



Pearmtree Hill Solar Farm

Response to Rule 17 – Request for Further Information

Document Ref: EN010157/APP/8.27

December 2025

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1 Introduction

1.1 Purpose of this document

- 1.1.1 The purpose of this document is to provide the response of RWE Renewables UK Solar and Storage Ltd (the Applicant) to the Rule 17 - Request for Further Information **[PD-020]**, which was issued on 3 December 2025 with a deadline to respond of 10 December 2025, relating to Peartree Hill Solar Farm (the Proposed Development). This does not form part of a deadline prescribed in the Revised Examination Timetable within the Rule 8 letter **[PD-017]**.
- 1.1.2 The Applicant's response to this request for further information can be found in Table 1 below.

2 Response to Rule 17 – Request for Further Information

Table 1: Applicant's response to Rule 17 - Request for Further Information [PD-020]

Ref	Request to	Request	Applicant's Response
1	Humberside Fire and Rescue Service (HFRS)	<p>The ExA notes that HFRS was consulted on the application during the pre-application period. The applicant has provided an outline Battery Safety Management Plan (oBSMP) [REP5-069] as part of the application, which explains how it has addressed comments received from HFRS. A detailed BSMP to accord with the oBSMP would be secured under requirement 8 of the draft Development Consent Order [REP5-004]. HFRS is named as a consultee on this requirement.</p> <p>The ExA is aware that the applicant has sought to further engage with HFRS over the content of the oBSMP several times during the examination, though has received no definitive confirmation of HFRS's satisfaction with it.</p> <p>In the absence of the ExA's knowledge of any substantive concerns of HFRS regarding the</p>	<p>The Applicant notes that Humberside Fire and Rescue Service submitted a response to this question [AS-024] confirming that they are satisfied with the Outline Battery Safety Management Plan [REP5-069].</p>

Ref	Request to	Request	Applicant's Response
		oBSMP, and given the stage of the examination, the ExA requests HFRS's confirmation of its satisfaction with the oBSMP. Should HFRS not be satisfied, please provide reasons for this, and endeavour to engage in constructive discussions with the application to resolve any outstanding concerns.	
2	The Applicant	<p>The ExA notes the applicant's response to ExQ3.5.1b) and c) [REP5-080]. However, some of the traffic figures (including 24, 27, 32, 34, 26, 40, 42, 44 and 48) of the Transport Assessment [REP4-025] state that "It is assumed that 50% of vehicles will travel to and from Hull Port via A1035 at Beverley and 50% via the A165.". The ExA is therefore unclear how the applicant concludes that "[...] traffic routing to and from the Site along sections of route A63 will not pass through Hull AQMA 1.". The ExA therefore requests:</p> <p>a) Further information around anticipated annual average daily traffic (AADT) levels on the A63 through Hull's air quality management area (AQMA) and, if this is likely to exceed the relevant criteria, further justification for a lack of an air quality assessment in this regard; and</p>	<p>a) The Traffic Distribution Clarification Note at Appendix 1 to this document provides clarification that the text on the traffic figures is a wording inconsistency that could be interpreted as implying all heavy goods vehicle (HGV) or light goods vehicle (LGV) construction trips travel to and from the Port of Hull, which would not be the case. The correct wording for the purposes of the assessments in ES Volume 4, Appendix 14.1: Transport Assessment [REP4-026] and ES Volume 2, Chapter 14: Transport and Access [REP5-018] is set out in Table 14-4 of ES Volume 2, Chapter 14: Transport and Access [REP5-018] in relation to the construction assumption for 'Distribution of Delivery LGVs and HGVs' and reads as follows:</p>

Ref	Request to	Request	Applicant's Response
		b) For the applicant to seek/ confirm Hull City Council's satisfaction on the applicant's air quality conclusions in this regard.	<p><i>"For the purposes of this assessment, it has been assumed that HGVs and LGVs will access the Site either from Strategic Road Network at Hull Docks or the A1(M)/M62. For local road assessment within the study area, it has been assumed that 50% of delivery vehicles will access the Site via the A165 and 50% will access via the A1035 at Beverley."</i></p> <p>The above assumptions were necessary for the purposes of assessment as the precise proportions using each route will not be confirmed until a Principal Contractor is appointed and suppliers identified through the procurement process.</p> <p>Based on the above assumption and the routing shown in ES Volume 3, Figure 14.2: Transport Routing and the Existing Highway Network [REP2-121], it has been assumed that construction vehicles will either access the Site along the A165 from the Port of Hull or along the A164 and A1035 from the wider Strategic Road Network. Therefore, it would be unlikely, given the distribution of construction HGVs and LGVs, that any would travel through the AQMA, except in exceptional circumstances (such as a major</p>

Ref	Request to	Request	Applicant's Response
			<p>route closure for works in the highway or a major road traffic accident) when construction HGVs and LGVs may need to route through the AQMA.</p> <p>The thresholds above which an air quality assessment of an AQMA is required are an Annual Average Daily Traffic flow of 100 LGVs or 25 additional HGVs through the AQMA, as set out in Table 6.2 of the Institute of Air Quality Management's Land-Use Planning & Development Control: Planning For Air Quality (January 2017)¹. If there were a small number of days when due to exceptional circumstances construction HGVs or LGVs need to pass through the AQMA, it would not be sufficient to result in an Annual Average Daily Traffic flow above the thresholds in order to trigger the need for assessment. On this basis, no assessment of the AQMA has been undertaken, which the Applicant considers to be a reasonable approach.</p> <p>b) The Traffic Distribution Clarification Note at Appendix 1 was shared with Hull City Council on 5 December 2025. Hull City</p>

¹ <https://www.iaqm.co.uk/text/guidance/air-quality-planning-guidance.pdf>

Ref	Request to	Request	Applicant's Response
			<p>Council responded via email the same day to confirm that having reviewed the information provided in the technical note regarding the proposed travel routes to/from the Proposed Development, they are satisfied with the Applicant's air quality conclusions and accept the proposed approach, including that it is not necessary to assess the AQMA in Hull (see Appendix 2 for the email correspondence with Hull City Council).</p> <p>Hull City Council also confirmed that Hull AQMA 1 is expected to be revoked in the near future, potentially before construction of the Proposed Development commences. This is set out in Hull City Council's 2025 Air Quality Annual Status Report (ASR)², where it states that <i>"Due to several years of compliance, the Council is now preparing to revoke the AQMA in the near future, by implementing additional monitoring within and around the AQMA to provide further confidence in the data"</i>.</p>

² <https://www.hull.gov.uk/downloads/file/4910/annual-status-report-2025>

Appendix 1: Traffic Distribution Clarification Note



Pearmtree Hill Solar Farm

Traffic Distribution Clarification Note in Response to Rule 17 Request

December 2025

1 Introduction

1.1.1 The Examining Authority (ExA) has provided a letter dated 3 December 2025 (see **Rule 17 - Request for Further Information [PD-020]**) to request further information from RWE Renewables UK Solar and Storage Ltd (the Applicant), under Rule 17 of the Examination Procedures Rules 2010.

1.1.2 This technical note has been prepared to respond to the request for further information at item 2 of the letter, which reads as follows:

“The ExA notes the applicant’s response to ExQ3.5.1b) and c) [REP5-080]. However, some of the traffic figures (including 24, 27, 32, 34, 26, 40, 42, 44 and 48) of the Transport Assessment [REP4-025] state that “It is assumed that 50% of vehicles will travel to and from Hull Port via A1035 at Beverley and 50% via the A165.”. The ExA is therefore unclear how the applicant concludes that “[...] traffic routing to and from the Site along sections of route A63 will not pass through Hull AQMA 1.”. The ExA therefore requests:

a) Further information around anticipated annual average daily traffic (AADT) levels on the A63 through Hull’s air quality management area (AQMA) and, if this is likely to exceed the relevant criteria, further justification for a lack of an air quality assessment in this regard; and

b) For the applicant to seek/ confirm Hull City Council’s satisfaction on the applicant’s air quality conclusions in this regard.”

1.1.3 Whilst the numbers stated are correct, the text on the traffic figures was a wording inconsistency that could be interpreted as implying all HGV and LGV construction trips travel to and from the Port of Hull, which would not be the case. The correct wording for the purposes of all the assessments in **ES Volume 4, Appendix 14.1: Transport Assessment [REP4-026]** and **ES Volume 2, Chapter 14: Transport and Access [REP5-018]** is set out in Table 14-4 of **ES Volume 2, Chapter 14: Transport and Access [REP5-018]** in relation to the construction assumption for ‘Distribution of Delivery LGVs and HGVs’ and reads as follows:

“For the purposes of this assessment, it has been assumed that HGVs and LGVs will access the Site either from Strategic Road Network at Hull Docks or the A1(M)/M62. For local road assessment within the study area, it has been assumed that 50% of delivery vehicles will access the Site via the A165 and 50% will access via the A1035 at Beverley.”

1.1.4 The above assumptions were necessary for the purposes of assessment as the precise proportions using each route will not be confirmed until a Principal

Contractor is appointed and suppliers identified through the procurement process.

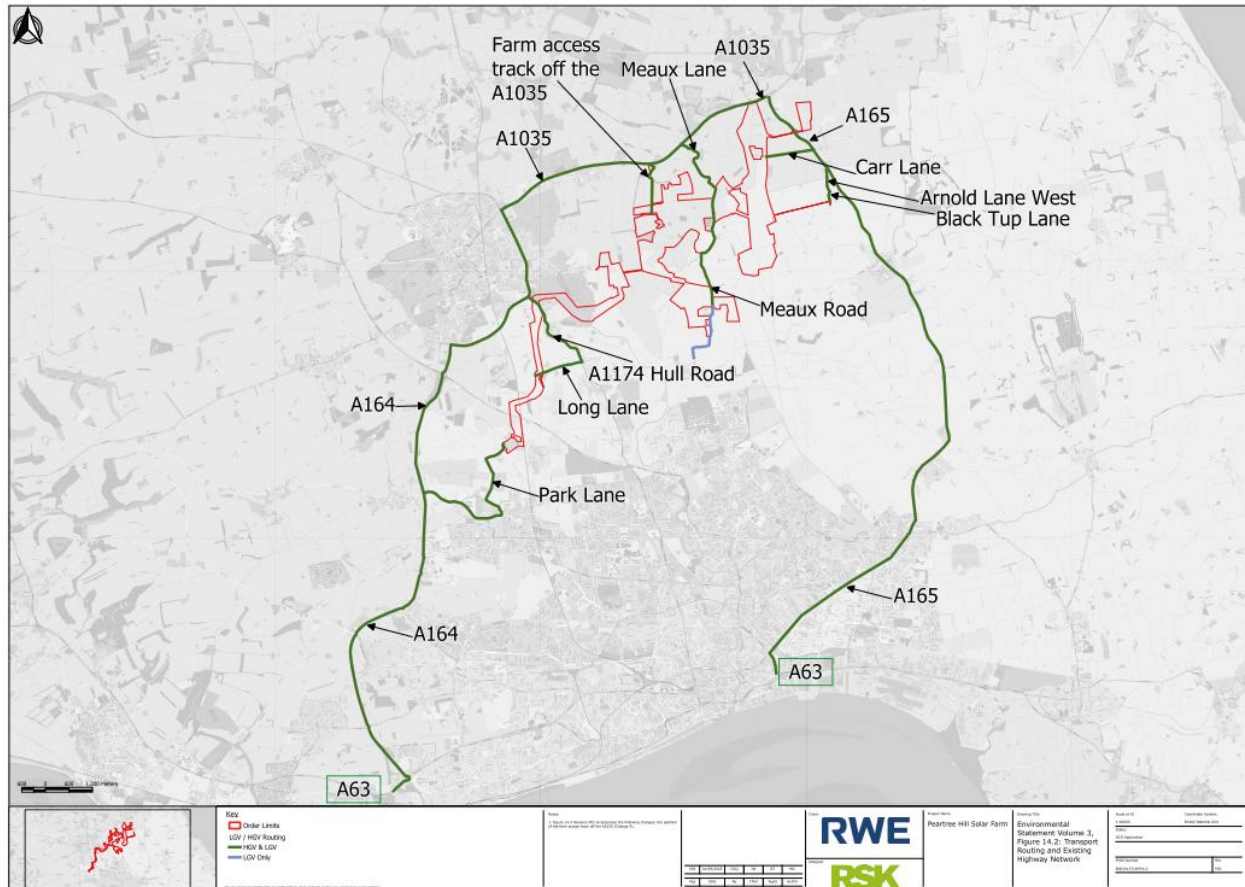
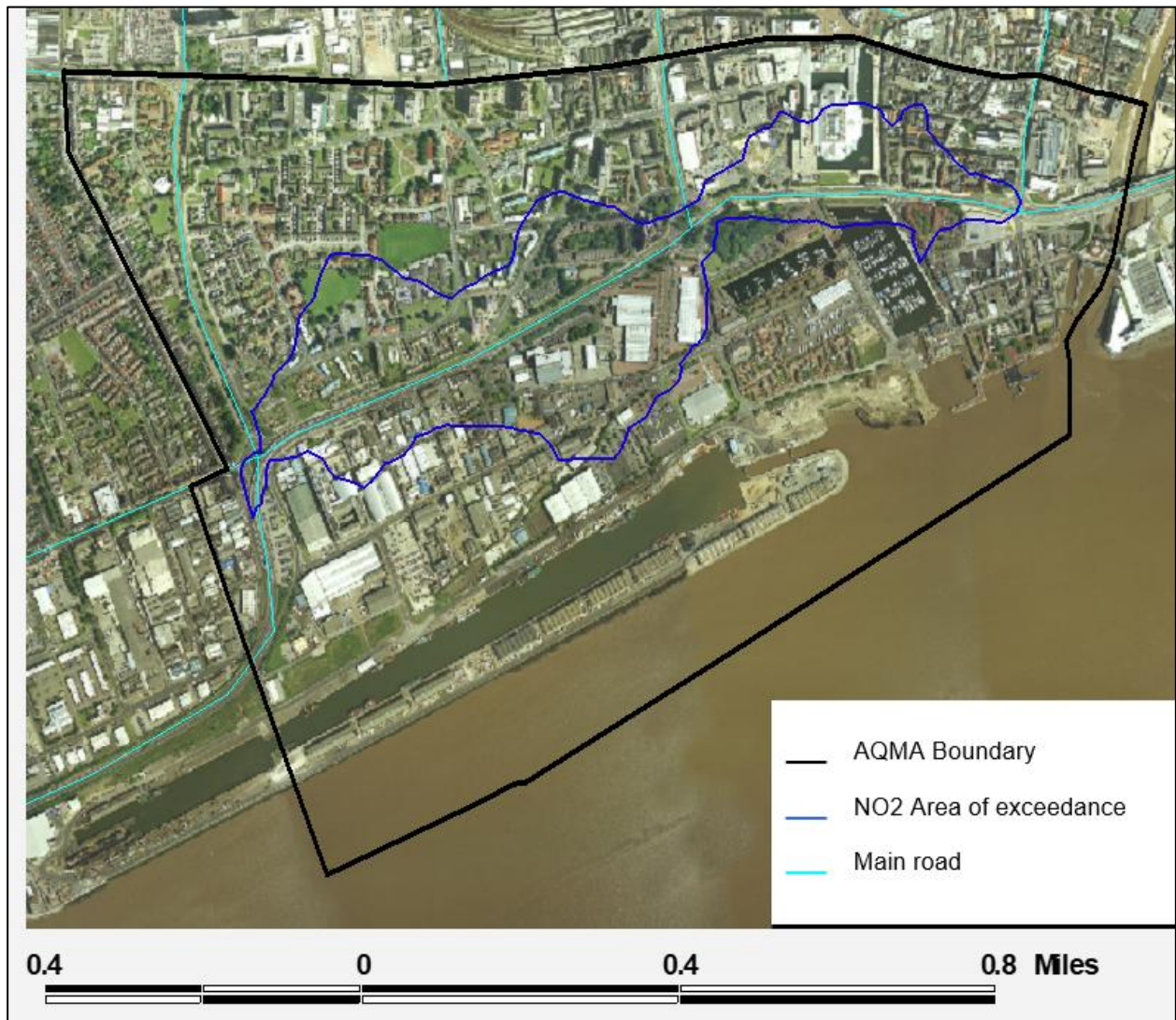


Image 1: Snip of ES Volume 3, Figure 14.2 Transport Routing and the Existing Highway Network [REP2-121]

- 1.1.5 Based on the above assumption and the transport routing shown in Image 1, it has been assumed that construction LGVs and HGVs will either access the site via the A165 from the Port of Hull *or* along the A164 and A1035 from the wider Strategic Road Network (SRN).
- 1.1.6 It is not anticipated that construction LGVs and HGVs to/from the Port would need to pass along the A63 through the Air Quality Management Area (AQMA) declared in the city of Hull (see Image 2), as the most direct route to/from the Site is along the A165. Similarly, it is not anticipated that construction LGVs and HGVs to/from the wider SRN and motorway network (M62 and A1(M)) would need to pass along the A63 through the AQMA, as the most direct route is along the A164.



Source: UK AIR Air Information Resource (Department for Environment, Food & Rural Affairs)

Image 2: Air Quality Management Area

- 1.1.7 The indicative criteria for when an assessment of an AQMA is required are set out in Table 6.2 of the Institute of Air Quality Management's Land-Use Planning & Development Control: Planning For Air Quality (January 2017)¹.
- 1.1.8 Since there would be no construction HGV and LGV movements along the A63 through the AQMA, no air quality assessment has been undertaken of the AQMA area. It is worth noting that the indicative threshold for triggering assessment of an AQMA is 25 Heavy Duty Vehicles (HDV) AADT.

¹ <https://www.iaqm.co.uk/text/guidance/air-quality-planning-guidance.pdf>

- 1.1.9 For the avoidance of doubt, the above discussion and numbers refer to HGV and LGV movements related to construction and not staff movements. Staff vehicle distribution will depend on the location of construction worker accommodation which could be local to the site, in Beverley/Hull or further afield.
- 1.1.10 The peak construction phase for the Proposed Development would be Phase 3 (construction of Land Areas C and D and grid connection works, as set out in Section 8 of **ES Volume 4, Appendix 14.1: Transport Assessment [REP4-026]**) and is predicted to generate 162 car/LGV movements AADT. The majority of workers are likely to be accommodated near the Site or to drive in from the wider SRN along the A164. Even if 50% of worker trips came to/from with the AQMA in central Hull, this would result in 81 AADT vehicle movements through the AQMA which would be below the indicative threshold of 100 light vehicles AADT for triggering further assessment.
- 1.1.11 With regards to part b) of the request for further information, the Applicant contacted Hull City Council via email on 5 December 2025 to obtain their satisfaction on the air quality assessment on the basis of this technical note.

RWE Renewables UK Limited

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Whitehill Way,
Swindon,
Wiltshire,
England,
SN5 6PB
www.rwe.com

Appendix 2: Engagement with Hull City Council

[REDACTED]

From: [REDACTED]
Sent: 05 December 2025 15:19
To: [REDACTED]
Subject: Re: Peartree Solar Farm - EN010157 - Rule 17 Letter - Hull AQMA No1 - Clarification Note

OFFICIAL

[REDACTED]

Having reviewed the information provided in the technical notes regarding the proposed travel routes to / from the proposed site for Peartree Solar Farm, I can confirm that I am satisfied with the applicant's Air Quality conclusions.

Additionally, it is worth noting anecdotally, that if the proposal's works are not anticipated to start for another 1-2 years, it is expected that Hull City Council's AQMA 1 will be revoked by the time works begin on the ground, as the AQMA has been compliant with National Air Quality Objectives for the specified time.

Kind regards

[REDACTED]
Air Quality Officer / EHO

OFFICIAL

From: [REDACTED]
Sent: 05 December 2025 11:17
To: [REDACTED]
Cc: [REDACTED]
[REDACTED] - Rule 17 Letter - Hull AQMA No1 - Clarification Note

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[REDACTED]
Thanks so much as I appreciate the short timescales .
If you need to talk through don't hesitate to give me a call

5

██████████



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From: [REDACTED]

Sent: 05 December 2025 10:58

To: [REDACTED]

Cc: [REDACTED]

Subject: Re: Peartree Solar Farm - EN010157 - Rule 17 Letter - Hull AQMA No1 - Clarification Note

OFFICIAL

Good morning

Thank you for your emails. I will be reviewing the information provided this afternoon and aim to get back to you by close of day.

114

OFFICIAL

From: [REDACTED]

Sent: 05 December 2025 10:53

To: [REDACTED]

Cc: [REDACTED]

Subject: FW: Peartree Solar Farm - EN010157 - Rule 17 Letter - Hull AQMA No1 - Clarification Note

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[REDACTED]

Following my email yesterday, please find attached draft clarification note which addresses the question in the Rule 17 request relating to the AQMA 1 area in Hull (also attached)

I trust this assists and enables you to confirm that this clarification and conclusion is acceptable to HCC?

Thanks and regards

[REDACTED]

[REDACTED]

Associate Director



10 South Parade • Leeds • LS1 5QS

Telephone: 0113 887 3323 • [REDACTED]

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From: [REDACTED]

Sent: 04 December 2025 16:00

To: [REDACTED]

Cc: [REDACTED]

Subject: Peartree Solar Farm - EN010157 - Rule 17 Letter - Hull AQMA No1 [Filed 04 Dec 2025 15:59]

Dear [REDACTED]

I've been provided your name by my colleague [REDACTED] who completed the Air Quality assessment for the above proposals.

The attached is a Rule 17 request for Clarification letter submitted by the Planning Inspectorate yesterday (see item 2a and 2b)

We are providing a clarification note to the ExA confirming that based on the traffic distribution applied and the assessments undertaken, no construction LGV or HGV trips would pass through AQMA 1 in Hull (the trips either route from the Port of Hull along the A165 or from the wider A63, M62 and A(M) along the A164 to/from the site.

Therefore this is why no AQ assessment has been carried out of the impact on the AQMA 1 area.
On the above basis are you able to confirm that this conclusion is acceptable to HCC?

We are attending hearings on this matter on 10th and 11th of December and would be really grateful if you could provide a response before then.

If you have any queries or need to discuss don't hesitate to contact me

[REDACTED]

[REDACTED]

Associate Director



10 South Parade • Leeds • LS1 5QS

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