

From:**Sent:** Monday, March 09, 2026 11:44**To:** Light Valley Solar**Cc:** Keir Mather MP; Info; parishclerk; clerk; Clerk; clerk-pc; clerk; clerk; clerk; clerk; [REDACTED] ppusel; nicharne; martingrainger**Subject:** Application: Light Valley Solar Nationally Significant Infrastructure Project (NSIP)

Application: Light Valley Solar Nationally Significant Infrastructure Project (NSIP)

Applicant: Island Green Power Location: Escrick, Hambleton, Monk Fryston, South Milford and Sherburn-in-Elmet Dear Sir / Madam, FORMAL OBJECTION TO THE LIGHT

VALLEY SOLAR NSIP We write to formally object to the proposed Light Valley Solar Nationally Significant Infrastructure Project (“the Proposed Development”). This objection is made on grounds of procedural unlawfulness, failure of statutory consultation, non-compliance with the Environmental Impact Assessment Regulations 2017, conflict with national and local planning policy and unacceptable impacts on residential amenity, landscape character, agriculture, ecology, highways, safety and community wellbeing. 1. Fundamental Failure of Meaningful Consultation The consultation undertaken by the

Applicant fails to meet the requirements of the Planning Act 2008, the Applicant’s own Statement of Community Consultation (SoCC), and established principles of fairness underpinning the NSIP regime. 1.1 Inadequate Notification and Accessibility * Residents in South Milford, including those whose properties directly abut proposed Sites 6–8, received no correspondence during Phase One consultation, despite being immediately affected. *

Although the Applicant claims that over 12,500 postcards were distributed, residents did not receive them. This failure was acknowledged by the Applicant but not remedied. * The first statutory consultation postcard was received on 1 July 2025, with consultation events commencing just three days later, rendering meaningful participation unrealistic for working residents. * No consultation event was held in South Milford, despite it being one of the communities most severely affected by the proposal. * The time and location of one of the

consultation events was incorrect on the statutory consultation postcard. This approach falls materially short of the duty to provide an early, accessible and inclusive opportunity to participate. 1.2 Failure to Consult Statutory and Equality Stakeholders * There is no evidence that Leeds City Council, a Statutory Consultee, was consulted during Phase One. * The Equality Impact Assessment asserts no adverse impacts and no feedback received, which itself demonstrates a failure of outreach. * Consultation materials were inaccessible: overly technical, poorly labelled, low-contrast and not presented in plain English. This constitutes a failure to comply with the Public Sector Equality Duty under section 149 of the Equality Act 2010. 1.3 Breach of Legitimate Expectation * Queries raised directly with the Applicant’s agents were acknowledged but never answered. * Commitments in the SoCC relating to responsiveness, transparency and engagement were not honoured, rendering the consultation superficial and developer-led. 2. Unlawful Reliance on an Outdated Scoping Opinion 2.1

Material Change to the Development Sites 6, 7 and 8 were added well after the Scoping Opinion dated 19 December 2024. These additions represent a material expansion of the red-line boundary, increasing the development area by approximately 17%, and introducing new receptors, impacts and environmental baselines. 2.2 Breach of the EIA Regulations 2017

Regulation 12(2)(b) requires that the Environmental Statement assess the entire development and all likely significant effects. The omission of Sites 6–8 from the scoping process fatally undermines the adequacy of the assessment, including but not limited to: * Habitat and protected species assessment * Wintering bird surveys (crucially with two seasons incomplete) * Transport, construction and cumulative impact analysis * Residential amenity and landscape effects * Many areas were scoped out on the basis the Application only affecting sites 1-5 In addition, under the EIA Regulations, environmental information must include a description of the baseline environment and an assessment of likely significant effects based on that baseline. Where surveys have not been undertaken, and where recognised survey windows have been missed, the resulting information cannot constitute a lawful environmental assessment. Deferral of surveys to a later stage is not permissible where: * The presence of protected or priority species is likely; * The landscape is known to be of exceptional ecological sensitivity; and * The absence of data materially affects site selection, scheme design, mitigation feasibility and deliverability. In this case, the Applicant's approach results in an Environmental Impact Assessment which is structurally incapable of complying with Regulation 14 and Schedule 4.

2.3 Failure to Follow Planning Inspectorate Guidance Planning Inspectorate Advice Note Seven is explicit that where a proposal materially changes post-scoping, a revised scoping opinion should be sought. Failure to do so exposes the application to Rule 17 information requests, legal challenge and delay or refusal. Proceeding without a revised scoping opinion undermines the integrity of the examination process. A revised scoping opinion was not prepared nor consulted upon.

3. Landscape, Green Belt and Countryside Harm The Proposed Development would cover approximately 1,020 hectares, making it one of the largest solar installations in the UK and resulting in the industrialisation of rural North Yorkshire for up to 60 years. This conflicts with: * National Planning Policy Framework paragraphs 174–176 (protection of landscape and countryside character) * Local Plan policies safeguarding rural character and preventing urban sprawl * The principle of proportionality in renewable energy development The cumulative landscape and visual impacts, including with other major infrastructure projects in the area, have not been properly assessed. The Applicant has not taken into account the fact that the Selby 2013 Local Plan, when combined with 2005 Local Plan is up to date (except for housing). As such, these Local Plans should be relied upon and the Application is in clear non-compliance with many areas.

4. Loss of Best and Most Versatile Agricultural Land The proposal would remove extensive areas of high-quality, food-producing agricultural land from use for decades, contrary to NPPF paragraph 174(b) and national food security objectives. Viable alternatives have not been properly explored, including: * Brownfield and rooftop deployment * Solar canopies over car parks * A mixed wind-and-solar approach capable of delivering equal or greater output while reducing land take by 60–70% The reliance on eight dispersed sites is a consequence of an inefficient technology choice, not an unavoidable requirement of renewable energy delivery.

5. Highway Safety and Construction Traffic Failure The Transport Assessment fails to reflect local conditions or cumulative impacts: * Three years of construction traffic, including HGVs and abnormal loads, would be routed along unsuitable rural roads. * The cumulative impacts with the Sherburn Industrial expansion and Gascoigne Interchange have not been properly assessed. * Common Lane and

the A162 are already constrained, over-capacity routes used by vulnerable road users. Also, the stopping up of a public footpath which will now send additional foot traffic down Common Lane has not been considered or consulted upon. This conflicts with NPPF paragraph 115, which requires refusal where residual cumulative impacts on highway safety would be severe.

6. Biodiversity, Flood Risk and Soil Degradation * Wildlife corridors would be fragmented by fencing and infrastructure. * The PEIR acknowledges a high risk of permanent soil degradation, particularly on Sites 6 and 7. * Soil compaction and surface water runoff risk exacerbating downstream flooding, despite recent community-funded flood defences in South Milford. Claims of biodiversity net gain are not supported by robust, enforceable or long-term management proposals.

7. Fire Safety, Aviation and Associated Local Risks * North Yorkshire Fire & Rescue Service guidance identifies significant risks associated with Battery Energy Storage Systems, including thermal runaway and access limitations. * Sherburn Aero Club lies within 1.5 miles of several sites. Glint and glare, turbulence and increased bird activity present aviation safety risks. * There is no evidence that Leeds Bradford Airport has been consulted.

8. Inadequate Community Benefit and Questionable Public Value The project offers minimal local benefit: * Few long-term local jobs * No commitment that power will serve local homes * No community benefit proportionate to the scale of harm The imbalance between national benefit and concentrated local harm is stark and unjustified.

9. Planning Balance While renewable energy is supported in principle, this proposal is excessively large, poorly located and procedurally flawed. The local and cumulative harms significantly outweigh the claimed benefits, particularly when less damaging alternatives exist.

10. Failure to maintain and update the Planning Inspectorate NSIP page We would refer you to our correspondence of 25th June 2025 in which we had to notify you of your failure to update the NSIP page for the development. Despite the site being updated on 25th June 2025 and the Applicant issuing revised materials over two months prior (which included the significant addition of Sites 6–8 to be included as part of the Phase 2 consultation which materially affected the Application), the official project page continued to reflect only the original five sites referenced during Phase 1. This misrepresented both the size and scope of the proposed development and did so for over two months. Of particular concern was the fact that the Phase 2 statutory consultation period was due to commence the following day. The Planning Inspectorate's failure to ensure the public had access to an accurate and up-to-date summary of the project for over 2 months at such a critical juncture was not simply an administrative oversight—it was a clear breach of statutory obligations under the Planning Act 2008 and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and it is a substantive failure that will taint the procedural fairness of the pre-application and subsequent examination process. The omission had the following effects: * It undermined public trust in the integrity of the NSIP consultation process. * It impaired the public's ability to engage meaningfully with the proposal. * It prejudiced the interests of those living or working near the additional sites. And more importantly, it contravened statutory obligations concerning the provision of accessible and accurate project information.

Consequences for acceptance and examination In light of the above, the Applicant cannot demonstrate that: * Statutory consultation duties have been lawfully discharged; * Statutory obligations under the Planning Act 2008 and the

Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 have been complied with or; * The application is supported by adequate environmental information. Accordingly, the proposal is incapable of satisfying the acceptance test under section 55(3)(e) of the Planning Act 2008. Any acceptance of an application on the present evidence base would be procedurally flawed and at clear risk of legal challenge. Requested Actions We respectfully request that the Planning Inspectorate; 1. Formally records this objection as a procedural representation; 2. Treats the above mentioned points as material defects at acceptance stage; 3. Requires the Applicant to undertake and consult upon a full, lawful ecological baseline before any application for a Development Consent Order is accepted. Please note that this objection is made without prejudice to further representations at acceptance, examination or judicial review stages. Yours faithfully, Nick and Louise Billingham

Dear Sir/Madam, I am writing to raise further serious concerns regarding the consultation process for the Light Valley Solar Project, as set out in the Adequacy of Consultation Milestone Statement (AoCM), reference EN0110012-000013. Having reviewed the AoCM document, there are a number of statements and omissions that do not reflect what actually took place and which call into question the adequacy and accuracy of the consultation process. On page 9, the document refers to 14,000 postcards being sent out as part of the consultation. This did not happen. This claim is repeated on page 21 (point 5). Local residents did not receive these postcards, and this assertion does not align with lived experience on the ground. As mentioned in my previous email, Matt and Annette Lardeur from Light Valley Solar said that they would look into why these weren't sent, clearly acknowledging that the postcards weren't sent. Secondly, on page 10 (point 12), it is stated that consultation materials covered construction traffic impacts. Neither phase of consultation, nor any targeted consultation materials that residents received, included information about construction traffic to the Hambleton Hough compound. We have never been provided with any plans showing how highways or public rights of way (PROW) would be affected. We have specifically asked for this information and received a response that did not address the question and instead referred us to an irrelevant map. Page 18 lists a significant number of requests from the local authority to include key information such as dates of events, stakeholder workshops, and closing dates for comments. These details were not included in the original consultation materials, raising concerns about how accessible and transparent the consultation was at the time it was conducted. On page 22, the list of consultees should also include Gateforth Parish Council and Thorpe Willoughby Parish Council. Site 4 directly borders Gateforth, yet Gateforth Parish Council was not included in the PEIR consultation, nor were they appropriately engaged

as part of the consultation process. Not only this, but Gateforth village has been measured incorrectly and sits within 1km of the edge of the site, which raises serious concerns about the competency of Light Valley Solar. Despite South Milford being one of the most impacted places, no consultation event was carried out here, meaning that many residents had no opportunity to be consulted on the plans. Finally, on page 23, point 7 contains assertions that are, frankly, not credible, particularly given that they are attributed to a major projects consultation manager. The statement does not reflect the reality of the consultation experience for affected communities. Taken together, these issues, along with those already raised in my previous email, suggest that the consultation process, as described in the AoCM, materially overstates both the extent and the effectiveness of engagement with local communities and stakeholders. I would therefore ask that the Planning Inspectorate give careful consideration to whether the consultation undertaken meets the required standards of adequacy, accuracy, and fairness. I would welcome confirmation that these concerns will be taken into account when considering whether to accept the Light Valley Solar Project for the next stage of the NSIP process. Clearly proper consultation is required. Yours faithfully, Louise Billingham