outline Decommissioning Environmental Management Plan, which would follow policy, advice and guidance at the time, but for the purposes of this assessment it is presumed water use would be similar to construction.

2.3 Proposed Water Use – Operation

2.3.1 During the operational (including maintenance) phase of the Proposed Development, on-site activities would be limited to maintenance activities and grazing. Maintenance activities, as described in **ES Volume 1, Chapter 3: Proposed Development Description [APP-039]**, would include:

- Regular visual inspection of all infrastructure;
- Regular scheduled inspections and testing of equipment;
- Replacement of consumable items (e.g., inverter filters);
- Cleaning of solar PV modules, if required;
- Repair or replacement of solar modules or other components, if damaged;
- Delivery of spare parts, replacement equipment items and consumables;
- Water management (e.g., clearing of drainage ditches);
- Vegetation management (e.g., cut back of grass, hedges, trees); and
- Regular litter picking of the Site (including community accessible areas).

2.3.2 The operational phase is not anticipated to generate a significant number of trips, with approximately 26 maintenance visits per year expected. Operational workers undertaking maintenance would be based within the region and would attend the Proposed Development periodically, making use of the staff welfare and office facilities, to include water supplies, within the substation compounds.

2.3.3 The panels would be self-cleansing but may need washing at infrequent intervals depending on weather conditions. Specialist de-ionised water would be used to clean the panels.

2.3.4 Water provision for the operational welfare units required would either be sourced from rainwater harvesting or mains supplied and imported by bowsers. Potable water (if required) would be sourced from an external supplier.

The water use during operation would therefore be extremely low.

2.4 Impact on Water Use

2.4.1 The Proposed Development would not require abstraction of water from surface or groundwaters.

2.4.2 Potentially significant volumes of water would be required during construction and decommissioning, albeit temporarily. Therefore, for the majority of the Proposed Development lifetime the water demand and requirement will be extremely low. Consequently, the Proposed Development would result in a significant betterment in terms of water consumption and use.

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