Light Valley Solar

The Applicant's Response to Relevant Representations (Part 1)

July 2026

Planning Inspectorate Reference: EN0110012
The Infrastructure Planning (Examination Procedure) Rules 2010
Rules 8(1)(c)

Light Valley Solar

Infrastructure Planning

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The Infrastructure Planning (Examination Procedure) Rules 2010

Light Valley Solar

Deadline A Submission

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1 Introduction

1.1 Purpose of the Document

1.1.1 An application (the Application) was made to the Secretary of State for Energy Security and Net Zero for a Development Consent Order (DCO) under Section 37 of the Planning Act 2008 (PA 2008) for Light Valley Solar (The Proposed Development). The Application was submitted by Light Valley Solar Limited (the Applicant) on 10 February 2026 and was accepted for examination on 9 March 2026. At this stage, the start date for the Examination into the Application is yet to be confirmed.

1.1.2 This document provides the Applicant's response to the Relevant Representations (RRs) submitted by statutory parties, as well as RRs submitted by organisations and individuals that are not statutory parties but may be considered notable.

1.1.3 The period for registering as an Interested Party through the submission of a RR ran from Thursday 19 March 2026 to Thursday 30 April 2026. The Planning Inspectorate (PINS) has published a total of 1,464 RRs submitted to the Examining Authority by Interested Parties relating to the Application for the Proposed Development. These were published on the PINS website on Monday 11 May 2026.

1.1.4 The Applicant will be submitting their response to RRs submitted by members of the public, those who have submitted RRs who are noted within the Book of Reference **[APP-022]** and any non-statutory parties that are not responded to within this document no later than Thursday 25 June 2026.

1.2 Structure of the Report

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

- **Table 1.1** sets out the list of acronyms used for management documents that form part of the Applicant's submission and may have been referred to by the Applicant in responding to RRs. The wider range of acronyms used by the Applicant can be found in the **Contents, Glossary and Abbreviations [APP-038]**.
- **Table 1.2** lists the local authorities, statutory consultees and undertakers that have submitted RRs. These submissions are presented and responded to in full in **Section 2** this document.
- **Table 1.3** lists the town councils, parish councils, and parish meetings that have submitted RRs. These submissions are presented and responded to in full in **Section 3** of this document.
- **Table 1.4** lists the notable parties and non-statutory organisations that have submitted RRs. These submissions are presented and responded to in full in **Section 4** of this document.

1.2.2 References to the Application documentation are provided in accordance with the referencing system set out in the Planning Inspectorate's Light Valley Solar Examination Library.

1.2.3 All documents submitted to the Planning Inspectorate on 10 February 2026 carry '/APP/' within their document reference. Submissions made to the Planning Inspectorate post-submission and during the pre-examination stage carry '/AS/' instead of '/APP/' within the document reference, to reflect the submission being made during the pre-examination stage.

1.2.4 A link to the Relevant Representation submission made by each party is linked within Tables 1.2, 1.3 and 1.4. Each submission can be found within the Relevant Representation Library.

Table 1.1: List of Acronyms for Submission Document

Term of Abbreviation	Definition
DCO	Development Consent Order
CR	Consultation Report (shorthand for appendices)
EIA	Environmental Impact Assessment
ES	Environmental Statement
BNG	Biodiversity Net Gain
FRADS	Flood Risk Assessment and Drainage Strategy
oCEMP	Outline Construction Environmental Management Plan
oPSRP	Outline Pollution and Spillage Response Plan
oOEMP	Outline Operational Environmental Management Plan
oDEMP	Outline Decommissioning Environmental Management Plan
oSRMP	Outline Soil Resource Management Plan
oMWMP	Outline Materials and Waste Management Plan
oPROWMP	Outline Public Rights of Way Management Plan
oLEMP	Outline Landscape and Ecological Management Plan
oBMAMP	Outline Bird Mitigation Area Management Plan
oSSCEP	Outline Skills, Supply Chain and Employment Plan
oBSMP	Outline Battery Safety Management Plan
oCTMP	Outline Construction Traffic Management Plan

1.3 Tables of Organisations Submitting Relevant Representations

Table 1.2: Listed Organisations whose Relevant Representations are Responded to in Section 2 – Statutory Bodies

Examination Library Reference	Book of Reference Plot Number(s)	Relevant Representation Received From
RR-1075	Various plots	North Yorkshire Council
RR-0177	Various plots	National Highways
RR-0419	N/A	Natural England
RR-0437	Various plots	National Grid Electricity Transmission Plc
RR-0528	06-007, 06-009, 06-010, 06-011, 06-012, 06-015, 06-016, 06-017, 06-018, 06-019, 06-022, 10-003, 10-004, 10-006, 10-009, 10-010, 10-011, 16-004, 16-006, 16-007, 16-008, 18-020, 18-021	Environment Agency
RR-0529	N/A	Forestry Commission
RR-0553	N/A	Historic England
RR-1036	N/A	SSE Hydrogen Developments Ltd
RR-1037	Various plots	Northern Powergrid (Yorkshire) PLC and (North East) PLC
RR-1038	06-010	Canal & River Trust
RR-1039	Various plots	National Gas Transmission PLC
RR-1045	N/A	UK Health Security Agency
RR-1083	Various plots	The Coal Authority (trading name The Mining Remediation Authority)
RR-1298	Various plots	Network Rail Infrastructure Limited
RR-1380	20-001, 20-002, 21-029, 21-030, 21-031, 21-032, 21-033, 21-034, 21-035, 21-036, 21-040	HD777FRY Limited

Examination Library Reference	Book of Reference Plot Number(s)	Relevant Representation Received From
RR-1413	N/A	Health and Safety Executive
RR-1440	Various plots	Ouse & Derwent Internal Drainage Board

Table 1.3: Listed Organisations whose Relevant Representations are Responded to in Section 3 – Parish Councils

Examination Library Reference	Book of Reference Plot Number(s)	Relevant Representation Received From
RR-0162	N/A	Thorpe Willoughby Parish Council
RR-0174	N/A	Burton Salmon Parish Council
RR-0222	07-003	Wistow Parish Council
RR-0422	N/A	Monk Fryston Parish Council
RR-0518	N/A	Hillam Parish Council
RR-0522	11-013, 11-014	Hambleton Parish Council
RR-0991	N/A	Birkin Parish
RR-1161	N/A	Sherburn in Elmet Town Council
RR-1280	N/A	Chapel Haddlesey Parish Council
RR-1289	N/A	West Haddlesey Parish Meeting (also submitted by Jackie Hume [RR-0581])
RR-1296	N/A	Escrick Parish Council
RR-1389	N/A	South Milford Parish Council
RR-1390	03-031, 03-032, 03-035, 03-036, 03-037, 03-039, 03-041, 03-042, 03-043, 03-044, 03-048, 04-005	Skipwith Parish Council
RR-1446	05-032, 05-036, 05-037, 05-038, 05-039, 05-040	Riccall Parish Council
RR-1453	N/A	Thorganby Parish Council

Table 1.4: Listed Organisations whose Relevant Representations are Responded to in Section 4 – Non Statutory Groups

Examination Library Reference	Book of Reference Plot Number	Relevant Representation Received From
RR-1455	N/A	Yorkshire Wildlife Trust
RR-1295	N/A	South Milford Community Allotments
RR-1143	N/A	Ramblers
RR-1082	N/A	Open Spaces Society
RR-1381	N/A	The Friends of Skipwith Common FOSC
RR-1210	N/A	Rooftops Not Countryside
RR-1393	N/A	Time Team of Burton Salmon, Hillam and Monk Fryston
RR-1299	04-002	St.Helen's Church Skipwith Parochial Church Council
RR-1279	N/A	Sherburn Aero Club
RR-1144	N/A	Ramblers Association York Group
RR-0420	N/A	ERASE East Riding Against Solar Expansion
RR-0512	N/A	Group Cadw Tir Môn
RR-0772	N/A	Keir Mather MP
RR-0172	N/A	British Horse Society

2 The Applicant's responses to local authorities and statutory bodies

Natural England

ID	Topic	Issue summary	Comment	Matters that must be secured in the DCO	Risk Red/Amber/Yellow Green/Grey	Applicant Response
NE1	**Lower Derwent Valley SPA and Ramsar and Humber Estuary SPA and Ramsar**	**Loss of functionally linked land for non-breeding birds associated with designated sites (0)**	Bird survey approach Natural England have been in discussion with the Applicant regarding this impact pathway through use of our Discretionary Advice Service. We provide a summary of our decision with regard to the use of one year of survey data below, with the clarification that this is not our usually accepted approach for solar farm schemes. Where there is likely to be significant land take due to the large scale of a development our approach is generally to request 2 years of surveys for wintering and passage birds associated with European Sites. However, when considering the location of the development boundary in relation to the Humber Estuary designated sites, along with the location of the majority of the panel sites (excluding 'Site 1') in relation to the Lower Derwent Valley designated sites, we were minded to accept the approach, with the provision of additional site based information. We considered that the variability of bird numbers associated with the Lower Derwent Valley is related to changes in flooding and therefore required consideration of the survey results alongside the River Derwent recorded flood levels. We also requested comparisons with flood data from previous years represented by the WeBS data to further contextualise the flood conditions the surveys were taken under. We also advised that information on the historic cropping regime of the development site ('Site 1') was provided to understand the suitability of the fields for bird use historically. The submitted HRA details these requested clarifications. Based on the information provided, along with desk study information, we did not anticipate a change in outcome of the mitigation design following a second year of surveys, and therefore accepted the proposed approach.	We welcome that the creation of the bird mitigation area is secured in Work 9B of Schedule 1, which details the design details. We welcome that Requirement 7, Bird mitigation area management plan, secures the creation of the mitigation plan and the need to set targets. We also welcome that the DCO secures consultation with Natural England.	**Green**	The Applicant welcomes Natural England's comments and engagement throughout the pre-application process. The Applicant notes that conclusions will not change with the additional information of bird species foraging ranges. However, the Applicant will include the additional information as part of the updated **Shadow Habitat Regulations Assessment (sHRA) [APP-223]** to be submitted no later than Deadline 1.

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			<u>Mitigation design advice</u> It is noted that the bird days calculations have been considered based on shared habitat preferences of golden plover and lapwings, as agreed for Cleve Hill Solar Farm. We advise that we do not consider this method to always be suitable, as it still needs to be ensured that there is space for the birds to use the land alongside each other, and was accepted due to surveys being undertaken over a period of 5 years for that project. However, it is considered that the size of the mitigation land is larger than the outputs from the calculations individually, and after application of the multiplier, and therefore is still demonstrated to be sufficient. We also consider that bird days should only be used to *support* design of mitigation, and calculates on a like for like basis. The mitigation design proposed includes additional provision to support birds, through creation of wet grassland, and inclusion of scrapes, and therefore has additional capacity beyond the given bird days calculations. Therefore we welcome the proposed mitigation design, and advise that delivery of this should be secured in the DCO. We also note that use of the mitigation land by greylag geese has been factored into the calculations and design, despite the assessment considering they may be associated with feral populations. We welcome this and consider it to be precautionary due to the significant peak numbers of birds identified within Site 4 during the surveys. Additional advice It would be beneficial for the assessment to consider forage distances of the bird species which were excluded from mitigation proposals, however we would not anticipate additional outcomes to be achieved from these clarifications.			
NE2	**Lower Derwent**	**Noise disturbance**	We note the assessment of noise impacts in the submitted HRA, paragraphs 8.2.64 to 8.2.90, which		**Amber**	Through further engagement with Natural England (20th May 2026), it was agreed that the

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	Valley SPA and Ramsar and Humber Estuary SPA and Ramsar	**impacts to birds using functionally linked land (C)**	demonstrate the assessment has been based on LAeq modelling. We note that the results of the Cable Route Corridor surveys did not identify significant numbers of birds which are likely to be associated with Lower Derwent Valley SPA/Ramsar or Humber Estuary SPA/Ramsar. Therefore, our advice on this impact pathway should be considered for the birds in proximity to Site 1 and for the proposed mitigation area. It is also not currently clear in the HRA whether activities which generate loud bangs, such such as HOD or piling, are required within Site 1. We do not consider that the use of LAeq alone provides sufficient information to fully understand the potential for disturbance, particularly in relation to peak noise events. To understand peak noise levels and the repetition rate of peak noises over a period of time, we suggest LAmax and/or LApeak levels are assessed, in addition to			**Shadow Habitats Regulations Assessment (sHRA) [APP-223]** will be updated no later than Deadline 1 to include construction activities to ensure that noisy activities including those which will or will not create loud *"bangs"* are captured as part of the potential impacts considered in relation to Site 1 (noting that Natural England have clarified that their concerns with regards to noise is related to Site 1 alone) and ensuring that it remains free of potential disturbance during the construction phase. In direct response to Natural England's concerns and for the benefit of capturing the discussion that took place on 20th May 2026, no percussive piling is expected for works within Site 1 and this has been secured via an update to the **Outline Construction Environmental Management Plan (oCEMP) [APP-192]** which will be submitted no later than Deadline 1. Natural England have agreed that they would be satisfied if the noise assessment clarifies the methods of using *"no time corrections"*, and the figure (noise contour) provided with the sHRA in relation to Site 1. Natural England generally accepts a 300m buffer from construction with regards to noise disturbance (above 55 decibels or sudden loud unpredictable noises) and waterbirds, which will be taken into consideration accounted for in the updated sHRA alongside the calculation (no time correction) and other literature.
NE3	**Humber Estuary SAC and Ramsar**	**Water pollution impacts to River and Sea Lamprey (C)**	We welcome that a 50m standoff distance for the Horizontal Directional Drill (HDD) will be used for crossing the river Ouse, alongside the commitment to the production of a bentonite 'frac out' contingency plan. We note the production of this is stated in 2.5 HDD Method Statement of the Outline Construction Environmental Management Plan (oCEMP). In principle we agree with the mitigation proposed, however we have additional comments on how this should be secured. Otherwise, it should be suitably secured in the documents that agreement of this plan should be in consultation with Natural England.	If the HDD method statement is to be included within the final CEMP produced for the Application, Requirement 12, Schedule 2 should secure consultation with Natural England due to the inclusion of the bentonite 'frac out' mitigation plan.	Yellow	As set out in paragraph 2.5.4 of the **oCEMP [APP-192]** any works relating to HDD will be undertaken in line with a Method Statement. A frac-out contingency plan will be implemented which will include measures to prevent, contain and control the risk of frac out including clean up procedures. The need for HDD at sensitive river crossings (including the Ouse as a migratory pathway for lamprey, which are features of the Humber Estuary SAC and River Derwent SAC) and associated mitigation (i.e. standoff distance, HDD Method Statement inc. and the production of a bentonite 'frac out' contingency plan) will be included in the detailed CEMP and is secured via Requirement 12.

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						Paragraph 2.5.1 of the oCEMP will be updated to say "*Any works relating to Horizontal Directional Drilling (HDD) activities will be undertaken in line with a Method Statement which will be developed in consultation with Natural England".* In addition, the oCEMP will be updated to state that "*Consultation with the EA and Natural England on the timings and construction methodology of construction in the vicinity of the River Ouse and Selby Dam will be undertaken, specifically to identify works outside of sensitive migratory periods for lamprey, European eel, Atlantic salmon and sea trout. The timing of avoidance periods should be agreed in consultation with the EA. However, it is assumed that the core spring migrations and the core winter spawning migration will be avoided, unless otherwise agreed with the EA."*
NE4	**Humber Estuary SAC and Ramsar**	**Noise and vibration impacts to River and Sea Lamprey (C)**	We note that assessment of the potential impacts to river and sea lamprey due to noise and vibration associated with the Ouse crossing HDD has been included in the HRA in paragraphs 8.3.8 to 8.3.16. We welcome that there has also been precautionary mitigation proposed in paragraphs 8.3.17/18, which includes the avoidance of peak migration periods. We also note that the implementation of these measures has been secured in the oCEMP in Table 3-3 Biodiversity. These are broadly secured as measures to prevent impacts to fish. While we are satisfied that the measures are secured within this table, we would recommend the association of the lamprey with the Humber Estuary SAC and Ramsar is acknowledged in the CEMP.	Due to the inclusion of the mitigation in the final CEMP, Requirement 12, Schedule 2 should secure consultation with Natural England.	**Green**	Noted. As above, the detailed CEMP will include these mitigation measures and Natural England will be consulted on the methodology for the crossing of the Ouse.
NE5	**Humber Estuary SAC and Ramsar**	**River and Sea Lamprey (0)**	It is noted in paragraphs 8.3.21 to 8.3.32 that electromagnetic fields associated with the buried cables may disturb or displace migrating lamprey associated with the River Derwent SAC and Humber Estuary SAC and Ramsar. The assessment concludes that impacts are unknown, but proposes precautionary mitigation in the form of a protective sheath to reduce magnetic fields (8.3.33). The cables will also be buried to a depth of 5m to prevent the field reaching the watercourse. We welcome this approach, however we request further information on how this has been secured.	It should be secured in a project design requirement or within the relevant documents that the cables will be buried to a depth of 5m, and covered in the protective sheath. Currently the 'Cabling Commitment' detailed in Table 2-2 of Design Principles and Parameters (February 2026) only specifies that a depth greater than the	**Amber**	Noted. As discussed with Natural England in the meeting on 20 May 2026 the consideration of EMF and the best approach to mitigation is evolving. The Applicant is committed to avoiding impacts but there needs to be some degree of flexibility to reflect the latest thinking on mitigation at the time of construction which still ensure that there are no significant effects to migrating lamprey. To cater for this flexibility, the **oCEMP [APP-192]** will be updated no later than Deadline 1to provide that the detailed CEMP will need to set out the EMF mitigation measures that have been deployed

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				standard 2m will be used where trenchless solutions have been used.		(including the depth of cabling) across the Proposed Development and explain how that has taken account of the latest research and practice on this matter. The **sHRA [APP-223]** and **Design Parameters and Commitments document [APP-217]** will be updated no later than Deadline 1 to take account of the above, noting that such flexibility could, but does not have to, include measures such as protective covers and 5m+ depths but would take account of the latest research and practice on this matter.
NE6	**Skipwith Common SAC**	**Air and water pollution (C) and (0)**	Table 7-1 of the HRA (February 2026) states that dust and water pollution impacts are ruled out for Skipwith Common SAC. A distance threshold of 50m is proposed for dust impacts. Natural England applies a dust distance criteria of 200m to designated sites due to the SSSI status as a high sensitivity receptor, however we are in agreement with impacts being ruled out as the development is still beyond this distance at its closest point. We also concur with the assessment that the water flow direction is away from the designated site, and therefore there is not a hydrological connection.	N/A	**Green**	The Applicant notes this comment.
NE7	**All international designated sites**	**Air pollution (C)**	We have attached our standard advice on NSIPs (Appendix I). You should review any further information received in line with Natural England's advice to assess the application. This standard advice is Natural England's formal statutory advice. It provides decision makers with the information needed to fulfil their statutory duties when making decisions on NSIP applications with potential air pollution impacts. Any overall conclusion regarding impacts on statutory protected sites must take into account the standard advice for air pollution.	N/A	**Yellow**	The Applicant notes this comment.
NE8	**Burr Closes, Selby SSSI**	**Loss of habitat (C)**	Natural England welcomes the updated red line boundary no longer overlaps with Burr Closes, Selby SSSI. As shown in 06.03.16.01 Environmental Statement Volume 3, Appendix 16.1 Construction Dust Assessment Environmental Statement Volume 2 - Figure 1.1 Site Location Plan. We have no further comments related to direct SSSI habitat loss.	N/A	**Green**	The Applicant notes this comment.

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NE9	**Burr Closes, Selby SSSI**	**Impacts from construction dust (C)**	We note that Section 6.2 of Appendix 16.1: Construction Dust Assessment identifies a 50m search area for ecological receptors. However, we advise the potential risks from dust to designated sites should be considered up to a distance of 200m, and this would therefore include Burr Closes, Selby SSSI as an ecological receptor. SSSIs should also be considered as high sensitivity receptors. We do agree that the dust impacts can be adequately mitigated through the measures specified in the Environmental Statement Volume 3, Appendix 16.1 Construction Dust Assessment and the oCEMP.	We are broadly satisfied that these mitigation measures are secured in the requirements of the DCO under Requirement 12, Schedule 2. However, we advise that Burr Closes, Selby SSSI should be identified as an ecological receptor in the oCEMP.	Amber	The **oCEMP [APP-192]** does not identify specific receptors to which the dust mitigation measures will be applied, as the proposed measures will be applied across the Proposed Development. The methods already included in the ES/oCEMP are sufficient to mitigate any impacts to Burr Closes SSSI, as noted by Natural England.
NE10	**All nationally designated sites**	**Air pollution (C)**	We have attached our standard advice on NSIPs (Appendix I). You should review any further information received in line with Natural England's advice to assess the application. This standard advice is Natural England's formal statutory advice. It provides decision makers with the information needed to fulfil their statutory duties when making decisions on NSIP applications with potential air pollution impacts. Any overall conclusion regarding impacts on statutory protected sites must take into account the standard advice for air pollution.	N/A	Yellow	The Applicant notes this comment. Through the ES and **shadow HRA [APP-223]**, the Applicant considers that it has adequately considered air quality impacts to ecological and ornithological receptors which could arise from the Proposed Development.
NE11	**Protected Species**	**Impacts to protected species (C)**	Natural England has adopted standing advice for protected species, which includes guidance on survey and mitigation measures. Natural England is not providing bespoke advice on the protected species information provided in the ES for this project. A separate protected species licence from Natural England or Defra may be required. Applicants should refer to the guidance at Wildlife licences: when you need to apply to check to see if a mitigation licence is required. Applicants can also make use of Natural England's charged service Pre Submission Screening Service for a review of a draft wildlife licence application. Natural England can then review a full draft licence application to issue a Letter of No Impediment (LONI) which explains that based on the information reviewed to date, that it sees no impediment to a licence being granted in the future should the DCO be issued. See Advice Note Eleven, Annex C - Natural England and the Planning Inspectorate I National Infrastructure Planning for details of the LONI process.	N/A	Grey	The Applicant notes this comment. Following discussions with Natural England, they have confirmed that a Letter of No Impediment (LoNI) is required. An Outline Water Vole Mitigation Strategy will be provided no later than Deadline 1 to Natural England which would accompany a CL31 water vole class licence, and be used to underpin the LONI. The Applicant will keep the ExA updated in respect of the progress of obtaining the LoNI.

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NE12	Biodiversity net gain (BNG)	**BNG application (C) and (0)**	We welcome the commitment to delivering BNG on this project. The Biodiversity Net Gain (BNG) Report submitted for examination (dated February 2026) demonstrates a total of 78.30% uplift in habitat units; 72.12% uplift in hedgerow units; and 10.42% uplift in watercourse units (5.7). It is also confirmed that the statutory metric has been used for the calculations. We welcome that these increases are all above the 10% minimum uplift and will be secured for a minimum of 30 years (5.8), in line with best practice for BNG in NSIPs. It would be beneficial to ensure that final BNG proposals align with the aims of the relevant Local Nature Recovery Strategy. The potential for additional environmental enhancement measures to be included within the plans which can be 'stacked' within BNG calculations could also be explored. Please see What you can count towards a development's biodiversity net gain.	We welcome that Requirement 8, Schedule 2 of the DCO secures the minimum 10% BNG for habitat units, hedgerow units and water course units and consider this wording should be included in the final DCO. It would also be further welcomed if the wording secured the current values as the minimum BNG delivery. Requirement 6, Schedule 2 secures the development of a final Landscape and ecological management plan, which will secure the details of the created habitat. We also welcome this requirement and advise it should be included in the final DCO.	**Green**	The potential for additional environmental enhancement measures to be included within the plans which can be 'stacked' within BNG calculations will be able to be explored as part of the final approval of the detailed Landscape and Ecological Management Plan (LEMP) by North Yorkshire Council as local planning authority. This will be able to take account of the latest position on BNG practice at the time (noting the soon to be published Guidance on BNG for NSIPs) and the development of the Local Nature Recovery Strategy.
NE13	**Soils and Best and Most Versatile Agricultural Land**	**Comments on the *Environmental Statement Volume 1, Chapter 5: Agricultural Land and Soils* Document Reference: EN0110012/ APP/LVS/06.01.05**	Based on the information provided with the planning application, it appears that the Proposed Development comprises approximately ~1270ha of agricultural land, including ~486.Sha classified as 'best and most versatile' (Grades 1, 2 and 3a land in the Agricultural Land Classification (ALC) system), which includes ~924.1ha solar development sites; ~328.Sha Cable Route Corridors and 17.1ha of highways improvements. A semi-detailed ALC survey has been undertaken across ~823.1ha of agricultural land, of which 486.5 ha is BMV agricultural land (Grades 1, 2 and 3a land in the Agricultural Land Classification (ALC) system). The ALC grades have been determined from a combination of a semi-detailed ALC survey and a previous detailed ALC survey data covering approximately 77 ha of Solar Development Site 1. Within the Order Limits, it is stated that over 19.1 ha will be subject to permanent development. A recent Secretary of State ruling confirmed that: *"sealed over hard standing areas of the Proposed Development should be treated on a precautionary*	Further information required.	**Amber**	**ES Volume 1, Chapter 5: Agricultural Land and Soils [APP-043]** distinguishes between long-term land use with no soil sealing (land under panels) in paragraph 5.9.11, and long-term land use with soil sealing in paragraph 5.9.13 to 5.9.17. The IEMA guidance used to inform the assessment notes a magnitude of change of any reversible land use as minor. This criterion has been applied in the assessment of paneled areas. For sealed land, the assessment applies the magnitude of change criteria for permanent losses. A moderate/medium magnitude of impact has been applied, as the area of sealed land is between 5 and 20 ha. While the assessment does distinguish between the significance of sealed vs not sealed land, the Applicant acknowledges that the consistency of terminology used in **ES Chapter 5 [APP-043]** is currently confusing and confirms that the position is as follows: • Direct, long-term temporary effects on land under panels and the locations of temporary construction compounds and access tracks

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			basis as 'permanently lost'… to provide a worst-case scenario where such areas cannot be returned to the same Agricultural Land Classification grade." The Secretary of State further confirmed that this worst-case, precautionary approach has been followed on other similar solar farm developments and is appropriate. In light of this, the ES's assumption that sealed land can routinely be restored to its previous ALC grade cannot be relied upon for the purposes of assessing effects on BMV land. The correct assessment baseline must therefore treat all areas subject to soil sealing and hardstanding as permanent losses of BMV land, irrespective of proposed decommissioning. Table 5-4 The recently published Land Use Framework for England (18 March 2026) provides a national, principles-based approach for making spatial decisions across competing land-use pressures, supported by advanced data, spatial analysis, and a vision for resilient multifunctional landscapes. For solar NSIP (Nationally Significant Infrastructure Project) DCO submissions, the framework should be used by decision makers as strategic guidance to ensure that large-scale solar development is planned in a way that aligns with national land-use priorities, particularly the framework's emphasis on using land efficiently, integrating renewable energy alongside other functions, and avoiding the perceived "false choices" between solar deployment and agricultural or environmental uses. In practice, this means applicants and examining authorities should demonstrate how proposed solar infrastructure supports the framework's overarching aims: optimising land for multiple benefits, contributing to clean energy goals, protecting nature, and supporting coherent, joined-up planning across sectors and geographies. Table 5-8 Natural England has advised the applicant regarding survey density for the proposal, see response dated 31/07/2025. 5.9.12 The Environmental Statement consistently characterises land take for permanent infrastructure as "temporary, albeit long-term", on the assumption that all fixed infrastructure would be removed at decommissioning and the land returned to its current			• that would not be sealed, would be subject to a low magnitude of change; • Direct, permanent effects on land in the location of the BESS, which would be sealed and subject to a medium magnitude of change; and • Direct, permanent effects on land in the locations of the 275kV substations which would be sealed and subject to a low magnitude of change. **ES Chapter 5 [APP-043]** notes under Operational Effects that reverting arable land to long-term grassland is expected to result in a significant beneficial effect on soil health. The **Outline Landscape and Ecological Management Plan (oLEMP) [APP-195]** identifies improvements to ditches and local waterways as a result of halting routine agricultural fertiliser and pesticide applications. The LEMP also notes a long-term objective to increase the extent and value of wildlife habitat. During consultation undertaken with Natural England on the 10th November 2025 (on Microsoft Teams), it was noted that, although a survey density of one per hectare remains best practice, the sampling densities achieved across the Solar Development Sites are acceptable. The rationale for the sampling strategy in the Cable Route Corridor was also accepted, but Natural England noted that a commitment to undertake additional sampling prior to construction is expected. **ES Chapter 5 [APP-043]** confirms that the cumulative loss of agricultural land resulting from a shortlist of developments identified, many of which are also solar projects, would result in a significant loss of agricultural land at a district scale. The ISEP (December 2025) guidance referred to suggests that cumulative effects on land and soil should be determined according to the contribution of individual projects to the rate of land losses at a national level on a rolling five-year basis, but that this would require the development of a database that is not yet established. It is therefore currently not feasible for the Applicant to undertake such an

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			agricultural use (paragraph 5.9.12). However, this approach is inconsistent with the Secretary of State's recent ruling. Therefore, the Environmental Statement underestimates both the scale and significance of effects on BMV land and the assumption that sealed land can be returned to its original ALC grade should be set aside. All permanently sealed areas must be assessed on a worst-case basis as permanent loss, consistent with established decision-making practice. The ES places notable weight on the relative abundance of BMV land within Selby District and the wider Yorkshire and Humber region, and on national estimates of agricultural land use for solar development. While regional context is relevant, it does not negate the policy objective of protecting BMV land, nor does it remove the need to properly assess the permanent loss of such land at the site level. Furthermore, the cited estimate of approximately 19.1 ha of permanently affected BMV land is derived from the ES's non-precautionary methodology and therefore understates the likely worst-case loss. When this correction is applied, several effects currently described as *Minor* or *Not Significant* require reclassification, and the overall balance of harm to BMV land becomes material in planning terms. Accordingly, the assessment in ES paragraphs 5.9.12–5.9.19 should be afforded reduced weight, and the decision-maker should instead apply the precautionary approach now confirmed by the Secretary of State. 5.9.18/19 NPS EN-1 (paragraph 5.11.34) requires that development should not be sited on BMV agricultural land without justification, and that poorer quality land should be preferred where possible. Chapter 5's justification relies in part on assumptions of reversibility and proportionality (paras 5.9.18–5.9.19). Where sealed areas are instead treated as permanently lost in line with the Secretary of State's ruling, these justifications carry less weight, and the policy test becomes more stringent.			assessment.

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			5.14.5 Paragraph 5.14.5 of the ES acknowledges that cumulative loss of BMV land at district scale is locally significant. Applying a precautionary permanent-loss assumption to sealed areas would further reinforce Natural England's concern about cumulative pressure on BMV land resources in the area. The ALC system is a national system, therefore the significance should also be determined in the national context. However cumulative impacts should consider all development that will result in or could lead to a loss of 20ha BMV soils. There is external guidance available that might be helpful when you are considering the cumulative impact of the loss of best and most versatile agricultural land as part of the DCO submission. 1. The Institute of Environmental Management and Assessment (IEMA) have recently released guidance on Land and Soils. The guidance is aimed at Environmental Impact Assessment (EIA) of projects 2. The IEMA guidance also refers to The Design Manual for Roads and Bridges (DMRB) (2019) LA109 Geology and Soils EIA Guidance which might also be a useful resource. The guidance sets out the assessment criteria and methodology for highway projects only, though parts of the DMRB guidance are sometimes applied to other project types. The *Institute of Environmental Management and Assessment (2022) A New Perspective on Land and Soil in Environmental Impact Assessment* has now been supplemented by new *Institute of Sustainability and Environmental Professionals (ISEP)* guidance. In December 2025 ISEP published an advice note titled '*Solar PV on Agricultural Land: Essential Components of Environmental Assessments and Reports'*. Although this guidance is directed at Nationally Significant Solar proposals, however the ISEP advice note offers valuable insights into the cumulative effects assessment of soils.			
NE14	Soils and	Comments on	Natural England has reviewed the Outline Soil	Further information required.	Amber	The **Outline Soil Resource Management Plan (oSRMP) [APP-203]** makes reference to likely

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	Best and Most Versatile Agricultural Land	the Outline Soil Resource Management Plan (EN0110012/ APP/LVS/07. 14)	Resource Management Plan (oSRMP) submitted in support of the proposed Nationally Significant Infrastructure Project. As a statutory consultee, Natural England expects soil and agricultural land impacts to be addressed in a manner that is proportionate to the scale and duration of the project and clearly aligned with the relevant National Policy Statement(s). For projects affecting agricultural land, Natural England expects robust, site-specific soil evidence, clear identification of risks, and enforceable mitigation measures that can be secured through Development Consent Order requirements. We advise that the following additional information is required to ensure that soil resources are adequately protected throughout construction and, where applicable, restored following temporary works. We would expect the Soil Management Plan to be strengthened and appropriately secured in line with this advice to ensure deliverability and long-term soil protection. Natural England welcome that the soil handling methods will be in line with the best practice guidelines set out in IQ (2022) Good Practice Guide and the Defra (2009) Construction Code. We advise that further information should be provided in the oSRMP regarding machinery selection principles to minimise compaction, and how any damaged or compacted soils will be remediated. Natural England note that no information is provided regarding the soil budget, including schedules of volumes for each soil type in situ; the volumes stored; and the volumes to be re-instated. We advise that this information, alongside identification of soil surplus or deficit, should be provided in the oSRMP. We note that 6.2.1 of the oSRMP states that 'the locations of topsoil and subsoil stockpiles will be determined in the detailed SRMP'. We advise that information regarding the location of stockpiles, content, height and management should be provided	We note and welcome that Requirement 17, Schedule 2 secures production of the final Soil Resource Management Plan, and states that this must be in line with the submitted outline document.		plant being excavators, tracked dozers and dump trucks, but does not specifically identify Low Ground Pressure (LGP) vehicles, or machinery of varying sizes, as selection options. The broad principles of machinery selection will be expanded on in the detailed SRMP, as well as acknowledgement of other risk factors, such as smaller vehicles requiring more passes. Paragraph 6.4.4 notes that compaction identified during construction must be remediated prior to panels being fixed to mounting structures, while the ground remains accessible to machinery. This is likely to be done using standard farming/horticultural machinery, for example a small tractor with a subsoiler. Examples of likely equipment to remediate compaction can also be included in an update to the **oSRMP [APP-203]**. The level of detail requested around soil budgets, volumes and siting of stockpiles is unprecedented for an outline SRMP. The Applicant does not propose to include this information until the production of the detailed SRMP. The oSRMP will, however, be updated no later than Deadline 1 to include broad principles of stockpile construction, management, and siting set out in Defra's Construction Code of Practice and to confirm that details of these measures will be set out in the detailed SRMP. Stockpile locations and soil budgets will ultimately be determined in collaboration with other factors such as Landscape and Visual, Biodiversity, and Water Resources and Flood Risk, and will also be developed in line with the detailed CEMP. Paragraph 6.3.2 of the **Outline Soil Resource Management Plan (oSRMP) [APP-203]** refers specifically to reinstatement of soils over the cable. The **Outline Decommissioning Environmental Management Plan (oDEMP) [APP-194]** commits to restoring land to its pre-construction condition throughout Section 2.1, and applies to all agricultural land within the Order Limits. The DEMP will be implemented in conjunction with the detailed SRMP

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			in the oSRMP. Natural England notes that 6.3.2 states that 'soils will be reinstated to the ALC baseline'. It should be clarified whether this statement applies to all land within the Order Limits. Natural England welcome that soils will only be moved when in a 'suitable dry condition', in line with the details outlined in Tables 6-2 and 6-3, and that a 'suitably qualified soil scientists' will be appointed to 'oversee and define all soil management good practice measures set out in the oSRMP'.			The outline DEMP notes that at decommissioning, each of the Solar Development Sites will be restored to the current use, acknowledging that the landowner will decide how the land is to be used and managed, which may be retention of the land as habitat rather than reinstatement of arable production. The outline DEMP also notes that any agricultural field drains affected by the work would be reinstated or replaced, promoting the achievement of the land's pre-construction agricultural use.
NE15	Ancient Woodland and Ancient Veteran Trees	**Damage/loss of habitat (C) and (0)**	Natural England and the Forestry Commission have produced Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK (www.gov.uk) (standing advice) for decision makers. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a Site of Special Scientific Interest or in exceptional circumstances. Appendix 16.2 Arboricultural Impact Assessment states that a 15m buffer will be implemented for Ancient Woodland sites, which is in line with our guidance. It was also identified that nine veteran or ancient trees were identified within the order limits. It has been confirmed that none will be removed to facilitate development. However it must be ensured that indirect impacts to the trees are avoided, based on the measures outlined in Natural England's standing advice. We have no further comments to make on this topic.	N/A	**Green**	The Applicant notes this comment.

Environment Agency

ID	Theme	Issue	Comment			Applicant's Response
EA01	Electromagnetic Fields	Electromagnetic Fields	Appendix 16.6 EMF Report [APP-188], Section 6.1 and Table 8	Issue:	Insufficient detail provided regarding the possible impact of EMFs on fish.	The assessment (**ES Volume 3, Appendix 16.6: EMF Report [APP-188]**) considers a single 3-core cable. This is considered to present a worst-case for assessment given that there is currently no commitment to a particular cable configuration; other options such as a flat formation or trefoil would result in lower values for EMFs. The values provided in Table 8 have been generated based on the aforementioned design and a current of 1000 Amps. This is another worst-case assumption, as current in the cables will vary in accordance with the power carried by the cable at any given time (when power transmission is below peak, the current in the cables will decrease). As stated in **Appendix 16.6: EMF Report [APP-188]** the residual magnetic field strength from 275kV cables under watercourses has been calculated to be 14.72µT. This represents a net EMF of ~65 µT though as stated above this is based on several worst-case assumptions and is therefore likely to overestimate the extent of residual EMFs. It is noted that research suggests Anguillid sp. will sense the residual EMFs. This is the assumption in the biodiversity assessment (**ES Volume 1, Chapter 6: Biodiversity [APP-044**]). The assessment for European eel is summarised in paragraphs 6.9.334 and 6.9.335 which state: "*Based on available literature and as outlined above, the potential for European eel (both juveniles migrating upstream, eels residing in the vicinity of the cable, and adult 'silver' eels migrating downstream) to sense residual EMFs above the cable crossing cannot be ruled out entirely. However, this potential effect is very localised and migrating eels will respond to other environmental (e.g. flow/tidal) and olfactory (salinity gradients / water chemistry) cues, in addition to EMFs. There is no evidence that suggests EMFs, particularly at the levels predicted, present a behavioural barrier to migrating eels and based on the evidence available any change in behaviour in response to EMFs (e.g. minor migration delay or slight variation in direction) is likely to be minor, especially given the constrained nature of the channel which is only approximately c.55 m in width. In summary, following the implementation mitigation (burying the cable at a minimum distance of 5 m below the bed level), it is considered that any potential adverse effects on European eel during operation would be expected to be negligible and not significant in EIA terms.*"
				Impact:	Risk of the Proposed Development impacting fish.	
				Solution:	The Applicant should clarify: • If the assessment considers the cable design and arrangement (i.e. flat formation, trefoil or single 3- core cable). In certain arrangements the EMFs from cables can be cancelled out or reduced. If the values in Table 8 correlate with the same cable specifications proposed, such as the current Alternating Current (AC) and Direct Current (DC) cables and their arrangement.	
			Additional comments:		The residual magnetic field strength from 275kV cables under watercourses will be 14.72µT, measured at the bed of the river. This assumes a burial depth of 5m. Natural background magnetic levels are ~50µT, which means the cable(s) will increase magnetic strength from background levels by ~29%. There is evidence that Anguillid sp. (Anguilla japonica) can detect magnetic fields as low as 12 µT, which suggests that European eel may also be sensitive to similar strengths. Table 8 suggests that the assessment has taken in to account the area over which EMFs from cables will be felt. We note that the field level data for various cable configurations has been sourced from EMF.info, but it is not clear whether they represent options for configurations for	

				the Proposed Development.		The useful study referenced on *Anguilla japonca* (Nishi, T., *et al.* 2005) suggesting that this species responds to EMF as low as 12,663 nT (or 12.6 µT) further supports the assessment made in **ES Chapter 6: Biodiversity [APP-044]** that concludes that European eel will likely sense the residual EMF but will not be adversely affected. In regard to the assumption that a 5 m burial depth of cable will be used, the Applicant is committed to avoiding impacts but there needs to be some degree of flexibility to reflect the latest thinking on mitigation at the time of construction which still ensure that there are no significant effects to migrating lamprey. To cater for this flexibility, the **Outline Construction Environmental Management Plan (oCEMP) [APP-192]** will be updated no later than Deadline 1 to provide that the detailed CEMP will need to set out the EMF mitigation measures that have been deployed (including the depth of cabling) across the Proposed Development and explain how that has taken account of the latest research and practice on this matter. The detailed CEMP will be written in consultation with the Environment Agency and Natural England. The **Design Parameters and Commitments document [APP-217]** will be updated no later than Deadline 1 to take account of the above, noting that such flexibility could, but does not have to, include measures such as protective covers and 5m+ depths but would take account of the latest research and practice on this matter.
ID	**Theme**	**Issue**	**Comment**			**Applicant's Response**
EA02	Biodiversity and Ecology	Fish eDNA Survey	Appendix 6.5 Fish Habitat Assessment and eDNA Survey (Aquatics Report) [APP-155], Sections 3.2.20 to 3.2.26, Table 2-2	Issue:	The fish habitat assessment concludes that the Hagg Lane Drain and Mearley Drain are unsuitable for fish and have therefore been scoped out of the eDNA survey. It has not been clearly demonstrated that this is an acceptable approach.	eDNA sampling was targeted at watercourse crossings where impacts could occur, as agreed during consultation with the EA (04 March 2025). Mearley Drain is not crossed by the Proposed Development and impacts will be avoided through a 10 m buffer within Solar Development Site 4. Hagg Lane Drain is crossed by the lower voltage 33kV cable alignment; however, it is envisaged this watercourse will be crossed using an existing crossing. As no impact pathways to these watercourses are anticipated, the level of baseline data collection and consideration of the
				Impact:	It is possible that fish could be present in these watercourses and could be detrimentally impacted.	
				Solution:	The Hagg Lane Drain and Mearley Drain should both be	

					included in the fish eDNA survey, unless further sufficient evidence can be presented that would support the initial findings of the fish habitat assessment.	desk study position is proportionate to inform the EIA of impacts to these watercourses. The EA will be provided with grid references for each survey location. A figure showing survey locations in relation to the draft Order Limits and project components is already provided as **ES Volume 2, Figure 6.12: Fish Habitat Assessment, EA Monitoring Locations and eDNA Survey Locations [APP-083]**.
			Additional comments:	Where there is an insufficient baseline to inform the Environmental Impact Assessment (EIA), impact-pathways to receptors may not be fully assessed. Whilst we agree that waterbodies that lack water are unsuitable for fish, we do not agree with the conclusion that the Hagg Lane Drain and Mearley Drain are unlikely to support fish due to poor habitat. Both of these waterbodies have hydrological connectivity with the River Aire. While we acknowledge that fish passage for European eel may be hindered by the pumping station on the Mearley Drain, the eDNA results for Selby Dam demonstrate that the presence of a pumping station does not necessarily preclude European eel. It would be useful if Table 2-2 could be updated to include grid references for each survey location. The provision of a map showing the locations would also be welcomed. Both would assist the reader in understanding where surveys have been undertaken in relation to the draft Order Limits.		

ID	Theme	Issue	Comment			Applicant's Response
EA03	Biodiversity and Ecology	Fish Spawning and Migration Periods	Outline Construction Environmental Management Plan [APP-192], Table 3-3	Issue:	Noncommittal wording (e.g. "where practicable") has been used to describe the implementation of mitigation measures relating to avoiding periods of fish spawning and migration when conducting noisy construction activities.	"Where practicable" will be removed from Table 3-3 within the **Outline Construction Environmental Management Plan (oCEMP) [APP-192]** no later than Deadline 1 and replaced with the following text *"Timing of construction works expected to substantially increase noise and vibration around watercourses (expected to be HDD, vibro-rolling and press/push installation of solar frames) to be out with periods of fish spawning and migration or noise mitigation provided, unless otherwise agreed with the EA."* In addition, the **oCEMP [APP-192]** will be updated

				Impact:	Risk of the Proposed Development impacting fish spawning and migration if this ambiguity is carried through to management plans post-consent, resulting in mitigation measures not being implemented.	to state that "*Consultation with the EA and Natural England on the timings and construction methodology of construction in the vicinity of the River Ouse and Selby Dam will be undertaken, specifically to identify works outside of sensitive migratory periods for lamprey, European eel, Atlantic salmon and sea trout. The timing of avoidance periods would be agreed in consultation with the EA. However, it is assumed that the core spring migrations and the core winter spawning migration will be avoided, unless otherwise agreed with the EA.*"
						
						The **oCEMP [APP-192]** will be updated no later than Deadline 1 to cover the mitigation that was already included in **ES Volume 1, Chapter 6: Biodiversity [APP-044]**, to include the following "*The design and installation of temporary crossings and culvert structures on Selby Dam and Habholme Dyke, if required, will ensure that fish passage is maintained for the duration of construction. Temporary watercourse crossing designs will facilitate the free movement of fish across a range of flow conditions and will seek to maintain, as far as practicable, the existing aquatic habitats and underlying fluvial geomorphological processes that influence habitat distribution and quality within both watercourses.*"
						In any event, the **oCEMP [APP-192]** provides that the detailed CEMP must provide measures to protect biodiversity for open cut crossings (Table 3-3) and the Environment Agency will be consulted on the detailed CEMP.
						
						As set out in **ES Volume 3, Appendix 15.2: Water Environment Regulations (Water Framework Directive) Compliance Assessment [APP-180]**, the following intrusive crossings on watercourses have been assumed for the assessment:
						
						- Temporary crossings:
						  o 17 Ordinary Watercourses in total, all classified as low receptor value within the WER assessment:
						  ▪ 16 watercourses associated with open cut cable methods
						  ▪ 1 watercourse associated with a temporary access road
						- Permanent crossings:
						  o 2 Ordinary Watercourses:
						  ▪ 1 low value watercourse associated with a new access road culvert

				Solution:	Table 3-3 (along with any other relevant documents) should be updated so that it clearly commits to avoiding carrying out noisy construction activities during fish spawning and migration periods where there are impact- pathways to fish receptors. If such a commitment is not possible, it should be clearly outlined and justified where and when this may not be the case and the impacts of this risk-assessed and mitigated.	
			Additional comments:	We note that the Outline Construction Environmental Management Plan (CEMP) does not provide any detail regarding the management of or mitigation for works involving watercourse crossings (except for trenchless crossings). The Applicant should confirm if there are any permanent or temporary crossings proposed which will be intrusive to watercourses (including Ordinary Watercourses and Main Rivers). If this is the case, management and mitigation for fish and aquatic ecology must be detailed in the outline CEMP.		

						▪ 1 moderate value watercourse (Habholme Dike) associated with a new access road culvert ○ 1 Main River: ▪ 1 high value watercourse (Selby Dam) – replacement of an existing culvert with a new crossing structure (worst case scenario) Watercourse receptor values can be found in Table 2-1 of **ES Volume 3, Appendix 15.2: Water Environment Regulations (Water Framework Directive) Compliance Assessment [APP-180]**.
ID	**Theme**	**Issue**	**Comment**			**Applicant's Response**
EA04	Biodiversity and Ecology	Lamprey Migration Period	Chapter 6: Biodiversity [APP-044], Sections 6.9.250 and 6.9.251	Issue:	Incorrect migration period stated for river lamprey and sea lamprey.	The **Outline Construction Environmental Management Plan (oCEMP) [APP-192]** and the **Shadow Habitat Regulations Assessment (sHRA) [APP-223]** will be updated no later than Deadline 1 to reflect recommended period to undertake HDD. These updates will commit to undertaking HHD under the River Ouse between July and September, unless otherwise agreed with the EA, to avoid the avoid sensitive times for fish.
				Impact:	Risk of construction works impacting river lamprey and sea lamprey if the incorrect migration period is used when programming construction works.	
				Solution:	Relevant documents should be updated to include the correct river lamprey and sea lamprey migration periods.	
			Additional comments:	Adult river lamprey migration in the River Ouse is typically October through to end of February. Typical sea lamprey migration is from April to end of July. A sensible precautionary approach to complete Horizontal Directional Drilling (HDD) works to avoid sensitive times for fish would be between July and September.		
ID	**Theme**	**Issue**	**Comment**			**Applicant's Response**
EA05	Biodiversity and Ecology	Atlantic Salmon Egg Incubation Period	Chapter 6: Biodiversity [APP-044], Section 6.9.252	Issue:	Incorrect egg incubation period stated for Atlantic salmon.	**ES Volume 1, Chapter 6: Biodiversity [APP-044]** does not state a period for salmonid egg incubation. Paragraph 6.9.259 states: "*For Atlantic salmon/brown trout, peak avoidance periods for migration are between October and February, noting that spawning/incubation habitat is absent.*" Egg incubation period is irrelevant for this assessment as habitats affected are unsuitable for salmonid spawning, hence reference being made to the core migration period.
				Impact:	Risk of construction works impacting Atlantic salmon if the incorrect egg incubation period is used when programming construction works.	

				Solution:	Relevant documents should be updated to include the correct Atlantic salmon egg incubation period.	
			Additional comments:			
ID	**Theme**	**Issue**	**Comment**			**Applicant's Response**
EA06	Biodiversity and Ecology	Culverts	Chapter 6: Biodiversity [APP-044], Sections 6.9.143, 6.9.262 and 6.9.264 Appendix 15.2: Water Environment Regulations (Water Framework Directive) Compliance Assessment [APP-180], Section 5.2.4	Issue:	Culverts may be proposed on watercourses, including the Selby Dam.	**Otter** There is only one location within the Order Limits where a watercourse providing high value habitat for otter may have a temporary culvert in place. Namely, the Solar Development Site 8 Access, where an existing crossing over Selby Dam is located. If this access option into Solar Development Site 8 is utilised, it is likely the existing crossing will be used, and the footprint of the culvert will be maintained, resulting in no additional impacts to otter. However, as a worst-case scenario, the existing culvert may need replacing with a new crossing structure. Additionally, this culvert provides access for a farm track currently, with very little road traffic using the culvert, and as the possible culvert will only be used during construction, any increases in traffic because of the development will be temporary. As such, the impacts of additional culverts within the Order Limits on otter would be minimal/negligible even considering the worst-case scenario. However, any replacement culverts over Selby Dam, or newly created culverts over ditches within the Order Limits (which are of low/negligible value to otter) will be designed to ensure they allow for passage of mammals. This detail will be added to the **Outline Construction Environmental Management Plan (oCEMP) [APP-192].** **Fish** For permanent crossings of higher value watercourses for fish, the use of open span structures will be considered at detailed design stage. This will be able to be considered by the LLFA, relevant IDB or the EA (dependent on the water course in question) pursuant to the Protective Provisions in the DCO. It is noted that the **Design Parameters and Commitments document [APP-217]**, secured via DCO Requirement, secured that the design of watercourse crossings will also maintain a natural watercourse bed where reasonably practicable. **WER Compliance Assessment**
				Impact:	Impacts of culverts include loss of natural morphological processes, impacts on fish migration and habitat and habitat fragmentation. Culverts also put an added pressure on otters during periods of high water-levels, as culverts offer little room for conveyance and put otters at risk of being killed when crossing roads.	
				Solution:	Any culvert replacement should be replaced with a clear span bridge to improve aquatic habitat and connectivity. Consideration should be given to using clear span bridges instead of culverts for any new proposed watercourse or ditch crossing and justification provided where culverts are still proposed.	
			Additional comments:	Existing watercourse crossing points should also be improved for ecology wherever possible, ideally by the removal of a culvert and replacement with an open-span bridge. Where this is not possible it should be ensured it adequately allows for passage of mammals and fish. We would expect the natural bed of the watercourse to be		

				preserved, and for the entrance and exit of the culvert to be free from any head difference to the bed of the watercourse. We would encourage habitat creation to include the Selby Dam watercourse which will be crossed for site access as well as crossed by the Cable Route Corridor. Furthermore, any habitat improvement works should also look to include opportunities to improve fish passage on the Selby Dam.	As stated in **ES Volume 3, Appendix 15.2: Water Environment Regulations (Water Framework Directive) Compliance Assessment [APP-180]**, use of a culvert as a crossing structure will be a worst case scenario, and a natural watercourse bed will be maintained wherever reasonably practicable. We have chosen to assess the worst case to ensure a conservative assessment. The majority of crossing structures are expected to be located on low value watercourses with little or no baseflow so likely to be largely disconnected from the main WFD river and main tributaries and therefore have a negligible impact to WER status at the scale of the water body. Specifically for Selby Dam a worst case scenario has been assessed that the existing culvert may need to be removed and then replaced with a new culvert. The replacement culvert would need to be designed to current standards and is therefore likely to be slightly better than currently in place. The additional access culvert required on Habholme Dike is likely to result in a minor localised adverse impact which is not expected to result in a change to status at the scale of the water body. The type of crossing structure to be used will be considered at detailed design stage and the EA will be able to consider the detailed design of the Selby Dam crossing structure pursuant to the Protective Provisions included within the **Draft Development Consent Order (DCO) [APP-017].**

ID	**Theme**	**Issue**	**Comment**			**Applicant's Response**
EA07	Biodiversity and Ecology	Open-Cut Trenching	Appendix 15.2: Water Environment Regulations (Water Framework Directive) Compliance Assessment [APP-180], Section 5.2.4 Outline Construction Environmental Management Plan [APP-192], Table 3-3	Issue:	Open-cut trenching will be used to cross low value watercourses including ditches, but there is no consideration of how this could impact mammals.	Mitigation measures to protect biodiversity, including covering open trenches to prevent wildlife from falling in and using ramps to enable wildlife to escape, is already included within Table 3-3 of the **Outline Construction Environmental Management Plan (oCEMP) [APP-192]**, on Page 26. The following sentence will be added to Table 3-13 of the **oCEMP [APP-192]** "*Reinstalment methods for bankside habitat will be developed as part of the scheme design, including sowing of species rich sward.*"
				Impact:	If the open-cut trenching extends to the land, trenches associated with cable installation present a risk of entrapment of mammals such as otters.	
				Solution:	The outline CEMP should be updated to include specific	

					mitigation measures to protect biodiversity. Measures should include, but not be limited to covering open trenches to prevent wildlife from falling in and using ramps to enable wildlife to escape.	
			Additional comments:	Although our preference is for HDD to be used over open-cut trenching to cross watercourses, we have agreed that this is acceptable on certain watercourses. We consider this to be a pragmatic solution if all precautions are taken given that open cut trenching still has the potential to have a detrimental impact on mammals. Reinstatement of bankside habitats along watercourses and ditches should be considered after completion of works. This could include sowing the bankside habitats with a species-rich locally appropriate sward, and erecting fencing to prevent livestock access.		
ID	**Theme**	**Issue**	**Comment**			**Applicant's Response**
EA08	Biodiversity and Ecology	Otter and Water Vole Mitigation During Decommissioning	Outline Decommissioning Environmental Management Plan [APP-194], Table 3-3 Outline Construction Environmental Management Plan [APP-192], Table 3-3	Issue:	Omission of otters and water voles from Table 3-3.	Noted, thank you. Otter and water vole avoidance and mitigation measures will be added to the **Outline Decommissioning Environmental Management Plan (oDEMP) [APP-194]** no later than Deadline 1.
				Impact:	Risk of the decommissioning works negatively impacting riparian mammals, especially if decommissioning involves removal of any watercourse crossings or the extraction of the cables.	
				Solution:	Commit to enact similar avoidance and mitigation measures during the decommissioning phase that are in place for the construction phase and detailed within Table 3-3 of the outline CEMP.	
			Additional comments:			

ID	Theme	Issue	Comment			Applicant's Response
EA09	Water Resources and Flood Risk	Wheel Washing	Outline Operational Environmental Management Plan [APP-193], Section 2.7.2	Issue:	The Outline Operational Environmental Management Plan (OEMP) states that there will be wheel wash facilities, but it does not explicitly state that vehicles will be washed prior to entering the site. There is also no mention of how wash water will be collected and disposed of.	The **Outline Operational Environmental Management Plan (oOEMP) [APP-193]** will be updated no later than Deadline 1 to include further details of how wash water will be managed to ensure contaminants do not enter local watercourses. The exact containment method will be finalised at detailed design stage and set out in the detailed OEMP. Further details will be added to the **oOEMP [APP-193]** to set out that wheel washing will take place on entry to the site where conditions require washing to be undertaken.
				Impact:	Risk of vehicles spreading INNS and decreasing water quality if runoff containing contamination and sediment is allowed to enter surface watercourses.	
				Solution:	The outline OEMP should be updated to include details of how wash water will be managed and disposed of. Moreover, it would be our preference that wheel washing occurs upon entering and exiting the site.	
			Additional comments:	Mitigation measures associated with wheel washing facilities could include: Ensuring these activities will be undertaken within a designated impermeable or lined area and should not be allowed to discharge into a watercourse. Any Sustainable Drainage Systems (SuDS) incorporated around wheel washing facilities should provide sufficient treatment for suspended sediment, metals and hydrocarbons. There is a risk that the vehicles could bring INNS (if seeds are present for example) onto the site. Similarly, if the dirty water from wheel washing is not contained, there is a further risk of spreading INNS. This would be especially concerning if the washing facilities are located near main and ordinary watercourses, as dirty water could enter watercourses which risks the spread of		

				INNS. To prevent the accidental introduction of INNS to the site, biosecurity measures such as using a biosecurity disinfectant could be enforced.		
ID	**Theme**	**Issue**	**Comment**			**Applicant's Response**
EA10	Water Resources and Flood Risk	Foul Waste	Appendix 15.2: Water Environment Regulations (Water Framework Directive) Compliance Assessment [APP-180], Table 7-1 Appendix 15.4 Outline Drainage Strategy (ODS) [APP-182], Section 5.5.13 Outline Construction Environmental Management Plan [APP-192], Tables 3-13 and 3-14 Outline Operational Environmental Management Plan [APP-193], Section 2.2.12 and Table 3-13 Outline Decommissioning Environmental Management Plan [APP-194], Table 3-12	Issue:	Insufficient detail provided regarding the fate of foul water.	The **Outline Construction Environmental Management Plan (oCEMP) [APP-192], Outline Operational Environmental Management Plan (oOEMP) [APP-193], Outline Decommissioning Environmental Management Plan (oDEMP) [APP-194]** and **ES Volume 3, Appendix 15.4: Outline Drainage Strategy (ODS) [APP-182]** will be updated no later than Deadline 1 to include further details of how foul water will be managed to ensure contaminants do not enter local watercourses. The discrepancies between the documents on foul water and effluent will be corrected. With these measures in place, it is considered that the Proposed Development will not impact upon the current or future status of any WER waterbody. Table 7-1 within **ES Volume 3, Appendix 15.2: Water Environment Regulations (Water Framework Directive) Compliance Assessment [APP-180]** will be updated no later than Deadline 1 to consider potential impacts from welfare facilities / risks from foul water.
				Impact:	Risk of foul water entering the receiving water environment and causing a reduction in water quality if foul water is not adequately treated and disposed of.	
				Solution:	The outline CEMP, outline OEMP and outline DEMP should be updated to include the method of foul water containment and disposal. Table 7-1 within the Water Environment Regulations (Water Framework Directive (WFD)) Compliance Assessment should be updated to identify any risks from foul water.	

			Additional comments:	No detail is given regarding how foul waste will be contained and disposed of throughout construction. There is a lack of clarity regarding foul waste during operation and decommissioning. Table 7-1 on the topic of Permanent components of the Proposed Development and their potential effects on surface water bodies does not include any impact from welfare facilities. We acknowledge that there are similarities between Table 3-13 of the outline OEMP and Table 3-12 of the outline DEMP, however there are differences in wording. Table 3-14 states foul water will be "appropriately collected in sealed storage tanks", whilst Table 3-12 states effluent would be "within drainage features such as tanks, pumps, or septic systems". • Section 5.5.13 of the Outline Drainage Strategy (ODS) states wastewater from welfare facilities will be contained in a septic tank before being disposed of by a licensed waste contractor in accordance with regulatory requirements as and when required by tanker. If septic tanks are used, permits may be required if they discharge to the water environment and guidance should be followed: Septic tanks and sewage treatment plants: what you need to do: Overview - GOV.UK.	

ID	Theme	Issue	Comment			Applicant's Response
EA11	Water Resources and Flood Risk	Sealed Drainage System	Chapter 15: Water Resources and Flood Risk [APP-053], Section 15.8.2 & 15.8.3 Appendix 15.4 Outline Drainage Strategy (ODS) [APP-182], Sections 5.4.10 & Section 5.5.3 Outline Operational Environmental Management Plan [APP-193], Table 3-13	Issue:	There is no firm commitment to the use of a fully sealed drainage system at the BESS. The Maximum Design Scenario for the BESS and Substations includes piled foundations to a maximum depth of 15 mbgl. The ODS states that the proposed foundation types are not expected to materially affect the surface water drainage	**ES Volume 3, Appendix 15.4: Outline Drainage Strategy (ODS) [APP-182]**, the **Outline Operational Environmental Management Plan (oOEMP) [APP-193]** and the **Outline Battery Safety Management Plan (oBSMP) [APP-196]** will be updated no later than Deadline 1 to clarify that the BESS drainage system will be fully sealed. For clarity, the term 'sealed' in relation to the BESS drainage system refers to a fully lined external drainage system designed to prevent uncontrolled runoff or discharge entering the environment. During normal operation, controlled positive discharge will occur from the drainage system; during an incident, the system will be isolated to prevent discharge and retain potentially contaminated runoff

			Outline Battery Safety Management Plan [APP-196], Section 4.5.6		design or assessment at the ES stage, however it is unclear how this conclusion has been reached.	as reflected in **Appendix 15.4: Outline Drainage Strategy (ODS) [APP-182]** and the **oBSMP [APP-196].** With regard to piled foundations, the Applicant confirms that the use of piles would not compromise the creation of a fully lined drainage system. Piled foundations, where required, would be installed as part of the foundation works and the sealed drainage/containment system would be formed separately as part of the surface drainage design. Piles would not be installed through an impermeable liner. The detailed drainage design will confirm the construction details and sequencing necessary to maintain the integrity of the drainage and firewater containment systems, including any local detailing around foundations, chambers, ducts or other infrastructure. **ES Volume 3, Appendix 15.4: Outline Drainage Strategy (ODS) [APP-182]** will be updated no later than Deadline 1 to set out that the detailed drainage strategy must include these details.
				Impact:	There is a risk of contaminated firewater entering groundwater and polluting controlled waters, if the BESS drainage system and associated piling is not fully sealed and impermeable.	
				Solution:	Relevant documents should be updated to commit to the use of a fully sealed and impermeable drainage system at the BESS. Further information should be provided to demonstrate how it will be ensured that the piled foundations will not compromise the creation of a fully impermeable drainage system.	
			Additional comments:	Section 5.4.10 of the ODS and Section 4.5.6 of the Outline Battery Safety Management Plan (BSMP) state that "Secondary containment systems may take the form of impermeable lagoons or tanks", however, this could be interpreted as uncertainty over containment of firewater. Table 3-13 of the outline OEMP states firewater will "be retained within a lined, bunded drainage system, with no uncontrolled discharge". For consistency purposes, we recommend that this is updated to clarify that it will be impermeable lining. Item 9 of the measures outlined in Section 15.8.2 Chapter 15 includes a statement that runoff will be contained within an impermeable, bunded lagoon and controlled via a penstock chamber. It should also be made unambiguous that the full drainage system at the BESS would be impermeable.	

ID	Theme	Issue	Comment			Applicant's Response
EA12	Water Resources and Flood Risk	Valves and Penstocks	Chapter 15: Water Resources and Flood Risk [APP-053], Section 15.8.2 Appendix 15.4 Outline Drainage Strategy (ODS) [APP-182], Section 5.4.10 Outline Operational Environmental Management Plan [APP-193], Table 3-13 Outline Battery Safety Management Plan [APP-196], Sections 4.3.1 and 4.5.5 Appendix 15.2: Water Environment Regulations (Water Framework Directive) Compliance Assessment [APP-180], Section 7.4.28	Issue:	Insufficient detail provided regarding the automatic self-actuating valves, their maintenance schedule and fire suppression systems. Automatic penstock valves not being identified as a mitigation measure within the WER Compliance Assessment, despite being mentioned to varying degrees in other documents.	The **Outline Battery Safety Management Plan (oBSMP) [APP-196]** includes details of the proposed maintenance schedule within paragraphs 3.3.10 to 3.3.13 including for safety systems such as fire systems. The **oBSMP [APP-196]** states in paragraph 4.5.6 that a manual back-up shut-off valve system allowing for redundancy will be integrated into the Proposed Development. Reference to information included within the **oBSMP [APP-196]** on automated fire suppression systems and shut-off valves will be added to **ES Volume 3, Appendix 15.2: Water Environment Regulations (Water Framework Directive) Compliance Assessment [APP-180]** no later than Deadline 1 . A commitment to include automated fire-suppression systems is not included within the **oBSMP [APP-196]** as BESS can be designed to safely burn out to remove the risk of stranded energy in the battery systems as outlined within paragraph 1.3.12. See paragraphs 1.3.12 and 1.3.13 for further details. The wording *"regular checking and maintenance of penstocks"* from the **Outline Operational Environmental Management Plan (oOEMP) [APP-193]** will be added to the **oBSMP [APP-196]** and **ES Appendix 15.4 Outline Drainage Strategy (ODS) [APP-182]** no later than Deadline 1. The wording within Section 5.4.10 of **ES Appendix 15.4 Outline Drainage Strategy (ODS) [APP-182]** is consistent with the **oBSMP [APP-196]**. The wording used on the use of penstocks, automated shut-off valves and self-actuating valves will be made consistent across all documents. The type of isolation device is currently specified as a valve in **ES Appendix 15.4 Outline Drainage Strategy (ODS) [APP-182]** and **oBSMP [APP-196]**, whereas a penstock is specified in the **oOEMP [APP-193]**. These are two types of isolation devices. For consistency and to retain flexibility, all relevant documents listed in EA12 will be updated to *"drainage isolation device".* The firewater containment strategy is defined by the following principles, which will be reflected in the updated **oBSMP [APP-196]** which will be updated to include similar wording to the below:
				Impact:	Risk of the self-actuating valves seizing up and not being able to close in the event of a fire, if a maintenance schedule is not in place. Maintenance schedules are essential to ensure that they can close quickly when required which will stop any contaminated water deteriorating water quality of the local watercourses.	
				Solution:	The outline BSMP should be updated to confirm that there will be a valve maintenance schedule and to specify that the valves can also be manually closed, if required. The language used to describe these details should be consistent across all documents. Chapter 15 should be updated so that it commits to fitting BESS with automated fire-suppression systems.	

					Any mention of a penstock in other documents should also be mentioned in the WER assessment.	"• *All firefighting water and incident runoff is retained on site during an incident with no uncontrolled discharge.* • *The drainage system transitions automatically to containment mode using drainage isolation devices upstream of outfalls on activation of the fire alarm.* • *Containment is achieved within engineered drainage and storage features designed to provide full containment forming part of the BESS drainage design.* • *The system accommodates firefighting water volumes together with rainfall during the incident.* • *The design does not rely on infiltration or uncontrolled overflow during incident conditions.* • *Retained water is subject to inspection and testing prior to disposal.* • *Provision is made for active management of retained water, including tanker removal where required.* *Fire water runoff will be managed as a discrete drainage catchment and controlled via a drainage isolation device upstream of the outfall or an equivalent point of connection. Isolation will be capable of automatic activation (from the BESS fire alarm system) during an incident, with manual override provided as a secondary control. Drainage isolation devices will be designed to operate on a failsafe basis, such that in the event of power loss, system fault or damage during an incident, the default position is closed to maintain containment. Power supply arrangements may include independent or solar-backed systems where appropriate, ensuring that valve operation is resilient and not reliant solely on the primary site power infrastructure.* *The approach is performance based, focused on impermeability where required, isolation capability and controlled management of runoff, including incident response and firewater, with the detailed configuration to be confirmed at detailed design stage. Isolation controls shall be subject to a documented inspection, testing and maintenance regime. This shall include defined test frequency in the approved Battery Safety Management Plan (BSMP), an inspection checklist, record keeping of tests and inspections, defined remedial actions where defects are identified, and an escalation procedure where a test failure is recorded."*
			Additional comments:	Sections 4.3.1 (7) and 4.5.5 of the outline BSMP mention automatic self-actuating valves, but it is unclear if these valves can also be manually closed and if there will be a maintenance schedule. Section 15.8.2 (10) of Chapter 15 states BESS may be fitted with automated fire-suppression systems, but there is no commitment to this. We recognise that "regular checking and maintenance of penstocks" is included in Table 3-12 of the outline OEMP, but this should also be included in the outline BSMP and ODS. We note that Section 5.4.10 of the ODS states that there will be "automated shut-off valves that are linked to the BESS fire alarm system", and that "a manual back-up shut-off valve system allowing for redundancy will also be integrated". However, this information should be consistent with the outline BSMP. Furthermore, we suggest that language should be used consistently across documents. Whilst there are similarities between penstocks, automated shut-off valves and self-actuating valves since they are all used for controlling water, they can be considered to differ in their application. We recognise that self-actuating or automated valves may be preferred due to their automatic operation, however we would seek clarification, likely at the detailed design stage, on reliability of closing success.	

ID	Theme	Issue	Comment			Applicant's Response
EA13	Water Resources and Flood Risk	BESS and Substation Drainage	Outline Construction Environmental Management Plan [APP-192], Table 3-13 Outline Operational Environmental Management Plan [APP-193], Table 3-13 Appendix 15.2: Water Environment Regulations (Water Framework Directive) Compliance Assessment [APP- 180], Section 7.4.28	Issue:	Insufficient detail regarding BESS and substation drainage has been provided in the outline CEMP and OEMP. The WER report describes mitigation measures at the proposed BESS facility to prevent firefighting pollutants but no details around this for the Substation.	Drainage during construction is outlined within Section 5.7 of **ES Volume 3, Appendix 15.4: Outline Drainage Strategy (ODS) [APP-182]**. Table 3-13 of the **Outline Construction Environmental Management Plan (oCEMP) [APP-192]** will be updated no later than Deadline 1 to include all relevant drainage information from **ES Appendix 15.4: Outline Drainage Strategy (ODS) [APP-182]**. Relevant operational drainage details will be added to Table 3-13 in the **Outline Operational Environmental Management Plan (oOEMP) [APP-193]** no later than Deadline 1. In relation to **Appendix 15.2: Water Environment Regulations (Water Framework Directive) Compliance Assessment [APP- 180],** mitigation measures to be employed at the substation in relation to managing pollution to surface water in the event of a spill/leak (as a result of any incident) are discussed in 7.4.10 and 7.4.11 of the report, and is noted within the report to be covered within **Appendix 15.4: Outline Drainage Strategy (ODS) [APP-182]** (referenced within the report). **Appendix 15.4: Outline Drainage Strategy (ODS) [APP-182]** documents the relevant design mitigation measures within Section 5.5 for substations and transformers in relation to managing pollution in the water environment in the event of a spill/leak. The Applicant notes that automatic drainage isolation devices are already proposed at the outfall(s), linked to the fire alarm system to isolate drainage in the event of a fire incident. The Applicant understands the EA's reference to 'sentinel' monitoring to relate to additional water quality monitoring sensors at outfalls from BESS and Substations. This will be considered at detailed design stage as part of the final drainage strategy. The text within Section 7.4.29 of **Appendix 15.2: Water Environment Regulations (Water Framework Directive) Compliance Assessment [APP- 180]**, will be updated no later than Deadline 1 to include a sentence to signpost the reader to Section 7.4.10 and 7.4.11 of the WER Assessment to show that the surface water mitigation measures associated with spills/leaks for substations have been included. However, the same measures included within the BESS in relation to a fire event would not be employed at the sub-stations as it is assumed that the mitigation measures
				Impact:	Risk of deteriorating water quality if contaminated firewater is not contained and removed offsite sufficiently. Risk of contaminants reaching groundwater or surface waters via runoff if suitable lining and containment measures (such as automatic shutoff valves) are not used in the BESS and Substations drainage systems.	
				Solution:	The documents should be updated to specify drainage details associated with the BESS and substation. Details should include (but should not be limited to): Use of a sealed drainage system with automatic shutoff valves which will be managed in the event of a fire or pollution incident Use of bunding around the transformer units at the substation.	
			Additional comments:	Table 3-13 of the outline CEMP states that BESS, substations and construction compounds will have "*appropriate drainage design",* but the appropriateness currently		

				cannot be assessed as drainage design is unknown during construction phase. Table 3-13 of the outline OEMP does not specify using penstocks or bunding transformers in the substation. Containment measures may include impermeable bunding, lined drainage beneath all plant containing hazardous and polluting substances, and the use of oil-water separators as part of the drainage system. All fuel and oils must be stored in accordance with relevant legislation such as The Control of Pollution (Oil Storage) (England) Regulations 2001. We note that further detail on pollution containment at the Substation sites is provided in Volume 3, Appendix 15.4 Section 5.5. Infiltration drainage is proposed as the preferred discharge option for BESS and Substation drainage systems. Section 5.2.2 of the ODS outlines the preferred order of priority for discharge of surface water: Collection for non-potable use; Discharge into the ground (infiltration); Discharge to a surface water body; Discharge to a surface water sewer, or other surface water system; and Discharge to a combined sewer Contaminants entering groundwater would be difficult to detect following infiltration, and managing any pollution following loss to ground would be difficult. The monitoring protocols should ensure that early detection and intervention can take place to avoid operational spills and leaks from impacting controlled waters. We recommend the Applicant considers the use of automated 'sentinel' monitoring systems at the	associated with preventing leaks/spills to surface water will prevent groundwater contamination.

				outfall(s) from BESS and Substation areas in addition to routine inspection of bund and other pollutant containment systems within these compounds.		
ID	**Theme**	**Issue**	**Comment**			**Applicant's Response**
EA14	Water Resources and Flood Risk	Testing of Firewater	Appendix 15.4 Outline Drainage Strategy (ODS) [APP-182], Sections 5.4.7 and 5.4.11 Outline Battery Safety Management Plan [APP-196], Sections 4.3.1 and 4.5.8	Issue:	Insufficient detail provided regarding testing of any contained runoff following a fire at a BESS compound.	**ES Volume 3, Appendix 15.4: Outline Drainage Strategy (ODS) [APP-182],** and the **Outline Battery Safety Management Plan (oBSMP) [APP-196]** will be updated no later than Deadline 1 to include specific detail around water quality testing for BESS firewater runoff in line with the EA's requests. **Appendix 15.4 Outline Drainage Strategy (ODS) [APP-182]** will include a new paragraph following 5.4.11 as follows: "*When safe to do so, samples of the contained firewater runoff will be taken by a suitably competent person and submitted to a UKAS accredited laboratory for analysis using UKAS and MCERTS accredited methods, where applicable. The samples will be analysed to determine the presence and concentration of contaminants and checked against the hazardous substances listed in the 'surface water pollution risk assessment for your environmental permit' guidance (EA and DEFRA, 2016). The contained runoff will not be removed or discharged until the results have been reviewed and the appropriate disposal route is confirmed*. *In the event of contamination, the drainage isolation device will not be reopened until appropriate cleaning of the drainage system has been undertaken."* Section 3.1.7 of the **oBSMP [APP-196]** describes a dry pipe suppression system, this is only designed to discharge water (from a designated water tank separate to the water supply provided for firefighting water for boundary cooling). The Applicant can confirm that this type of suppression system would only discharge water and not utilise any other type of suppression agent.
				Impact:	Risk of contaminants being allowed to enter the water environment if testing regime is inadequate. Testing is important to provide information around the quality of water that has been contained after a fire and will ascertain if it contains any contaminants and what level of risk to the water environment the contained firewater has.	
				Solution:	Details should be provided regarding what testing is proposed in the event of a fire.	
			Additional comments:	For advice, we expect that water samples would be taken, when safe to do so, which would then be sent to a UKAS accredited laboratory for analysis, using UKAS and MCERTS accredited methods (where applicable). The water samples should be checked against the list of hazardous substances in the surface water pollution risk assessment guide: Surface water pollution risk assessment for your environmental permit - GOV.UK. Section 3.1.7 of the outline BSMP describes fire suppression systems. Details of proposed fire suppressant chemicals, if proposed, are to be determined. If fire suppressant systems contain polluting or hazardous chemicals these could potentially		

				impact groundwater quality if discharged to ground. Details of fire suppressant chemicals will need to be provided in the detailed BSMP. Any fire suppressant system selected should preferably pose no harm to human health or the environment. The physicochemical properties of the selected suppressant should be confirmed via supporting documentation such as Material Data Safety Sheets.		
ID	**Theme**	**Issue**	**Comment**			**Applicant's Response**
EA15	Water Resources and Flood Risk	Disposal of Firewater	Appendix 15.4 Outline Drainage Strategy (ODS) [APP-182], Sections 5.4.7 and 5.4.12 Outline Battery Safety Management Plan [APP-196], Sections 4.3.1 and 4.5.8 Appendix 15.2: Water Environment Regulations (Water Framework Directive) Compliance Assessment [APP-180], Section 7.4.29	Issue:	Inconsistency across documents regarding the disposal of firewater. No consideration of this within the WER.	This will be incorporated into **ES Volume 3, Appendix 15.2: Water Environment Regulations (Water Framework Directive) Compliance Assessment [APP-180]** no later than Deadline 1 with specific inclusion of paragraph 5.4.12 of **Appendix 15.4: Outline Drainage Strategy (ODS) [APP-182]**, relating to Environmental Permits. **ES Volume 3, Appendix 15.4: Outline Drainage Strategy (ODS) [APP-182]** paragraphs 5.4.11 – 5.4.12 state *"The retained firewater would be sampled and tested, and disposed of by a licensed tanker off-site where contamination is confirmed, prior to the valve being manually re-opened to resume normal operation.* *As the discharge of contaminated firewater to the environment is not permitted without an Environmental Permit, only water confirmed as uncontaminated and safe for release would be discharged in a controlled manner to the local drainage network. This approach ensures that environmental protection is maintained under both normal and emergency conditions."* Specific details beyond this will be included in the detailed Battery Safety Management Plan. The Applicant acknowledges the timing risks identified by the EA, hence why it is enabling flexibility in how this matter will be dealt with.
				Impact:	Risk of reducing water quality if firewater containing polluted substances is discharged. Discharge of tested firewater into the water environment would require an Environmental Permit, which would require the firewater to be held during the application process. This would significantly reduce the capacity of the drainage system for this period, reducing the resilience of the system and increasing environmental risk.	
				Solution:	Confirm details of firewater disposal. The language used to describe these details should be	

					consistent across all documents. It should be ensured the WER also refers to the proposals for removal of contaminated runoff following a fire event.	
			Additional comments:	Section 4.5.8 of the outline BSMP states that if water is tested and deemed suitable for discharge, it will be released to the local drainage network. However, Section 5.4.7 of the ODS only mentions removal via tanker and treatment off-site. If release to local drainage networks is still an option this must be included in the ODS. The Applicant should note that tankering offsite is our preferred method of disposal. Section 5.4.12 of the ODS acknowledges that discharge of contaminated firewater is not permitted without a permit, and goes on to state that only water that has been confirmed as uncontaminated and safe to be released would be discharged. Discharge into drainage systems, and into the water environment onsite may require a permit. It should be noted that the time taken to issue a Groundwater Activity Permit may be substantial, with decisions on applications usually being made within 4 months. This is likely to result in significant delays to resuming operation of the BESS or Substation facility and carries a significant risk that further rainfall events or a second fire event during the testing and permit application period may result in the drainage system being overwhelmed and a pollution event occurring. Further guidance is available at: Discharges to surface water and groundwater: environmental permits - GOV.UK	

ID	Theme	Issue	Comment			Applicant's Response
EA16	Water Resources and Flood Risk	Post-Incident Recovery Plan	Appendix 15.4 Outline Drainage Strategy (ODS) [APP-182], Section 5.4.13 Outline Battery Safety Management Plan [APP-196], Section 4.4.4 Appendix 15.2: Water Environment Regulations (Water Framework Directive) Compliance Assessment [APP-180], Section 7.4.29	Issue:	There is no commitment in the post-incident recovery plan ort the WER to the cleaning/decontamination of the firewater drainage system prior to valve re-opening.	These matters will be incorporated into an update to **ES Volume 3, Appendix 15.2: Water Environment Regulations (Water Framework Directive) Compliance Assessment [APP-180]** no later than Deadline 1. The **Outline Battery Safety Management Plan (oBSMP) [APP-196]** will also be updated to include the following: "*When safe to do so, samples of the contained firewater runoff will be taken by a suitably competent person and submitted to a UKAS accredited laboratory for analysis using UKAS and MCERTS accredited methods, where applicable. The samples will be analysed to determine the presence and concentration of contaminants and checked against the hazardous substances listed in the 'surface water pollution risk assessment for your environmental permit' guidance (EA and DEFRA, 2016). The contained runoff will not be removed or discharged until the results have been reviewed and the appropriate disposal route is confirmed*. *In the event of contamination, the drainage isolation device will not be reopened until appropriate cleaning of the drainage system has been undertaken*."
				Impact:	Risk of any contaminants that have settled out being re-mobilised in surface water runoff and causing a deterioration in water quality, if the containment area is not cleaned prior to the valve re-opening.	
				Solution:	The outline BSMP should be updated to confirm that the containment area will be thoroughly cleaned prior to any shut-off valves being re-opened to ensure there is no risk of secondary contamination reaching the water environment when valves are re-opened for normal operation. The WER report should also refer to the decontamination and verification processes to be followed before operation of the BESS drainage system is resumed.	
			Additional comments:	We are pleased to note that the Section 5.4.13 of the ODS does not recommend the use of subsurface gravel systems for surface water attenuation and firewater containment due to subsequent issues with management of residual contamination in the gravels following a fire event. Any			

				damage to the containment system should be repaired and tested to ensure the system remains effective.		
ID	**Theme**	**Issue**	**Comment**			**Applicant's Response**
EA17	Battery Safety	Storage and Disposal of Batteries	Outline Operational Environmental Management Plan [APP-193], Sections 2.2.4 and 2.2.9 Outline Battery Safety Management Plan [APP-196], Sections 3.3.16 and 4.4.4	Issue:	Insufficient detail provided regarding the storage and disposal of damaged or end-of-life batteries.	The **Outline Battery Safety Management Plan (oBSMP) [APP-196]** states that "*Once a defective module is safely removed in accordance with the specific risk assessment and manufacturer instructions, if removed from the BESS Enclosure it will be stored in an approved protective container with requisite ingress protection and fire and explosion detection systems, prior to being transported from the BESS Compound to a dedicated safe location for inspection by an authorised manufacturer's representative*". This will ensure the risk of surface runoff is mitigated. Prior to removal from site damaged and end-of-life batteries will be stored within the BESS Compound on Solar Development Site 2. Further details on the removal and disposal of damaged equipment will be added to the **oBSMP [APP-196]**. Specific details on the removal and disposal of damaged equipment will be included within the detailed Battery Safety Management Plan which will be prepared by the appointed Contractor(s), substantially in accordance with the **oBSMP [APP-196]**, and will be submitted for approval by North Yorkshire Council, in consultation with North Yorkshire Fire and Rescue Service and the Environment Agency. The following text will be added to Section 3.3.16 of the **oBSMP [APP-196]** no later than Deadline 1: *"Specific protocols for storage and removal will fully align with the supplier's maintenance, decommissioning, and warranty stipulations. Protocols will ensure that all credible pollution, fire and explosion protection safety risks are fully mitigated."* This will ensure the risk of surface runoff is mitigated. The following will also be added: *"Once a defective module is safely discharged or removed in accordance with the specific risk assessment, it shall be stored in an approved protective container suitable for the safe storage of BESS battery components prior to being transported from the defective unit to a dedicated safe location for inspection by an authorised manufacturer's representative. Storage location and protective container design will be approved at the detailed design stage by NYFRS and the EA, detailed safety protocols will be included in the final BSMP."*
				Impact:	Risk of surface runoff becoming contaminated and decreasing water quality if batteries are not managed appropriately. Batteries can cause chemical pollution and present a fire risk.	
				Solution:	The documents should be updated to confirm where damaged and end-of-life batteries will be stored prior to removal from site. If it is outside of the BESS units, the storage area must be impermeable, covered and bunded, and a fire watch should be implemented.	
			Additional comments:	Sections 2.2.4 and 2.2.9 of the outline OEMP discuss replacing BESS infrastructure, including batteries, but the storage and disposal of damaged or end-of-life batteries is unclear. We note that some information is provided in Section 3.3.16 of the outline BSMP, however further information on the location of the "approved protective container" is required. Whilst some detail regarding the "removal and disposal of damaged equipment" will be developed in a post-incident recovery plan, according to Section 4.4.4 (14) in the outline BSMP, more information is still required at this stage.		

ID	Theme	Issue	Comment			Applicant's Response
EA18	Water Resources and Flood Risk	Construction Methodology	Outline Construction Environmental Management Plan [APP-192], Table 3-13	Issue:	Insufficient detail regarding the 'construction methodology' mitigation measures in Table 3-13.	Table 3-13 within the **Outline Construction Environmental Management Plan (oCEMP) [APP-192]** will be updated no later than Deadline 1 to set out that the detailed CEMP will include details on fuel and oil storage and disposal of water from concrete during construction in line with the guidance information provided.
				Impact:	Risks to water quality in the event of a pollution incident associated with fuel/oil or concrete, if suitable mitigation measures are not included.	
				Solution:	The outline CEMP should be updated to explain how refuelling will be managed (such as only occurring in an impermeable area), if the fuel and oil storage tanks will be bunded and if oil interceptors will be used. Oil storage should be covered to prevent rainwater accumulation.	
			Additional comments:	Further information on storage, including secondary containment, bunding and volumes, is available here: Oil storage regulations for businesses - GOV.UK. Where concrete is proposed to be contained in a lined pit or bunded areas, it should be confirmed how any contained water within these, including any concrete vehicle washout water, will be safely disposed of.		
ID	**Theme**	**Issue**	**Comment**			**Applicant's Response**
EA19	Water Resources and Flood Risk	Spill Mitigation During Operation and Decommissioning	Outline Pollution and Spillage Response Plan [APP-198], Sections 2.1.3, 2.3.4 and 2.3.5 and Plate 1	Issue:	The outline Pollution and Spillage Response Plan (PSRP) suggests full mitigation measures will be included in the CEMP, but there are no references to the OEMP and DEMP.	The **Outline Pollution and Spillage Response Plan (oPSRP) [APP-198]** will be updated no later than Deadline 1 to include reference to the **Outline Operational Environmental Management Plan (oOEMP) [APP-193]**, and **Outline Decommissioning Environmental Management Plan (oDEMP) [APP-194]**, within these sections.
				Impact:	Risk of important mitigation measures during the operation and decommissioning phases being missed if the OEMP and DEMP are not referenced.	
				Solution:	The outline PSRP should be updated to ensure mitigation	

					measures in the OEMP and DEMP are also included, as well as the CEMP.	
			Additional comments:	Plate 1, which shows the Stop, Contain, Notify and Clean-Up procedure, should be updated so that the final flow diagram box references the OEMP and DEMP, in addition to the CEMP, as a pollution incident could occur at any phase of the project. We recognise that construction phase is most likely to require spill kits, but where materials, machinery or vehicles are on-site during operation and decommissioning there could be spills during these that need managing.		
ID	**Theme**	**Issue**	**Comment**			**Applicant's Response**
EA20	Water Resources and Flood Risk	Storage of Substances during Decommissioning	Outline Decommissioning Environmental Management Plan [APP-194], Table 3-12	Issue:	Table 3-12 does not state enough detail regarding storage and containment measures.	Table 3-3 within the **Outline Decommissioning Environmental Management Plan (oDEMP) [APP-194]** will be updated to include all relevant details from the **Outline Construction Environmental Management Plan (oCEMP) [APP-192]** and the typo in Table 3-12 will be corrected.
				Impact:	Risk of a reduction in water quality if fuels, oils and chemicals are not managed suitably, enter surface runoff and reach watercourses.	
				Solution:	Further details on the storage and containment measures should be listed and it should be consistent with the outline CEMP. Management measures should include: • Keeping chemicals, fuels, and oils storage areas covered. • Secondary containment (such as drip trays and bunding) and/or use of double-skinned tanks. Bunded areas should be able to hold 110% of the storage volumes and may require a valve to drain. • Use an oil interceptor	

					• Refuelling is only completed in designated areas of construction compounds, away from sensitive receptors. Further guidance can be found at Pollution prevention for businesses - GOV.UK.	
			Additional comments:	Table 3-12 states that there will be "safe storage of materials, including containment measures, bunding, drop trays". This does not provide enough detail to be confident in the outline DEMP. There is a typo in Table 3-12. "Drop trays" should be "drip trays".		
ID	**Theme**	**Issue**	**Comment**			**Applicant's Response**
EA21	Water Resources and Flood Risk	Mitigation in WER Compliance Assessment	Appendix 15.2: Water Environment Regulations (Water Framework Directive) Compliance Assessment [APP-180], Section 5.2.3 Outline Pollution and Spillage Response Plan [APP-198], Sections 2.1.3	Issue:	Omission of the outline OEMP and outline DEMP from the list of management plans which will contain embedded mitigation.	Section 5.2.3 of **ES Volume 3, Appendix 15.2: Water Environment Regulations (Water Framework Directive) Compliance Assessment [APP-180]** and Section 2.1.3 of the **Outline Pollution and Spillage Response Plan (oPSRP) [APP-198]** will be updated no later than Deadline 1 to include reference to the **Outline Operational Management Plan (oOEMP) [APP-193]** and the **Outline Decommissioning Management Plan (oDEMP) [APP-194]** (and the operational and decommissioning phases more generally).
				Impact:	Absence of mitigation measures during this project which protect the water environment.	
				Solution:	Section 5.2.3 of the WER Compliance Assessment and 2.1.3 of the PSRP should be updated to name the outline	
			Additional comments:	The PSRP should be updated prior to the operational and decommissioning phases in order to ensure that it remains valid.		
ID	**Theme**	**Issue**	**Comment**			**Applicant's Response**
EA22	Water Resources and Flood Risk	Commitments Register	Appendix 1.3 Commitments Register [APP-145], Table 1-1 Outline Operational Environmental Management Plan [APP-193], Table 3-13	Issue:	There are several commitments in the commitments register which do not contain sufficient detail to provide confidence in it as a mitigation measure. There are also no commitments with respect to Per- and	In the first instance, it is noted that **ES Volume 3, Appendix 1.3: Commitments Register [APP-145]** deliberately does not set out the full detail of every mitigation measure committed to, as it would mean that the Register would become a repeat of all the management plans put together. The relevant detail for

			Appendix 15.4 Outline Drainage Strategy (ODS) [APP-182], Sections 5.2.2 and 5.5.13 Chapter 15: Water Resources and Flood Risk [APP-053], Section 15.8.7 Outline Construction Environmental Management Plan [APP-192], Table 3-13		polyfluoroalkyl substances (PFAS) or concrete water disposal.	many of the EA's comments is therefore either included, or is a matter for the Management Plans themselves No Per- and polyfluoroalkyl substances (PFAS) are to be used in solar panel coatings and on BESS batteries, as outlined within the **Outline Operational Management Plan (oOEMP) [APP-193]**. A commitment will be added to **Appendix 1.3: Commitments Register [APP-145]** to reflect this. In regard to PFAS within cabling, the Applicant can confirm that the underground cables will utilise standard cross-linked polyethylene (XLPE) insulation. XLPE is typically not a fluorinated polymer, unlike materials such as PTFE or FEP, and pure XLPE insulation therefore does not inherently contain PFAS. However, it remains the case that ancillary components or certain manufacturing steps associated with cable production may involve PFAS. These could include tapes, lubricants, semi-conductive layers, or external jackets where PFAS-free alternatives are not universally available. While the Applicant will avoid the use of PFAS in ancillary components where a technically feasible and reasonable alternative exists, it is not possible to guarantee that all cabling materials and associated components will be entirely PFAS-free across the Proposed Development. This is not unique to the Proposed Development and is typical of any project that involves the use of similar cabling materials. At the point of decommissioning, the Applicant will undertake an assessment to determine the most appropriate approach, balancing the environmental effects of cable removal against those associated with retention in situ. This assessment will take account of contemporary government policy, emerging PFAS related guidance, advances in decommissioning technology, and site specific environmental considerations. The final approach will be secured through the detailed Decommissioning Environmental Management Plan (DEMP), which will be prepared and agreed with the relevant local authority prior to the commencement of decommissioning. **ES Volume 3, Appendix 1.3: Commitments Register [APP-145]** and all relevant management plans will be updated no later than Deadline 1 to account, where appropriate, for the EA's comments and the Applicant will discuss the details further with the EA.
				Impact:	Risk of reducing water quality.	
				Solution:	We would suggest that the following existing commitments are updated with the following details: • C30: Include Chapter 15 Water Resources and Flood Risk in ES Document section. • C32: This could include the types of SuDS that will be used, and a commitment to a SuDS maintenance schedule. Decommissioning should also be listed in the Project phase. • C34: This commitment currently includes offsets from oil/fuel storage infrastructure, but details such as covering of these storage areas, Secondary containment (such as drip trays and bunding), use of double-skinned tanks, use of oil separators etc. are not included. This should be its own commitment. Further guidance can be found at Pollution prevention for businesses - GOV.UK	

					and Storing oil at your home or business: Overview - GOV.UK. C34 should also have the outline OEMP and outline DEMP listed as securing mechanisms. C39: The Register states that infiltration systems or storage tanks should be emptied and inspected to ensure they do not pose any residual flood or pollution risks. This Commitment should clearly state that this should be implemented on a regular schedule and in response to any pollution events. C112: Chapter 15 states that a Foundation Works Risk Assessment (FWRA) will be produced for foundation and piling works, however this commitment only covers piling activities. Non-piled foundations may also pose a risk to groundwater quality, and this should be reflected within this commitment which should be revised to also cover deep foundations where the creation of contaminant pathways could occur. C118: This commitment should make it clear that "collection for non-potable use" is the preferred disposal method for surface water runoff, before the hierarchy of disposal via infiltration is used (as per Section 5.2.2 of the ODS). • C127: This commitment should confirm the method of foul water disposal. Section 5.5.13 of the ODS refers to a septic tank which are not	

					always sealed and may require a permit: Septic tanks and sewage treatment plants: what you need to do: Overview - GOV.UK. C131: This commitment is relevant to the construction and decommissioning phases, in addition to the operation phase, as there is a risk whilst batteries are on site. Substation drainage management is missing from this commitment and key elements including (but not limited to) automatic penstock valve operation should be referenced. The ODS could also be listed as a securing mechanism. C139: this item does not indicate that geoenvironmental investigation will be carried out as is stated within the outline CEMP. Without this included potential sources of contamination may not be investigated and pollution of controlled waters could occur. It should be reworded to refer to representative geoenvironmental testing and subsequent risk assessment, to address potential sources of contamination where these are identified. We would suggest that the following additional commitments are added into the Commitments Register: A PFAS commitment. Table 3-13 of the outline CEMP said that "Cables are to be PFAS free where possible, and fluid-filled cables will not be used" but this is not listed in the Commitments Register.	

					A commitment that minimises the impact of concrete on water quality. Table 3-13 of the outline CEMP includes containment measures for when using concrete on site, but this detail is not covered in the Commitments Register. Further details on the safe disposal of concrete washout water should also be provided.	
			Additional comments:	The materials and coating use on some solar PV panels can contain PFAS. PFAS are 'forever chemicals' that will negatively affect water quality. Risk from PFAS can be increased during washing to keep them clean, for maximum efficiency of energy generation. We would recommend that the Applicant checks with the panel manufacturers to check if the materials used contain PFAS.		
ID	**Theme**	**Issue**	**Comment**			**Applicant's Response**
EA23	Water Resources and Flood Risk	Drainage during Decommissioning	Chapter 15: Water Resources and Flood Risk [APP-053], Section 15.8.7 Appendix 15.4 Outline Drainage Strategy (ODS) [APP-182], Section 5.1.2	Issue:	Sections 5.1.2 of the ODS and Section 15.8.7 of Chapter 15 suggests that surface water will be managed during the operational phases, and temporarily during construction via the ODS. However, it is unclear how drainage will be managed during decommissioning.	The only point not currently included in one of the management plans is the acquisition of a Water Discharge Activity Permit if necessary in the **Outline Construction Environmental Management Plan (oCEMP) [APP-192]** and **Outline Operational Environmental Management Plan (oOEMP) [APP-193]**. This will be made explicit in the **oCEMP [APP-192]** and **oOEMP [APP-193]**. Surface water drainage is covered within the **Outline Decommissioning Environmental Management Plan (oDEMP) [APP-194]** in Table 3-13 where it states "*Surface water systems would be decommissioned with due regard to water quality management and the prevention of uncontrolled runoff. The decommissioning process would typically involve dewatering, disconnecting, and sealing any drainage outfalls to prevent uncontrolled discharges; removing silt or debris from any drainage features including SuDS; and ensuring no residual contaminants remain that could pose a risk to surface or ground waters.*"
				Impact:	Risk of reducing water quality during the decommissioning phase, if drainage is not managed appropriately.	
				Solution:	Further details should be provided, either in the ODS or in the outline DEMP, regarding how surface water drainage will be managed during decommissioning.	
			Additional comments:	Managing surface water drainage during the decommissioning phase is likely to be similar to management during the construction phase.		

				We also wish to flag to the Applicant that Section 15.8.7 of Chapter 15 is unclear. Part (1) suggests the outline CEMP will cover (b) Surface water and groundwater management measures; (c) Water Management Plan; (d) Rainfall runoff management; and (e) Appropriate drainage design. The difference between these four listed measures is unclear, and it also appears to overlap with Part (2) and Part (3c) for the ODS. Part (1) is the only one to include (h) Effluent management. It is not clear why this is not included for the outline OEMP and outline DEMP. Part (4) the outline DEMP is the only management plan to include (b) Safe storage of materials and (c) Acquisition of a Water Discharge Activity Permit. It is not clear why these are not included for the outline CEMP and outline OEMP. Having measures that are repeated and similar, but not explained, can be confusing to the reader about what the management plans will include. Section 15.8.7 could be revised and simplified, to make it clearer what the purpose of the management documents are and what measure are expected to be included.	
ID	**Theme**	**Issue**	**Comment**			**Applicant's Response**
EA24	Water Resources and Flood Risk	Water Quality Monitoring	Chapter 15: Water Resources and Flood Risk [APP-053], Section 15.12.1 Outline Construction Environmental Management Plan [APP-192], Tables 3-3 and 3-13 Outline Operational Environmental Management Plan [APP-193], Tables 3-8 and 3-13 Outline Decommissioning Environmental Management Plan [APP-194], Table 3-12	Issue:	The frequency and location of water quality monitoring is unclear.	The **Outline Pollution and Spillage Response Plan (oPSRP) [APP-198]**, **Outline Construction Environmental Management Plan (oCEMP) [APP-192], Outline Operational Environmental Management Plan (oOEMP) [APP-193]**, and **Outline Decommissioning Environmental Management Plan (oDEMP) [APP-194]** no later than Deadline 1, will be updated to include a commitment for a monitoring plan to be developed which will outline the frequency of water quality monitoring prior to and during construction, the first few months of operation, and decommissioning, as relevant. Monitoring locations are not defined at this stage; however, the **Outline Pollution and Spillage Response Plan (oPSRP)**

			Outline Pollution and Spillage Response Plan [APP-198], Sections 3.1.1 and 3.3.3			**[APP-198]** will be updated no later than Deadline 1 to describe the process for identifying the monitoring locations. A summary of which is: 1. use the construction plan to identify locations of higher-risk construction activities e.g. compounds, concrete works, fuel storage, washout areas etc. 2. Use the existing identified receptors from the baseline to identify any receptors at risk from these activities, if present. 3. Sense check against anticipated drainage pathways and/or discharge points associated with temporary construction drainage to confirm potential pollution pathway exists. 4. Identify downstream/ downgradient monitoring locations based on pathway between source and receptor. 5. Set duration and frequency of monitoring based on construction programme, including baseline monitoring prior to construction commencing. The Applicant has sought to avoid where possible repetition within the Management plans, and so measures do not need to be repeated across tables – the monitoring is secured via Table 3-3. Furthermore, detail that is in the **oPSRP [APP-198]** does not need to be added into the Outline CEMP/OEMP/DEMP, as those plans already explain how they relate to the oPSRP and so should be considered together.
				Impact:	If a water quality monitoring plan is not suitably designed it may not be able to capture a suitable baseline or detect relevant trends in water quality deterioration or improvement during the phases of the Proposed Development.	
				Solution:	There should be a commitment for a monitoring plan to be further written which details frequency and location, this should then be agreed as part of the CEMP, OEMP and DEMP. Section 15.12.1 should be updated to include additional details on monitoring, and we recommend it is updated to be consistent with the management plans. Water quality monitoring should be conducted by the Applicant pre-construction, during construction and for the first few months of operation. Monitoring in early operation should be done with in-situ monitoring and water quality sampling, not just walkovers. Water quality should then resume during decommissioning to ensure that water quality returns to a pre-construction baseline.	
			Additional comments:	Table 3-8 of the outline OEMP states monitoring requirements will be confirmed in the detailed OEMP, and Table 3-12 of the outline DEMP currently states that water quality monitoring measures will be consistent with those in the outline CEMP. However, the locations, frequency and method of monitoring for water quality is unknown and further details		

				are required in both the outline CEMP, outline OEMP and outline DEMP. Monitoring locations are not well explained in Section 3.1.1 of the outline PSRP and should be detailed further. Monitoring locations should include upstream and downstream of any surface water outfalls or watercourse crossings. Monitoring frequency should begin prior to construction, ideally six months before construction starts to ensure an accurate baseline. In general, frequency of monitoring should be once per month, however during certain construction activities (like earthworks or concrete work) this frequency of sampling may increase. The current plan for ceasing in-situ monitoring and sampling following construction and replacing this with visual checks, as explained in Section 3.3.3 of the outline PSRP, could result in limited confidence that all mitigation measures are acting as expected and ensure there is no risk to water quality from the project. Monitoring should continue all throughout construction, and into the first few months of operation. Monitoring should then resume during decommissioning. We welcome the committed for variety of methods including site walkovers for visual assessment, use of hand-held devices in-situ and samples sent to United Kingdom Accreditation Service (UKAS) accredited laboratories. This level of detail should be contained within the outline CEMP, outline OEMP and outline DEMP. Table 3.3 of the outline CEMP and Table 3-13 of outline OEMP state "regular water quality monitoring is recommended in order to efficiently detect potential accidental	

				pollution events". This should be added to Table 3-13 of the outline CEMP.		
ID	**Theme**	**Issue**	**Comment**			**Applicant's Response**
EA25	Water Resources and Flood Risk	Pollution Policy and Guidance	Outline Construction Environmental Management Plan [APP-192], Section 2.13.1 & 3.1.22 Appendix 15.4 Outline Drainage Strategy (ODS) [APP-182], Section 2.1.3	Issue:	There are errors and omissions within the guidance and policy identified within the outline CEMP and ODS.	Sections 2.13.1 & 3.1.22 of the **Outline Construction Environmental Management Plan (oCEMP) [APP-192]** and Section 2.1.3 of **ES Volume 3, Appendix 15.4: Outline Drainage Strategy (ODS) [APP-182]** will be updated no later than Deadline 1 to reflect these matters.
				Impact:	Using out of date guidance or not considering relevant policy poses compliance risks to the proposals.	
				Solution:	The drainage strategy should be updated to include reference to pollution control aspects of the cited NPS documents. Sections 4.12.14, 5.16.2, 5.16.6 and 5.16.10 of NPS-1 set out expectations regarding pollution control and management. References within the CEMP 3.1.22 to the UK NFCC 'Grid Scale Battery Energy Storage System Planning – Guidance for FRS (2023 and 2024 Draft Revision) should be amended to reflect current guidance. Whilst it is acknowledged that useful information may be contained in the PPGs, they have been withdrawn from use. The Applicant could refer to Pollution prevention for businesses - GOV.UK and Section 2.13.1 updated to make it clear that it is understood that the PPG are withdrawn.	
			Additional comments:			

ID	Theme	Issue	Comment			Applicant's Response
EA26	Water Resources and Flood Risk	Degradation of Cables	Chapter 2: The Proposed Development [APP-040], Section 2.8.32	Issue:	It is anticipated that cabling would not be replaced during the operational phase.	Cabling will be designed to safely operate for the duration of the operational period of the Proposed Development.
				Impact:	There is a risk that should cabling degrade during the lifetime of the development it would release pollutants into the water environment	
				Solution:	It should be confirmed that the design lifespan of underground cabling is commensurate with the Operational phase of the Proposed Development.	
			Additional comments:			
ID	**Theme**	**Issue**	**Comment**			**Applicant's Response**
EA27	Water Resources and Flood Risk	Impact on Groundwater Abstractions	Chapter 15: Water Resources and Flood Risk [APP-053],Table 15-9	Issue:	Table 15-9 (Assessment of Importance) does not directly include groundwater abstractions as a receptor to impacts.	Very High value receptors (licensed groundwater abstractions for public water supply) are covered within the public water supply in the surface water section of Table 15-9 and has been assessed as such. No proposed change to High and Medium value receptors defined in Table 15-9.
				Impact:	The potential severity of impacts of the Proposed Development on licensed and unlicensed abstractions is currently unacknowledged.	
				Solution:	Table 15-9 should be updated to include example impacts on groundwater abstractions.	
			Additional comments:	We recognise that the examples provided in Table 15-9 are not intended to be exhaustive, but we consider that impacts to groundwater abstractions should be afforded similar importance to the other examples listed. Local abstractions should be considered to be high priority receptors, including key Public Water Supply abstractions around Brayton and abstractions more generally across Selby.		

ID	Theme	Issue	Comment			Applicant's Response
EA28	Water Resources and Flood Risk	BESS and Substation Interaction with Water Table	Chapter 15: Water Resources and Flood Risk [APP-053], Sections 15.2.4, 15.5.13, 15.7.30 and 15.9.45 Appendix 15.2: Water Environment Regulations (Water Framework Directive) Compliance Assessment [APP-180], Section 7.3.1 Item 8	Issue:	It is stated that foundation construction at the BESS and Substation sites is not anticipated to encounter groundwater, however our review of available data indicates this may not be the case.	Environment Agency groundwater level monitoring data has been reviewed. The text in **ES Volume 1, Chapter 15: Water Resources and Flood Risk [APP-053]** in Section 15.7.30 has been simplified and generalised for the whole area, omitting areas where groundwater level is closer to ground level than 5 mbgl. It is agreed that in some locations the maximum groundwater level from the monitoring sites are in the range 0.25 mbgl to 3.2 mbgl. However, this does not change the conclusions of the ES, on the basis that any construction dewatering would be undertaken in line with relevant abstraction and discharge regulations. Substations and BESS in Solar Development Sites 1 and 2 are excavating into unproductive superficial deposits and unlikely to reach bedrock. Substation in Solar Development Site 4 is in Breighton Sand Formation (Secondary B) which is likely to be in hydraulic continuity with Sherwood Sandstone Principal Aquifer. There is therefore potential for shallow groundwater to be encountered by foundation excavations and therefore for dewatering to be required, however GI would confirm this. The assessment acknowledges that site specific ground investigation, including groundwater levels, needs to be undertaken for the BESS and substation sites in order to establish whether construction dewatering will be required. The Applicant's conclusions on significance of effect are based on the control measures on abstraction and discharge included within Table 3-13 of the **Outline Construction Environmental Management Plan (oCEMP) [APP-192]**. This includes requirements for ground investigation to be undertaken to inform the detailed design and for any groundwater control operations to be non-consumptive and undertaken in line with regulatory requirements. The **oCEMP [APP-192]** will be updated no later than Deadline 1 to also provide that the detailed CEMP must provide for a proportionate assessment of impacts of dewatering once site-specific groundwater levels are established through GI.
				Impact:	If shallow groundwater is encountered, this is likely to require dewatering. Dewatering activities associated with shallow foundation construction and the construction of launch and reception pits for trenchless crossings could impact sensitive groundwater receptors including aquifers, abstractions, surface water bodies and Groundwater Dependent Terrestrial Ecosystems (GWDTEs) if suitable mitigation is not in place.	
				Solution:	Review the available data to ensure the conceptual groundwater model for the BESS and Substation sites is accurate and provide clarification on the groundwater implications of construction dewatering.	
			Additional comments:	Section 15.7.30 states there are five Environment Agency groundwater level monitoring stations and no groundwater quality monitoring stations within the Study Area. The report states that the monitoring stations show seasonal fluctuation, and groundwater levels typically fluctuating between 7 and -4 m Above Ordnance Datum (m AOD), equivalent to approximately 5 to 15m below ground level (mbgl).			

				We have carried out a brief review of the monitoring stations identified in Figure 15.4 on the Environment Agency's Hydrology Data Explorer (Hydrology Data Explorer – Explore) which shows the minimum depth to groundwater ranging locally from approximately 0.25 m to 3.2 m below the reference datum over the available monitoring data. Several locations show groundwater elevations within likely foundation depth, though we recognise that several of these may be associated with sub- artesian bedrock aquifers overlain by low permeability superficial deposits and these groundwater units may not be encountered by shallow earthworks. It is acknowledged it is proposed to revisit the need for construction dewatering following post-consent ground investigation, as stated in Section 15.2.4, and that the need for a Hydrogeological Impact Assessment will subsequently be revisited. Dewatering activities associated with shallow foundation construction and the construction of launch and reception pits for trenchless crossings could impact sensitive groundwater receptors including abstractions, surface water bodies and GWDTEs. This is a particular concern for CRC1-4 near Hambleton, Thorpe Willoughby and Gateforth, where BGS mapping indicates the Proposed Development is directly underlain by bedrock Principal aquifer with no superficial cover. The crossing schedule shows several crossings in this area, including at least one trenchless watercourse crossing. Section 15.9.49 concludes that impact significance on groundwater quantity from the construction phase of the Proposed Development will be negligible or neutral (not significant) based on embedded mitigation and good practice water	

				management measures implemented as outlined in the CEMP. It should be made clear whether this is based on the presumption that dewatering requirements at the BESS and Substation developments will be minimal or based on a reasonable worst case position of the presence of shallow groundwater at these locations.		
ID	**Theme**	**Issue**	**Comment**			**Applicant's Response**
EA29	Water Resources and Flood Risk	Retaining Access to Monitoring and Sampling Points	Chapter 15: Water	Issue:	The report states that there are no river flow or level gauging stations within the Order Limits or Study Area, and that five hydrometric monitoring stations are present within the Study Area. Our records show there are several surface water and groundwater monitoring and sampling points within the Proposed Development footprint.	The Environment Agency Hydrology Data Explorer has been reviewed and the statements made in **ES Volume 1, Chapter 15: Water Resources and Flood Risk [APP-053]** are still correct. There are no open river flow or level gauging stations within the draft Order Limits or Study Area as stated in the ES, unless the EA have locations which are not visible on Hydrology Data Explorer. There are five hydrometric monitoring stations within the study area, and all are for groundwater level monitoring. Sites on Water quality data explorer have not been discussed as these are not continuous monitoring locations and therefore not permanent.
				Impact:	The construction and operation of the Proposed Development may impact access to, and the operability of, these monitoring points.	
				Solution:	The Applicant should liaise with the Environment Agency to ensure the development proposals do not compromise the existing monitoring network.	
			Additional comments:	Our records show the presence of water sampling and hydrometric monitoring works within some of the Solar Development Sites and Cable Route Corridors.		

ID	Theme	Issue	Comment			Applicant's Response
EA30	Water Resources and Flood Risk	Retention of Cables Post-Decommissioning	Chapter 2: The Proposed Development [APP-040], Sections 2.9.6 and 2.9.8 Chapter 15: Water Resources and Flood Risk [APP-053], Sections 15.9.1 and 15.9.144 Appendix 1.3 Commitments Register [APP-145]	Issue:	Decommissioning proposals include leaving most ground infrastructure below 1.2 mbgl in situ within Solar Development Sites.	Flexibility has been intentionally maintained regarding the approach to cable decommissioning. Current industry good practice indicates that the most environmentally acceptable option is typically to leave cables in situ at the end of their operational life, as this avoids unnecessary soil disturbance and associated impacts. However, the final approach will remain subject to prevailing government policy, regulatory guidance, and best practice at the time of decommissioning. Should removal of the cables and associated ducting be deemed the most appropriate option at that time, this remains feasible. A commitment to undertake an analysis of the most appropriate action is already secured in the **Outline Decommissioning Environmental Management Plan (oDEMP) [APP-194]** at paragraph 2.1.6, and refers to cables outside of the solar sites (Interconnecting Cabling and Grid Connection Cabling). Matters such as the latest position on PFAS management are covered by the reference to taking account of best practice and regulatory guidance. The **Outline Construction Environmental Management Plan (oCEMP) [APP-192]** will be updated no later than Deadline 1 to make the requested commitment in respect of cable construction.
				Impact:	Cables left in situ may represent an unacceptable risk of pollution of controlled waters via degradation. Prevailing guidance at the time of decommissioning may indicate that removal of cables is the most environmentally suitable option.	
				Solution:	The Applicant should commit to carrying out an assessment of the impacts of removal vs in situ retention of buried cabling prior to the decommissioning phase in accordance with then-current guidance, with this used to inform the detailed DEMP. This should be captured in the Commitments Register.	
			Additional comments:	Determination of the fate of buried cables prior to the decommissioning phase is proposed for the Interconnecting Cables and Grid Connection Cables in Chapter 2 Section 2.9.8. Section 2.9.6, referring to Solar Development Site buried cables, currently does not commit to a similar review process. Section 15.9.1 states that "whilst the most environmentally acceptable method is to leave the cables in-situ, the cables may be			

				removed by opening up the ground at regular intervals and pulling the cable through to the extraction point." We encourage the Applicant where practicable to select a means of cable construction which best enables the removal of underground cabling, should this ultimately be the preferred environmental option at the time of decommissioning.		
ID	**Theme**	**Issue**	**Comment**			**Applicant's Response**
EA31	Water Resources and Flood Risk	Peat Deposits	Chapter 15: Water Resources and Flood Risk [APP-053], Section 15.7.24	Issue:	The Cable Route Corridor extends through localized mapped deposits of peat.	Noting that geology and ground conditions were scoped out of the ES assessment, damage to peat deposits and ground instability are considerations for the geotechnical design at detailed design stage. Ground investigation will be designed to target peat deposits along the cable route and findings incorporated into the geotechnical design of the trenches. Any required mitigation measures will be incorporated into the final Construction Environmental Management Plan as appropriate, which the EA will be consulted on.
				Impact:	Unmitigated damage to peat deposits during the construction phase could result in the release of contaminants which may affect water quality.	
				Solution:	Accurately identify and assess peat deposits and include mitigation measures to minimise or prevent damage to peat deposits within the outline CEMP.	
			Additional comments:	The presence of peat may also pose ground stability hazards to aspects of the Proposed Development. Peat does not have aquifer properties but if permitted to become damaged, can release pollutants which may impact surface and/or groundwater quality. Where high voltage cables would be buried in peat deposits, possible deleterious impacts from heat emissions should also be taken into consideration.		

ID	Theme	Issue	Comment			Applicant's Response
EA32	Water Resources and Flood Risk	Thermal Pollution of Groundwater	Chapter 15: Water Resources and Flood Risk [APP-053] Appendix 15.2: Water Environment Regulations (Water Framework Directive) Compliance Assessment [APP-180]	Issue:	Thermal effects of buried cables have not been considered.	Thermal effects of buried cables has not been included in the assessment as this is an emerging issue which had not been identified, and has not been brought up within the pre-application stages for this project. The approach to this matter will be discussed and agreed with the Environment Agency.
				Impact:	Risk of thermal pollution of sensitive groundwater and groundwater-linked receptors during the operational phase, if thermal effects of buried cables are not assessed.	
				Solution:	Assess thermal impacts from buried cables during the operational phase and provide mitigation where necessary.	
			Additional comments:	Underground electrical cables generate heat that dissipates naturally to the surrounding ground during power transmission. The levels of heat loss and dissipation will be dependent on numerous factors including cable design, soil structure, transmission voltage and engineering design. Where underground cables interact with groundwater bodies this could result in local degradation of groundwater quality and negatively impact nearby abstractions via the generation of a heat plume. Heat as a groundwater pollutant was introduced in 2023 via the Environmental Permitting (England and Wales) (Amendment) (England) Regulations 2023. We are mindful that work is being carried out in this area in relation to heating of groundwater from ground source heating and cooling systems, but there is currently no guidance relating to the potential thermal implications of high voltage buried electricity cables. The Environment Agency's Chief Scientist's Group has published a report for Ground Source Heating and Cooling		

				(GSHC) systems (Environmental Impacts of Temperature Changes from Ground Source Heating and Cooling Systems). In this study, a 'thermal plume' was defined as the region around a GSHC system that experiences a 1 degree C temperature change or greater. While the study is not directly applicable to thermal emission from underground cables, an equivalent benchmark could be considered when assessing heat pollution from underground HV cables. The Chief Scientist's Group states that the environmental factors with the greatest influence on thermal plume development include groundwater flow and bulk thermal conductivity. It identifies that impacts may occur by direct (temperature change) and indirect (e.g. changes in water chemistry) means. At this stage we are asking Applicants to consider the potential thermal implications of buried cables, in relation to risks to groundwater, via desk-based assessment. We recognise that as this an emerging issue, this matter has not been raised previously within the pre-application stages for this project.	
ID	**Theme**	**Issue**	**Comment**			**Applicant's Response**
EA33	Water Resources and Flood Risk	WER Waterbodies within the Study Area	Chapter 15: Water Resources and Flood Risk [APP-053], Table 15-7 Appendix 15.2: Water Environment Regulations (Water Framework Directive) Compliance Assessment [APP-180], Table 6-1	Issue:	The table lists all WER waterbodies within the Order Limits but does not include WER water bodies within the Study Area.	The following WER water bodies will be added to Table 6-1 of **ES Volume 3, Appendix 15.2: Water Environment Regulations (Water Framework Directive) Compliance Assessment [APP-180]** and shall be screened out for further assessment as no direct or in-direct impacts are expected: • Groundwater – Derwent Sherwood Sandstone • Surface water – River Derwent from Elvington Beck to River Ouse
				Impact:	Impacts could occur from the Proposed Development to WER waterbodies not immediately within the Order Limits area.	

				Solution:	The Applicant should consider all WER waterbodies within the Study Area.	
			Additional comments:	The Derwent Sherwood Sandstone WER Groundwater body (ref. GB40401G700600) is located within 1km of CRC1-4. We recognise that it is unlikely that this WER Groundwater body would be significantly impacted by the Proposed Development, however the Applicant should ensure that this is considered.		
ID	**Theme**	**Issue**	**Comment**			**Applicant's Response**
EA34	Water Resources and Flood Risk	Dewatering and GWDTEs	Chapter 15: Water Resources and Flood Risk [APP-053], Section 15.8.7	Issue:	Part 1(k) lists measures incorporated into the management plans for the Proposed Development, requiring surface water and groundwater monitoring plans for abstractions and other receptor immediately adjacent to Construction Compounds, trenchless solutions such as HDD or sites where excavations and/or construction dewatering are required.	It is noted that that would be non-consumptive as set out in point 27 under paragraph 15.8.2. Trenchless crossing techniques will be used for watercourses feeding Burr Closes, these will therefore not require dewatering.
				Impact:	Dewatering activities could also impact GWDTEs.	
				Solution:	GWDTEs should be clearly included as examples of sensitive receptors.	
			Additional comments:	Burr Closes Site of Special Scientific Interest (SSSI), a WDTE, is located within 70m of Cable Route Corridor 1-4. The Applicant should demonstrate that should dewatering be required in close proximity to the SSSI that this would result in negligible impacts on the SSSI. We note that as stated in Chapter 15 Table 15-6, HDD is proposed to be used for ditch crossings linked to the SSSI to avoid direct disturbance to watercourses linked to the SSSI. Appendix 15.4 5.7.4 proposes to use HDD at drainage ditch crossings to minimise impacts to connected Burr Closes SSS		

ID	Theme	Issue	Comment			Applicant's Response
EA35	Water Resources and Flood Risk	BESS and Substation Interaction with Bedrock	Chapter 15: Water Resources and Flood Risk [APP-053], Sections 15.9.1, 15.9.45 and 15.9.117	Issue:	The report states that 'excavation of foundations are not expected to reach into the top of bedrock as the worst-case assumption is for 2.5m foundations for the BESS and substations and the locations of these features have been chosen to ensure this will not impact.	The assessment acknowledges that site specific ground investigation is required for detailed design of BESS and substation to ensure that appropriate drainage design and aquifer protection measures are incorporated – see point 26 under Section 15.8.2 within **ES Volume 1, Chapter 15: Water Resources and Flood Risk [APP-053]**. The **Outline Construction Environmental Management Plan (oCEMP) [APP-192]** will be updated no later than Deadline 1 to include that the FWRA will be required for the wider scope of works requested.
				Impact:	Potential for bedrock to be encountered at shallower depth than anticipated at these locations, resulting in increased potential for contaminative impact and/or creation of new flow pathways.	
				Solution:	The Applicant should reassess the likelihood of encountering bedrock at the proposed BESS and Substation locations following confirmation of ground conditions via intrusive investigation.	
			Additional comments:	We note that Section 15.8.7 commits to the production of Foundation Works Risk Assessment for any required foundations or piling activities, secured by the outline CEMP. This should apply to any foundation solution likely to interact with, or else create a new pollution pathway to, a Secondary or Principal aquifer. This should be consistently referenced throughout the submissions. This contradicts a statement made in Table 15-6 which only refers to FWRA being produced for piling works.		

ID	Theme	Issue	Comment			Applicant's Response
EA36	Water Resources and Flood Risk	Omission of Groundwater Units	Appendix 15.2: Water Environment Regulations (Water Framework Directive) Compliance Assessment [APP-180], Sections 4.3.3	Issue:	Several superficial and bedrock units have been missed.	**ES Volume 3, Appendix 15.2: Water Environment Regulations (Water Framework Directive) Compliance Assessment [APP-180]** considers Environment Agency Water Framework Directive water bodies. The Geology section of the report provides a general overview of the baseline geology in the area and is not used as part of a geological conceptual model, therefore this is an additional level of detail deemed not to be required within this report. The geology is considered in full within the baseline section of **ES Volume 1, Chapter 15: Water Resources and Flood Risk [APP-053]**.
				Impact:	The geological conceptual model lacks potentially important detail therefore may be inaccurate.	
				Solution:	Ensure that all mapped geological strata are identified.	
			Additional comments:	Reference to British Geological Survey (BGS) online 1:50,000 scale mapping shows that some superficial deposits present on the site have been missed: Solar Development Site (SDS) 1: Thorganby Clay Member – Clay, Silty. Skipwith Sand Member – Sand, Clayey, Gravelly is listed twice. SDS2: Breighton Sand Formation – Clay, Silty, Alluvium – Clay, Silt, Sand, Gravel SDS6: Alluvium – Clay, Silt, Sand, Gravel, Peat Cable Route Corridor – Harrogate Till Formation – Clay, Sandy, Gravelly, Lacustrine Beach Deposits – Sand and Gravel, Peat, Park Farm Clay Member – Clay, Silty The following bedrock units have also not been identified: SDS2: Roxby Formation – Mudstone SDS6: Brotherton Formation – Dolomitic Limestone SDS7: Brotherton Formation – Dolomitic Limestone and Roxby Formation – Mudstone		

ID	Theme	Issue	Comment			Applicant's Response
EA37	Agricultural Land and Soils	Historic Worked Ground	Chapter 16: Other Environmental Matters [APP-054], Sections 15.9.1, 15.9.45 and 15.9.117 Appendix 16.3 Ground Conditions Preliminary Risk Assessment [AS- 054], Section 16.7.14	Issue:	The GroundSure reports indicate the presence of localised areas of historic worked ground.	The **Outline Construction Environmental Management Plan (oCEMP) [APP-192]** and **ES Volume 3, Appendix 1.3: Commitments Register [APP-145]**. will be updated to commit to avoidance or investigation and remediation where necessary of any areas of historic ground working. Tables 3-13 and 3-14 of the **oCEMP [APP-192]** will be updated no later than Deadline 1 to include reference to the LCRM and updated standard BS10175:2026 when discussing ground investigations. Table 3-14 of the **oCEMP [APP-192]** already provides for sharing of risks assessments to be shared with the EA.
				Impact:	Infilled historic ground workings could contain infill materials with elevated concentrations of contaminants which could impact groundwater quality if disturbed by construction.	
				Solution:	The Applicant should commit to avoidance or investigation and remediation where necessary of any areas of historic ground working.	
			Additional comments:	Chapter 16 states that ground investigations will be carried out in accordance with BS10174:2011+A2:2017. This standard has recently been superseded by BS10175:2026 BS 10175:2026 - TC | 28 Jan 2026 | BSI Knowledge. Contamination site characterisation and risk assessment should be carried out in accordance with the Environment Agency's Land Contamination Risk Management guidance. When available, the proposed scope of investigation should be made available for review and comment. This should include targeted investigation of potentially contaminative features identified in the Preliminary Risk Assessment (PRA).		

				This Section should be updated, with the changes reflected in the outline CEMP and commitments as appropriate. The PRA has applied a 250m search buffer for the identification of environmental constraints including sensitive water receptors. We would not recommend adopting this approach for Ground Conditions Preliminary Risk Assessments, as impacts to controlled waters may extend over significantly greater distances. However, as Chapter 15 has adopted a 1km search buffer for the assessment of impacts to the water environment we do not consider this to affect the ES.		
ID	**Theme**	**Issue**	**Comment**			**Applicant's Response**
EA38	Water Resources and Flood Risk	Infiltration into the Cable Trench	Outline Construction Environmental Management Plan [APP-192], Table 3-13 Appendix 1.3 Commitments Register [APP-145], Table 1-1 Item 132	Issue:	The Table states that clay stanks or alternative impermeable material will be included at regular intervals along the length of the cable trench when passing close to Burr Closes SSSI to minimise the risk of the cable acting as a preferential flow path. There is no mitigation provided however to prevent infiltration into the cable trench.	This impact is looking at the impact of the trench on groundwater flow pathways (quantity) close to the SSSI rather than groundwater quality. Measures to prevent impacts on groundwater quality are dealt with in subsequent bullet points in the same table to prevent leakage or accidental spillage of construction materials and potential pollutants used on-site, infiltrating to groundwater. Assessment of existing contamination (Under a geology and ground conditions chapter) were scoped out of the ES assessment at scoping stage. The reference to pipeline will be removed and replaced no later than Deadline 1 with cable in Table 3-13 within the **Outline Construction Environmental Management Plan (oCEMP) [APP-192]** and Item 132 in Table 1-1 within the **ES Volume 3, Appendix 1.3: Commitments Register [APP-145]**.
				Impact:	Allowing infiltration into the trench could increase the risk of pollution occurring within the cable trench.	
				Solution:	Mitigation measures should be identified to reduce the likelihood of infiltration of contaminated groundwaters into the trench. Similar mitigation should be committed to should sources of contamination be identified within the cable route to prevent the trench from acting as a preferential migration pathway.	

			Additional comments:	We note that the Table currently references the installation of a 'pipeline', this should be corrected.		
ID	**Theme**	**Issue**	**Comment**			**Applicant's Response**
EA39	Agricultural Land and Soils	Watching Brief	Outline Construction Environmental Management Plan [APP-192], Table 3-14	Issue:	The outline CEMP details proposals for the establishment of a watching brief and discovery strategy	Table 3-3 within the **Outline Construction Environmental Management Plan (oCEMP) [APP-192]** will be updated no later than Deadline 1 to clearly state that construction personnel will be provided briefings and toolbox talks which will identify visual and olfactory indicators of contamination and the need to implement protocols when these are encountered.
				Impact:	If not adequately understood by construction personnel, the watching brief may not be implemented correctly	
				Solution:	The table should clearly state that construction personnel will be provided briefings and toolbox talks, identifying visual and olfactory indicators of contamination and the need to implement the discovery protocol when these are encountered.	
			Additional comments:			
ID	**Theme**	**Issue**	**Comment**			**Applicant's Response**
EA40	Water Resources and Flood Risk	HDD Method Statement	Outline Construction Environmental Management Plan [APP-192], Section 2.5 and Table 3-13	Issue:	It is confirmed that any works relating to HDD will be undertaken in line with a Method Statement. This does not currently refer to the production of a Hydrogeological Impact Assessment for trenchless crossing works.	The **Outline Construction Environmental Management Plan (oCEMP) [APP-192]** already includes a commitment to completing a Hydrogeological Impact Assessment for trenchless crossing works, as the commitment is made for all watercourse crossings in the final bullet point in Table 3-13.
				Impact:	The HDD Method Statement may not be adequately protective if not informed by Hydrogeological Impact Assessment.	
				Solution:	The Applicant should refer to the use of Hydrogeological Impact Assessments to establish site	

					specific considerations for HDD crossings where impacts to sensitive controlled water receptors may occur.	
			Additional comments:			
ID	**Theme**	**Issue**	**Comment**			**Applicant's Response**
EA41	Water Resources and Flood Risk	Decommissioning of Cable Trench	Outline Decommissioning Environmental Management Plan [APP-194], Table 3-2	Issue:	There is no reference to the proposed presence of clay stanks or alternative impermeable material in the cable trench.	Flexibility has been intentionally maintained regarding the approach to cable decommissioning. Current industry good practice indicates that the most environmentally acceptable option is typically to leave cables in situ at the end of their operational life, as this avoids unnecessary soil disturbance and associated impacts. However, the final approach will remain subject to prevailing government policy, regulatory guidance, and best practice at the time of decommissioning. Should removal of the cables and associated ducting be deemed the most appropriate option at that time, this remains feasible. As set out in the **Outline Decommissioning Environmental Management Plan (oDEMP) [APP-194]**, the Applicant will undertake an analysis at the time of decommissioning to determine the balance of environmental impacts between removing the cables and leaving them in situ. This will include consideration of soil disturbance, potential environmental effects, and up-to-date policy and guidance, including any emerging requirements in relation to PFAS management. The agreed approach will be submitted for approval by the relevant local authority prior to decommissioning. The **oDEMP [APP-194]** will be updated to include a commitment for appropriate mitigation to be applied for impermeable structures such as clay stanks where removal of cabling is taken forward.
				Impact:	Decommissioning activities could damage impermeable seals, introducing new pollutant migration pathways following decommissioning.	
				Solution:	Any clay stanks or other impermeable structures introduced for groundwater protection purposes should be protected from damage or reinstated as part of decommissioning activities to prevent new preferential flow paths from being created.	
			Additional comments:			
ID	**Theme**	**Issue**	**Comment**			**Applicant's Response**
EA42	Water Resources and Flood Risk	Roles and Responsibilities	Outline Pollution and Spillage Response Plan [APP-198], Section 1.3	Issue:	It is unclear which key roles and responsibilities apply to which phases of the Proposed Development.	Noting paragraph 1.3.2 within the **Outline Pollution and Spillage Response Plan (oPSRP) [APP-198]** which states: "*These roles and responsibilities are indicative and will be confirmed in the final PSRP. It is noted that the undertaker retains ultimate responsibility for implementing the PSRP under the DCO",* paragraph 1.3.1 will be amended no later than
				Impact:	Risk that key roles may not be filled when required	

				Solution:	This Section should be updated to clearly identify which phase(s) each role is intended to be in place.	Deadline 1 to refer to the job titles discussed in the **Outline Operational Environmental Management Plan (oOEMP) [APP-193]** and the **Outline Decommissioning Environmental Management Plan (oDEMP) [APP-194]**, as appropriate. The **oDEMP [APP-194]** will also be updated no later than Deadline 1 to point explicitly to the **oPSRP [APP-198]**, in a similar way as done in Table 3-13 of the **oOEMP [APP-193]**.
			Additional comments:			
ID	**Theme**	**Issue**	**Comment**			**Applicant's Response**
EA43	Water Resources and Flood Risk	Pollution Incidents	Outline Pollution and Spillage Response Plan [APP-198], Section 2.1.1	Issue:	Some potential environmental incidents are not included in the list of pollution related issues.	Section 2.11 of the **Outline Pollution and Spillage Response Plan (oPSRP) [APP-198]** will be expanded no later than Deadline 1 to include these additional issues.
				Impact:	If not identified and mitigated against, pollution of controlled waters could result.	
				Solution:	The list of pollution related issues should be expanded to include: Application of pesticides and/or herbicides; Management and maintenance of oil/water interceptors if present.	
			Additional comments:			
ID	**Theme**	**Issue**	**Comment**			**Applicant's Response**
EA44	The Proposed Development and DCO Process	COMAH	Outline Construction Environmental Management Plan [APP-192], Table 3-8	Issue:	Reference is made to 'Consultation with the Pipeline Operators and HSE' for any decommissioning works falling within identified COMAH sites.	The text in Table 3-8 of the **Outline Construction Environmental Management Plan (oCEMP) [APP-192]** is referring to interaction with existing COMAH sites. The Proposed Development does not include a pipeline and will not be subject to COMAH regulations.
				Impact:	This may be an error as the development is understood not to include a pipeline component or be subject to COMAH.	
				Solution:	Clarification should be provided as to whether the COMAH reference is correct.	
			Additional comments:			

ID	Theme	Issue	Comment			Applicant's Response
EA45	Water Resources and Flood Risk	Flood Defences	Appendix 15.1 Flood Risk Assessment (FRA) [APP-179]	Issue:	Insufficient assessment of the impact of the proposed Cable Route Corridor on flood defences. More specifically, there is no assessment of how the cable route may interact with the foundation of flood defences and insufficient detail provided on the mitigation required to ensure these foundations are not disrupted and/or compromised.	Section 6.1.7 of **ES Volume 3, Appendix 15.1: Flood Risk Assessment (FRA) [APP-179]** states: "*the assessment considers the interactions between the Cable Route Corridor and EA flood defence assets using the AIMS Spatial Flood Defence dataset, ensuring that any potential impacts on the integrity and performance of these defences are identified and addressed.*" The Applicant notes this response. **ES Volume 3, Appendix 15.1: Flood Risk Assessment (FRA) [APP-179]** Annex H Section H.4 provides an assessment of interactions between the Cable Route Corridor and EA flood defence assets. Paragraphs H.4.2 – H.4.6 provides the available detail obtained from the AIMS database with regards defence make-up. The Applicant has committed to post-consent condition surveys (pre- and post-construction) for cable crossings of EA flood defence assets in **Appendix 15.1: Flood Risk Assessment (FRA) [APP-179]**, Section 3.3.4 (4). Whilst the EA will be able to insist on this as part of approval of Protective Provisions, the **Outline Construction Environmental Management Plan (oCEMP) [APP-192]** will be updated no later than Deadline 1 to record this. At detailed design stage the design of the cable route/construction methodology will be completed in such a way that any pre-existing piled foundations (including under flood defences) are not disrupted. This detail will be added to the **oCEMP [APP-192]** and **ES Volume 3, Appendix 1.3: Commitments Register [APP-145]** no later than Deadline 1. The Environment Agency Protective Provisions in the draft DCO will be amended to refer to needing EA approval for works to the reservoir, to ensure that approvals can be given pursuant to those provisions. The Applicant seeks to confirm that the reservoir referenced is that at Wistow, understood to be used for temporary flood storage. The Applicant would welcome any further details for review. However, the associated flood defence has been considered by the Applicant, and an assessment of interactions is included within **ES Volume 3, Appendix 15.1: Flood Risk Assessment (FRA) [APP-179]**. **Appendix 15.1: Flood Risk Assessment (FRA) [APP-179]** and the **oCEMP [APP-192]** consider relevant mitigation and management measures to
				Impact:	Risk of the Proposed Development causing the degradation of flood defences.	
				Solution:	Further information must be provided regarding the affected flood defences, including detail on the possible make-up of these defences. There is a possibility that flood embankments may have piled foundations, therefore the Applicant must ensure the cable route is designed in such a way that the piled foundations are not disrupted. The Applicant should commit to surveying the embankments along the River Ouse prior to finalising the detailed design of the cable route. This will need to consider future upgrading works to the embankments.	
			Additional comments:	The Applicant should be aware that the crossing below the River Ouse also crosses below a reservoir which is operated by the Environment Agency. Additional permission will need to be acquired through the Reservoirs Act to carry out these works, and this can be done when the Applicant come to undertake Protected Provisions.		

						avoid works being undertaken during flood conditions, as appropriate, and the implementation of a FWEP as outlined in Section 8.3 of **Appendix 15.1 Flood Risk Assessment (FRA) [APP-179]**.
ID	**Theme**	**Issue**	**Comment**			**Applicant's Response**
EA46	Water Resources and Flood Risk	Design Flood Level	Appendix 15.1 Flood Risk Assessment (FRA) [APP-179]	Issue:	A specific height for the design flood level has not been specified. This subsequently means that a specific height for finished floor levels of above ground infrastructure, heights of solar PV panels and soffit heights for watercourse crossings have not been provided.	FRA states in Section 4.2.13 "*Minimum finished floor levels (FFLs) for flood sensitive assets will be set to the 1 in 100-year plus 31 / 30% adopted climate change allowance plus 300 mm freeboard or set to the height of the credible maximum scenario – whichever is higher. In the event voided structures are used, freeboard will be a minimum of 600 mm. The specific FFLs for individual assets will be set at detailed design stage in accordance with these parameters*." **ES Volume 3, Appendix 15.1: Flood Risk Assessment (FRA) [APP-179]** Site-specific Annexe Sections C.4 and D.4 provide specific modelled flood depths at key locations to inform final FFLs. These FFLs are secured via the **Design Parameters and Commitments document [APP-217]**.
				Impact:	Risk of inaccurate heights being used for the design event, leading to a misrepresentation of flood risk.	
				Solution:	Specific levels for the design event should be provided, and the Proposed Development designed accordingly.	
			Additional comments:			
ID	**Theme**	**Issue**	**Comment**			**Applicant's Response**
EA47	Water Resources and Flood Risk	Solar PV Panel Freeboard	Appendix 15.1 Flood Risk Assessment (FRA) [APP-179], Sections 4.2.5, 7.3.17 and 7.4.23	Issue:	Solar PV panel freeboard above the design flood level is not clear. The influence of the solar PV panels on flood flows is also not clear.	**ES Volume 3, Appendix 15.1: Flood Risk Assessment (FRA) [APP-179]** confirms for Solar Development Sites 2 to 8, solar PV panels are located outside the modelled design flood extent. Accordingly, the panels at these sites would not be inundated during the design event, and the minimum separation between ground level and panel underside (0.4 m) effectively represents the available clearance in this scenario. Solar Development Site 1 is the only site where flooding occurs during the design event. At this location, the layout has been
				Impact:	Solar PV panels could flood, increasing flood risk elsewhere and compromising the operability of the Proposed Development. Additionally, flood	

					flows could be impacted, also increasing flood risk elsewhere.	developed to avoid placement of panels within the southern parcel where modelled flood depths exceed 1m. Panels are therefore located in areas of comparatively shallower flooding, consistent with the spatial planning approach set out in the **FRA [APP-179]** and in accordance with the sequential approach to site layout set out in Section 7.3 of the **FRA [APP-179]**. The Applicant notes that raising panels above the design flood level (plus additional freeboard) would represent a fundamental change to the agreed assessment methodology and design of the Proposed Development. The current approach, agreed through pre-application engagement, explicitly considers panels within the floodplain, with potential interactions with flows assessed through the volumetric assessment in Section 6.3 of the **FRA [APP-179]**. This approach also underpins the spatial configuration of the Solar Development Site 1 layout. On this basis, it is considered that the **FRA [APP-179]** demonstrates that the Proposed Development can operate safely over its lifetime and will not increase flood risk elsewhere, without the need to elevate panels above the design flood level. The assessment provided in Section 6.3 therefore remains appropriate and proportionate to the nature of the development and flood risk context. The Applicant also draws attention to the response provided to EA48 regarding further testing in the hydraulic model.
				Solution:	Where solar PV panels intersect the design flood extent, they should be raised to a minimum of 300mm above the design flood level.	
			Additional comments:	Section 4.2.5 describes how the minimum clearance between the bottom of the solar PV panels and the ground will be 0.4 metres. The FRA provides details on freeboard allowances above the design flood level for sensitive infrastructure such as the substations and Integrated Conversion Units (ICUs), but no detail appears to be presented regarding freeboard to the bottom of the solar PV panels. For clarity we would not consider it acceptable for solar PV panels to flood in the design flood event unless robust justification can be provided in terms of how the development will be operational for its lifetime without increasing flood risk elsewhere. Sections 7.3.17 and 7.4.23 state that neither the panel nor its mounting structure is considered to impede the flow of water. If the solar PV panel is raised above the design flood level this statement is broadly correct, however, if the solar PV panels themselves are submerged this could present quite a large surface area and barrier to flow, particularly if this is across multiple panels. We would ask that the solar PV panels themselves are raised above the design flood level plus a minimum 300mm allowance for freeboard. If this cannot be achieved in some areas robust justification will need to be provided highlighting the number of panels that will be submerged, the impact this has on flood flow routes and flood risk to third parties through testing within the respective hydraulic models, and how the operability of	

				the development is not compromised if solar PV panels are submerged.		
ID	**Theme**	**Issue**	**Comment**			**Applicant's Response**
EA48	Water Resources and Flood Risk	Offsite Flood Risk	Appendix 15.1 Flood Risk Assessment (FRA) [APP-179], Sections 6.3.13, 6.3.14 and 6.3.21	Issue:	The FRA confirms that there will be a 4mm increase in flood depth in Site 1, and as such a 4mm increase in flood depth is estimated across the whole site. However, the FRA does not state where these increases will occur and if they will have offsite impacts.	The Applicant notes that the approach and the methodology were previously agreed with the EA in a meeting in November 2025. In that engagement, the EA supported a proportionate two-step approach: (1) volumetric calculation to quantify displaced volume & indicative level change; (2) if results show more than fractions of a millimeter or enter millimeter/centimeter range, consider supplementary modelling to understand where increases occur relative to the site boundary. A similar approach was accepted by the EA on the "One Earth" solar DCO project. In this case, the volumetric assessment presents a conservative upper-bound estimate, assuming the full displaced volume is accommodated entirely within the flooded area of Solar Development Site 1 (equating to a 4mm increase in flood depth). Given any hydraulic redistribution beyond the flooded footprint of Solar Development Site 1 would reduce the equivalent depth increase in direct proportion to the increase in receiving area, the resulting increase is considered to be negligible and in the region of fractions of a millimetre. To provide additional context to this, the Applicant has undertaken a GIS-based review of the wider hydraulically connected floodplain associated with comparable peak water levels during the modelled event. Analysis of the peak flood levels across the inundated area of Site 1 identified an average peak water level of approximately 7.093m AOD with a standard deviation of approximately 1mm, demonstrating an extremely flat hydraulic response across the wider floodplain system. Using comparable peak flood levels between 7.088m AOD and 7.098m AOD (i.e. within ±5mm), the hydraulically connected
				Impact:	Risk of increasing offsite flood risk and therefore causing impacts to third parties.	
				Solution:	The FRA must be updated with evidence to demonstrate that any increases in flood level due to the solar panel support frames and ICUs would remain on site. We also request that further information is provided on the bird mitigation area within Site 1 and the additional storage this may provide. All compensation should be provided on a level for level and volume for volume basis. The Applicant should also repeat the volumetric calculations for the design flood event (see additional comments box).	

			Additional comments:	The FRA notes that based on the volumetric assessment, a 4mm increase in flood level is estimated across Site 1. The calculated displaced volume of 6626m^3 is a notable amount, although it is appreciated this is based on a Credible Maximum scenario rather than the design flood event. The volumetric calculations should also be undertaken for the design flood event as this is critical for understanding impacts to third parties along with informing the design of any mitigation. The volumetric assessment is welcomed, but paragraph 5.8.12 of the National Policy Statement for Energy (EN-1) states: "*Development should be designed to ensure there is no increase in flood risk elsewhere, accounting for the predicted impacts of climate change throughout the lifetime of the development. There should be no net loss of floodplain storage and deflection, or constriction of flood flow routes should be safely managed within the sit*". The Applicant should consider how the development meets these criteria and describe this clearly within the FRA referring to policy. It is noted that given the size of the floodplain, any changes could potentially be diluted over a large area, but we cannot be certain that the increases would remain on site. As noted above, re-running the calculations for the design event particularly for Site 1 would be helpful. It will be also important to assume the correct development design configuration in this context. For example, whilst inundation of the solar panel support frames is reasonable, we would not support the inundation of the solar PV panels themselves in the design flood event. This is because they have the potential to have more of an effect on flood flows and	floodplain area extends to approximately 18,252,600m², compared to approximately 1,719,000m² within the flooded area of Site 1 itself (i.e. the connected floodplain area is over ten times larger). This demonstrates that realistic redistribution of displaced floodwater would occur across a substantially larger connected floodplain area than the site footprint alone, reducing the equivalent theoretical increase in flood level proportionally to well below 1mm. A shapefile illustrating the identified hydraulically connected floodplain area has been shared with the EA for their consideration. At this order of magnitude, supplementary hydraulic modelling within a 25m grid is not considered to provide additional clarity and would risk introducing non-physical elements that exceed the conservatively derived upper bound **ES Volume 3, Appendix 15.1: Flood Risk Assessment (FRA) [APP-179]** will be updated with this information concluding the residual level change is sub-1mm no later than Deadline 1. The exact volume of storage that will be created within the Bird Mitigation Area within Solar Development Site 1 will be confirmed at the detailed design stage. It is anticipated that this will take the form of a simple volumetric assessment and not require detailed hydraulic modelling, given what is explained above.

				could affect the operability of the development. Given the more notable flood depths in the southeastern portion of Site 1 and the current volumetric calculations which solely focus on the Credible Maximum scenario, the Applicant will need to undertake the following: 1. Clearly demonstrate that any increases in level will be contained within the order limits for the development by revisiting the volumetric calculations for the design flood event and using the correct development design parameters. If level increases are of the same order of magnitude for the design event as the credible maximum scenario for Site 1, it may be necessary to test the impact of the solar panel support frames using a flow constriction and storage reduction factor approach within the Lower Ouse hydraulic model. This will help to provide the spatial clarity regarding any level increases with respect to the order limits for the development. 2. Provide details and a commitment to include compensatory storage within the bird mitigation area if it cannot be demonstrated that any increases in flood risk cannot be contained within the order limits for the development.	

ID	Theme	Issue	Comment			Applicant's Response
EA49	Water Resources and Flood Risk	Land Raising	Appendix 15.1 Flood Risk Assessment (FRA) [APP-179], Section 7.3.18	Issue:	Potential loss of floodplain storage at substations.	The **Design Parameters and Commitments document [APP-217]** (which is secured via DCO Requirement) will be updated no later than Deadline 1 to make this commitment.
				Impact:	Risk of increasing flood risk elsewhere.	
				Solution:	There should be a commitment within the DCO to compensate for any land raising within the design flood extent.	

			Additional comments:	Section 7.3.18 states that substations will be designed so that any earthworks, foundations and SuDS features will not result in land take from the floodplain. Whilst this is welcomed, it should be secured through a commitment within the DCO.		
ID	**Theme**	**Issue**	**Comment**			**Applicant's Response**
EA50	Water Resources and Flood Risk	Breach Location	Appendix 15.1 Flood Risk Assessment (FRA) [APP-179], 7.4.34	Issue:	Breach Location 1 may not represent the full residual risk to Site 4.	The Applicant notes this comment. The breach locations modelled were selected based on defence condition, crest-to-toe relationships, and proximity to the site, in order to represent credible and proportionate worst-case scenarios. The results indicate that, in the vicinity of Solar Development Site 4, significant overtopping occurs during the design event, which is the dominant flood mechanism influencing the site. The potential for alternative breach locations along the wider embankment system is recognised as part of the inherent residual risk associated with defended floodplains and is considered within the planning and design approach. Breach modelling was discussed and agreed with the EA during a meeting in January 2025. At that meeting, the Applicant set out that it proposed a single breach scenario at the most credible worst-case location for Solar Development Sites 3 and 4, rather than multiple breaches along the wider embankment system, and the EA were in agreement with this approach. The breach assessment was therefore undertaken is line with the agreed methodology. Additionally, given overtopping is already the dominant flood mechanism during the design event, it is unlikely that alternative breach locations would result in materially greater impacts than those already assessed.
				Impact:	Residual risk may be underestimated.	
				Solution:	The Applicant should consider the residual risk to Site 4 associated with the Birkin Road embankment around the washland.	
			Additional comments:	It is noted that Breach Location 1 does not result in notably different flood extents when compared to the defended design flood extent (1 in 100 year plus 31% climate change). The modelling report notes that this is because there is significant overtopping in the area already. Whilst this is correct, there remains a residual flood risk to the development associated with the Birkin Road embankment around the washland (approximate grid reference: 455130, 426900). If this were to breach, the risk of flooding to Site 4 would be greatly increased. The Applicant should consider this residual risk, particularly in the context of sensitive infrastructure such as the		

				substation and ICUs within Site 4 and update the FRA accordingly.		Birkin Holme Washland flood storage area (i.e. the southern section of Solar Development Site 4) has been removed from the Order Limits. Please see **ES Volume 2, Figure 1.1: Site Location Plan and Order Limits Compressed [AS-017]**.
ID	**Theme**	**Issue**	**Comment**			**Applicant's Response**
EA51	Water Resources and Flood Risk	Functional Floodplain	Appendix 15.1 Flood Risk Assessment (FRA) [APP-179]	Issue:	It is not clear whether any aspects of the development fall within the Functional Floodplain (Flood Zone 3b).	The Proposed Development is classified as Essential Infrastructure, for which the Exception Test applies in both Flood Zone 3a and 3b. As such, the policy trigger for the Exception Test in **ES Volume 3, Appendix 15.1: Flood Risk Assessment (FRA) [APP-179]** is the presence of Flood Zone 3, irrespective of whether this is 3a or 3b. FZ3b data isn't available in the SFRA and therefore is not available, however, the EA definition of functional floodplain has been used to define the southern washlands (now removed from the Order Limits) as Flood Zone 3b.
				Impact:	Gaps in information make it difficult to understand potential impacts.	
				Solution:	Confirmation should be provided if any aspects of the development are within the Functional Floodplain.	
			Additional comments:	Whilst the FRA describes how some aspects of the development (such as Site 5) have been removed because they were in areas of Functional Floodplain, it is not clear whether any other areas of the Proposed Development remain in Functional Floodplain. It is acceptable for Essential Infrastructure to be placed within the Functional Floodplain if appropriate mitigation is put in place, however it would be helpful if areas where this is the case can be highlighted within the FRA so this can be reviewed in the context of policy.		

ID	Theme	Issue	Comment			Applicant's Response
EA52	Water Resources and Flood Risk	Fencing	Appendix 15.1 Flood Risk Assessment (FRA) [APP-179]	Issue:	Locations of proposed palisade fencing and general fencing has not been provided.	Detailed fencing locations and their relationship to the design flood extent and the Functional Floodplain, is not known at this stage of design. The **Design Parameters and Commitments document [APP-217]** will be updated no later than Deadline 1 to state that where fencing intersects flood risk zones it should be designed to ensure blockage risk is kept to a minimum and that there are no impacts on flood flow routes. These additions are not inconsistent with the fencing parameters and commitments already included within the **Design Parameters and Commitments document [APP-217]**. Additionally, **ES Volume 3, Appendix 15.1: Flood Risk Assessment (FRA) [APP-179]** concludes that flood velocities are low, and paragraph 6.3.18 considers that the floodplain predominantly comprises arable and pastoral land with no significant buildings, walls, stored materials or other features that could generate large floating debris. In addition to measures such as post-flood event debris clearance, it is considered the risk of blockage is low. With these commitments made, it is considered that fencing can be designed such that it would not impact upon flood flows.
				Impact:	Risk of flood flow paths being impacted and increasing flood risk elsewhere.	
				Solution:	A map or plan should be provided which shows the locations of the proposed fencing in the context of the design flood extent and Functional Floodplain (Flood Zone 3b). The Applicant should consider the effects of palisade fencing on flood risk elsewhere, particularly where this intersects the Flood Zones and particularly the Functional Floodplain. Where fencing intersects flood risk areas it should be designed to ensure blockage risk is kept to a minimum and that there are no impacts on flood flow routes.	
			Additional comments:			

ID	Theme	Issue	Comment			Applicant's Response
EA53	Water Resources and Flood Risk	Hydraulic Modelling	Appendix 15.1 Flood Risk Assessment (FRA) [APP-179]	Issue:	Outstanding comments on the hydraulic modelling.	(1) The behaviour identified by the EA originates from the EA model as supplied, rather than anything introduced as part of the Application. To confirm this, the Applicant has reviewed the original model files as received (i.e. prior to any use or processing by the Applicant) and reviewed the inflow boundary conditions directly. This confirms that: - the +20% and +30% scenarios are applied as expected (i.e. 1.2x and 1.3x relative to baseline); - the +50% scenario is consistently implemented using a multiplier of approximately 1.44x across all inflow units. This scaling is therefore present in the original EA model setup, and has not been modified or altered as part of the Applicant's application of the model.
				Impact:	There are some uncertainties which remain in the modelling which could have an impact on the assessment of flood risk.	
				Solution:	Please respond to comments raised on the hydraulic modelling of the River Aire and Ouse. Further detail is provided below.	
			Additional comments:	The Environment Agency has reviewed hydraulic models for the River Aire, River Ouse, and site 1 and site 2. Two outstanding comments remain with respect		

				to the Aire and Ouse models. These are as follows: 1. A review of the scaling factors applied to the hydraulic model for the Lower Ouse and Wharfe Washlands model for the Upper climate change scenario shows that a scaling factor of 1.44 has been applied to the flow time (QT) boundaries within the model. This is consistent with the existing Environment Agency (Mott Macdonald, 2017) hydraulic model. This is slightly below the Upper climate change allowance of +48% for the Wharfe and Lower Ouse management catchment but is a slight deviation from what is expected and suggested in the model report produced by Arthian. This may have implications for assessing the credible maximum water level within the area of interest. 2. With respect to the River Aire modelling, the median annual flood (QMED) from flow at the Oulton Lemonroyd gauge (27080) in the JBA (2016) hydrological assessment was 154.8 m3/s. The current QMED from AMAX data at station 27080 according to the National River Flow Archive (NRFA) is 157m3/s. QMED from AMAX data in the JBA (2016) hydrological assessment for the Methley gauge on the Calder (27079) was 228.3m3/s. The current QMED from AMAX for the Methley gauge according to the NRFA is 240m3/s. In both cases a slight increase, particularly for the Calder, is observed. The design event flows (1 in 100 year plus 31%) could potentially be slightly underestimated. It would be prudent to either undertake a review of the hydrology to double check the statistical estimates for the design	The EA modelling report defines the CC2 scenario as a +50% fluvial uplift, but does not set out how this is implemented within the hydraulic model itself. The 1.44x factor may therefore reflect the way the uplift has been incorporated into the supplied hydrographs (potentially linked to the volume-based Scenario B inflow construction), rather than a simple peak-based scaling. In applying the model, the Applicant has therefore used the supplied hydrology as-is, consistent with standard practice when working from an approved baseline EA model. The hydrology was not updated due to the scale and complexity of the contributing catchment, and this approach was agreed in early meetings with the EA and has been supported through sensitivity testing undertaken as part of the assessment. This sensitivity testing included variation of inflows and alternative climate change uplifts, and demonstrated that the model is not particularly sensitive to changes in flow, with only relatively minor variations in peak levels and flood extents observed. On this basis, whilst the implemented CC2 uplift within the supplied model equates to +44% rather than +48% in line with current guidance, the difference in flow is small in absolute terms and falls well within the ranges already tested. It is therefore not expected to result in a material change to model outputs or the conclusions of the assessment. Given this, and the fact that: - the current setup reflects the baseline EA model configuration; - the hydrology has been applied consistently and without modification; and - sensitivity testing demonstrates limited model sensitivity to flow variations, the uplift has been applied in accordance with the supplied model, and the difference between the implemented and nominal uplift is not material to the conclusions. The Applicant's view is that the existing model is therefore suitable for assessment of the upper climate change scenario for the purposes of this FRA. (2) The updated QMED values from the NRFA represent only a minor increase and are not considered material in the context of a large, slow-responding system such as the Aire and Calder. The adopted hydrology has been reviewed and retained on the basis of catchment scale, stability, and the absence of any

					flood event or alternatively, as a precautionary approach, use the 1 in 100 year plus 51% (upper) climate change scenario as the design scenario to ensure any development for Site 4 is resilient to the upper climate change scenario and would not increase flood risk elsewhere. It would be helpful if the Applicant could respond to the points raised on the hydraulic modelling above and how these comments are addressed in the assessment of flood risk within the FRA.	substantive change in gauging evidence or catchment behaviour. This is set out within the Hydraulic Modelling Report (Annex I to **ES Volume 3, Appendix 15.1: Flood Risk Assessment (FRA) [APP-179]**), which also demonstrates that uncertainty in peak flows has been addressed through sensitivity testing (as agreed in a meeting with the EA in January 2025) and the application of updated climate change allowances, including higher and upper scenarios. Given this, revisiting the baseline hydrology would not materially alter the assessment, and the current approach is considered proportionate and robust. In respect of the recommendation to adopt the 1 in 100-year plus 51% climate change event as the 'design scenario' for Solar Development Site 4, the FRA already adopts a precautionary design approach, agreed with the EA, as follows: Finished floor levels for flood-sensitive elements are required to be set to the higher of either the design flood level plus 300mm freeboard or the flood level associated with the 1 in 100 year plus 51% climate change scenario (the credible maximum scenario). Accordingly, where the latter would result in higher flood levels than the design event, this scenario already governs design outcomes, and in the design scenario (where no flooding occurs), the formal designation of the credible maximum scenario as the design event would not alter the physical design response. On this basis, the FRA is considered to already meet the intent of a precautionary approach for Solar Development Site 4, and no additional design change is required.
ID	**Theme**	**Issue**	**Comment**			**Applicant's Response**
EA54	Water Resources and Flood Risk	Requirement 10 – Surface and Foul Water Drainage	Draft Development Consent Order [APP- 017], Schedule 2 – Requirements, 10(1)	Issue:	The Environment Agency is not listed as a named consultee for the discharge of Requirement 10 (Surface and Foul Water Drainage).	The DCO will be updated to make the EA a consultee for Requirement 10.
				Impact:	Increased risk of detrimental impacts to controlled waters if the surface water drainage scheme and (if any) foul water drainage system does not include sufficient mitigation.	
				Solution:	We request to be consulted on the surface water drainage scheme and (if any) foul water drainage system to be approved under Requirement 10.	

			Additional comments:			
ID	**Theme**	**Issue**	**Comment**			**Applicant's Response**
EA55	Water Resources and Flood Risk	Requirement 13 – Operational Environmental Management Plan	Draft Development Consent Order [APP-017], Schedule 2 – Requirements, 13(1)	Issue:	The Environment Agency is not listed as a named consultee for the discharge of Requirement 13 (Operational Environmental Management Plan)	The DCO will be updated to make the EA a consultee for Requirement 13.
				Impact:	Increased risk of detrimental impacts to controlled waters if the OEMP do not include sufficient mitigation.	
				Solution:	We request to be consulted on the OEMP to be approved under Requirement 13.	
			Additional comments:			
ID	**Theme**	**Issue**	**Comment**			**Applicant's Response**
EA56	The Proposed Development and DCO Process	Requirement Wording	Draft Development Consent Order [APP-017], Schedule 2 – Requirements	Issue:	Numerous Requirements state that detailed management plans "must be substantially in accordance with" the outline version of the management plan.	This is not agreed. The reference to 'substantially in accordance with' is extremely well precedented in DCOs and has therefore been consistently found to meet the NPS tests. It does not make the Requirement unenforceable as, ultimately, the final versions of the relevant plans (which will account for the final construction methodology which may mean that, for example, certain measures are not required), need to be approved before construction commences.
				Impact:	Using the term "substantially" results in a Requirement being unenforceable and is not precise. This is against government policy (National Planning Policy Framework (NPPF)) and the six tests sited in Paragraph 57 of the NPPF.	
				Solution:	The Environment Agency requests the removal of the term "substantially" from the affected Requirements, particularly those where we are/wish to be a named consultee:	

					Requirements 5, 10, 12, 13 and 19.	
			Additional comments:			
ID	**Theme**	**Issue**	**Comment**			**Applicant's Response**
EA57	The Proposed Development and DCO Process	Environment Agency Protective Provisions	Draft Development Consent Order [APP- 017], Schedule 15 – Part 4 – For the Protection of the Environment Agency	Issue:	The Protective Provisions included in the draft DCO for the protection of the Environment Agency do not match our standard Protective Provisions.	This has been discussed with the Environment Agency, and agreement on the form of the PPs has been reached (and will be accounted for in the next iteration of the DCO), save for the amend made in response to EA45 above, which will be discussed with them.
				Impact:	Risk of the Environment Agency not agreeing to the disapplication of FRAPs.	
				Solution:	Schedule 15 – Part 4 of the draft DCO should be updated to include the Environment Agency's standard Protective Provisions.	
			Additional comments:			
ID	**Theme**	**Issue**	**Comment**			**Applicant's Response**
EA58	The Proposed Development and DCO Process	Discharge of Requirements Procedure	Draft Development Consent Order [APP- 017], Schedule 16 – Procedure for Discharge of Requirements	Issue:	As a named consultee on the discharge of several Requirements, we request the provision of at least 21 calendar / 15 business days in which to respond to the discharge authority.	The period to be given to consultees is left to the discretion of the local planning authority. Schedule 15 gives the local planning authority six weeks to make a decision. The local planning authority would then give the consultees an indication of when they wish to receive responses to meet that deadline. It also requires the Applicant to serve the consultees with the information at the same time, so there is no delay in the EA being able to consider it.
				Impact:	In order to effectively carry out our role we will need to maintain our requirement to have 21 days to respond to planning consultations.	
				Solution:	The draft DCO should be updated to reflect this.	
			Additional comments:	This request aligns with the 21 day consultation period (or equivalent working/business day period) for planning application consultations in The Town and Country Planning (Development		

				Management Procedure) (England) Order 2015.	

The Applicant's Response to other statutory bodies and local authorities

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
UK Health Security Agency				
HSA-01	UK Health Security Agency	Human Health	Thank you for your consultation regarding the above development. The UK Health Security Agency (UKHSA) welcomes the opportunity to comment on your proposals at this stage of the project. Please note that we request views from the Office for Health Improvement and Disparities (OHID) and the response provided is sent on behalf of both UKHSA and OHID. We are satisfied that the Proposed Development should not result in any significant adverse impact on public health. On that basis we have chosen NOT to register an interest with the Planning Inspectorate. Please do not hesitate to contact us if you have any questions or concerns.	The Applicant notes this comment.
National Highways				
NH-01	National Highways	Lands/CPO	At this stage, NH objects to the DCO and the Authorised Development as currently proposed for the following reasons: a. Proposed compulsory acquisition of NH's operational land and/or acquisition of new rights that could interfere with NH's undertaking and/or the potential to extinguish existing rights held by NH without suitable controls imposed.	The Applicant makes note of this comment and confirms that details of the permanent and temporary rights to be acquired are set out in the **Book of Reference [APP-022]**. The Applicant considers that the Protective Provisions for NH's benefit included in the **Draft Development Consent Order (DCO) [APP-017]** ensure that NH's land interests are protected. It notes that the land powers in the DCO are subject to NH's consent, which is the same outcome which NH's suggested form of the PPs requires.
NH-02	National Highways	Transport and access	At this stage, NH objects to the DCO and the Authorised Development as currently proposed for the following reasons: Deficiencies or uncertainties in respect of the potential for impacts on the SRN from a traffic and transport perspective, as assessed by the Applicant. Many of NH's concerns in this respect reflect or build on comments raised as part of its review of the Preliminary Environmental Information Report ("PEIR"). These deficiencies are set out in paragraph 6 of this representation.	The Applicant notes this comment and that it has sought to engage with National Highways proactively and responds to the detail of the points below.
NH-03	National Highways	Transport and access	NH considers that without the NH protective provisions , there is a considerable risk of serious detriment to the SRN, as any damage or injury to the SRN or wider highway estate would require funding to rectify that is not within NH's budget. There is no recourse to public funding for emergency works of this nature and a reserve of funding is not available. Without prejudice to whether the Authorised Development would cause a	The Applicant notes National Highways' concern regarding the potential for impacts to the Strategic Road Network. The Order Limits do not interact with the SRN; National Highways has interests in land within the Order Limits, near to the A19 which forms part of the local road network. Notwithstanding this limited interaction with National Highways' undertaking, Protective Provisions for National Highways are included as Part 6 of Schedule 15 to the **Draft Development Consent Order (DCO) [APP-017]**. The Applicant is seeking to agree the form of these with National Highways. It is

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
			serious detriment to the SRN, it remains the case that the public purse should not be left to meet or subsidise costs of impacts caused by third party development to the SRN.	confident that no serious detriment will be caused to National Highways' undertaking from the Proposed Development with these Protective Provisions in place.
NH-04	National Highways	Transport and access	Further, NH's estate comprises more than just the corpus of the highway (the 'top two spits'). Unlike local roads, where the local highway authority typically controls only the highway strata and sufficient vertical limits above and beneath the highway to maintain necessary apparatus and street furniture, in most cases NH controls the freehold of the land beneath the highway to the centre of the earth and to the heavens above. This estate is held for the benefit of the statutory undertaking, to ensure that the SRN is not compromised and that maintenance or improvement works at any required depth can take place free from risk of trespass or ransom. Where apparatus is co-located in the highway (which is commonplace), that apparatus has been authorised by NH or has been installed through industry standard processes (such as under the New Roads and Street Works Act 1991), where statutory protection is afforded to NH as the highway or street authority. Whilst NH is prepared to grant a sub-surface interest or rights to co-locate apparatus in the highway, where it is geotechnically possible and respecting other apparatus that is in, on, under or over the highway – the interest must be proportionate and necessary and cannot be to the detriment of NH, the SRN or other undertakers. It cannot be acceptable that apparatus is placed in, on, under or over the SRN through a DCO by disapplying statutory protections that NH has and not accepting to acquiesce to the terms which are required by NH to manage its network in accordance with regulatory requirements.	The Applicant notes National Highways' comments regarding the extent of its land and infrastructure. The Applicant has been and will continue to seek to agree the form of protective provisions with National Highways and is confident that no serious detriment will be caused to National Highways' undertaking as a result of the Proposed Development.
NH-05	National Highways	Transport and access	For the sake of clarity and transparency, NH has no desire to stymy development or to impose requirements on the Applicant which are disproportionate to the potential harm that could be caused to the SRN. NH is legally obliged to co-operate with third parties exercising planning or highway functions, which includes the Applicant in this statutory process. NH is prepared to engage fully and assist in whatever way is reasonable to ensure that the Authorised Development proceeds as quickly and efficiently as possible.	The Applicant notes National Highways' position and confirms that it is seeking to agree the form of protective provisions to be included in the DCO.
NH-06	National Highways	Transport and access	The key interfaces between the Authorised Development and the SRN that will be impacted	The Applicant makes note of this comment. **ES Volume 2, Figure 14.1: Highway Network [APP-110]** presents information on the Highway Network in the context of the draft Order Limits. The Proposed Development does not

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
			include sections of the A64 to the north, the M62 to the south, and the A1(M) to the west.	directly interface with the A64, M62 or the A1(M). **ES Volume 1, Chapter 14: Traffic and Movement [APP-052]**, Section 14.10, discusses the traffic distribution methodology and assignment to the SRN. The A1(M) is the only National Highways managed route within the Study Area. The **Transport Assessment (TA) [APP-178]** provides trip generation forecasts. There are no traffic management proposals on the SRN, with the exception that there may be a requirement to transport abnormal loads. NH will be consulted in advance regarding any proposals to transport abnormal loads on the SRN, pursuant to the regulatory requirements for such movements.
NH-07	National Highways	Transport and access	[Traffic and Movement APP-052] The Applicant should provide a detailed methodology for the TEMPro growth factors used to uplift baseline traffic data and forecast future baseline traffic flows.	The Applicant makes note of this comment. A detailed methodology for how TEMPro growth factors were calculated and applied is covered in Section 2.3 of the **Transport Assessment (TA) [APP-178]**.
NH-08	National Highways	Transport and access	[Traffic and Movement APP-052] The Applicant should secure a requirement for a Decommissioning Traffic Management Plan, to be submitted to and approved in consultation with NH before decommissioning commences.	The Applicant makes note of this comment. An **Outline Decommissioning Environmental Management Plan (oDEMP) [APP-194]** has been developed. The development of a Decommissioning Traffic Management Plan (DTMP) is a commitment in the oDEMP and will need to be approved prior to the commencement of the decommissioning phase of the Proposed Development. The **Draft Development Consent Order (DCO) [APP-017]** will be updated to set out that the Outline DEMP must be consulted upon with the relevant highways authority, which will include National Highways where traffic movements use strategic highways.
NH-09	National Highways	Transport and access	[Traffic and Movement APP-052] The Applicant should outline a strategy to monitor the implementation of the proposed travel schedules for deliveries and construction workers.	The Applicant makes note of this comment. An **Outline Construction Traffic Management Plan (oCTMP) [APP-201]** has been prepared, which includes a commitment for construction vehicles to avoid travel during peak highway network periods. Monitoring processes are outlined within Section 3.21 of the **oCTMP [APP-201]**. A final Construction Traffic Management Plan (CTMP) will be developed by the appointed Principal Contractor (PC) prior to the commencement of construction. This will set out the measures to be implemented, including the use of a vehicle booking system to minimise, where reasonably practicable, construction traffic movements during peak hours. The detailed CTMP must be approved by the relevant planning authority in consultation with the relevant highway authority, which will be National Highways for any measures that apply to the SRN.
NH-10	National Highways	Transport and access	[Traffic and Movement APP-052] The Applicant should involve NH as early as practicable in the management and routing of any Abnormal Indivisible Loads.	The Applicant makes note of this comment. As reported in the **Abnormal Load Report (Annex C of the Transport Assessment (TA) [APP-178])**, the Applicant will comply with the relevant processes to agree access to the Proposed Development. The relevant team within National Highways have been made aware of the AIL requirements for this project.
NH-11	National Highways	Transport and access	6.7 The Applicant should notify NH of any amendments to construction routing where those changes may affect the SRN.	The Applicant makes note of this comment. An **Outline Construction Traffic Management Plan (oCTMP) [APP-201]** has been prepared which provides detail on construction vehicle routing. Any changes to construction routing would be identified and secured through the final Construction Traffic

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				Management Plan (CTMP), which must be approved by the relevant planning authority in consultation with the relevant highway authority, which will be National Highways for any measures that apply to the SRN. For further context, traffic diagrams have been provided and detail discussed at meetings with NH. Analysis showed construction traffic resulted <1% change in daily traffic flows at the A1(M) junction 42. To give an indication on the potential impacts during the network peaks, information from other solar developments was reviewed and discussed with NH. This resulted in an estimated impact at the A1(M) junction of up to 20 additional trips in total (10 each way) during the highway network AM and PM peaks.
NH-12	National Highways	Transport and access	Outline Construction Traffic Management Plan (oCTMP) [APP-201]: The Applicant should agree any signage proposed on the SRN with the relevant NH team before works commence.	The Applicant notes this comment. The detailed CTMP which will include details of the proposed signage when this is known. The detailed CTMP must be approved by the relevant planning authority after consulting with the relevant highway authority, which will be National Highways for any measures that apply to the SRN. Protective provisions for National Highways are also included at Part 6 of Schedule 15 to the **Draft Development Consent Order (DCO) [APP-017]** and the Applicant is seeking to agree the form of these protective provisions.
NH-13	National Highways	Transport and access	Outline Construction Traffic Management Plan (oCTMP) [APP-201] The Applicant should ensure that any works on the SRN, including temporary signage, are supported by a safety audit and risk assessment and, where inside the redline boundary are carried out in accordance with NH's protective provisions. If works are necessary on the SRN outside the redline boundary they must be progressed through a Section 278 Agreement.	The Applicant notes this comment. No works are expected on the SRN. If signage is required, it would be agreed with the relevant highway authorities prior to commencement of construction.
NH-14	National Highways	Transport and access	Outline Construction Traffic Management Plan (oCTMP) [APP-201] The Applicant should ensure that vehicular trips generated by waste management activities are included in the assessment of construction traffic impacts on the SRN.	The Applicant makes note of this comment. Construction trip forecasts are based on trips from other construction sites and include the removal of any waste materials.
NH-15	National Highways	Transport and access	Outline Construction Traffic Management Plan (oCTMP) [APP-201] The Applicant should include in the final Construction Traffic Management Plan the traffic management measures identified in the Outline Construction Environmental Management Plan.	The Applicant makes note of this comment. The **Outline Construction Traffic Management Plan (oCTMP) [APP-201]** has been prepared alongside the **Outline Construction Environmental Management Plan (oCEMP) [APP-192]** and forms part of the overall approach to managing construction effects. The final Construction Traffic Management Plan will be secured through the Development Consent Order and will incorporate relevant traffic management measures identified within the Environmental Management Plans, ensuring a coordinated approach to construction management.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
NH-16	National Highways	Transport and access	Outline Decommissioning Environmental Management Plan [APP-194]: NH requests that it is included in the list of identified stakeholders.	The **Draft Development Consent Order (DCO) [APP-017]** will be updated to set out that the **Outline Decommissioning Environmental Management Plan (oDEMP) [APP-194]** must be consulted upon with the relevant highways authority, which will include National Highways where traffic movements use strategic highways.
NH-17	National Highways	Protective Provisions	[DCO, Protective Provisions and Compulsory Acquisition]: NH welcomes the inclusion of protective provisions for its benefit in Schedule 15 of the draft DCO which address a number of concerns it would otherwise have regarding some of the articles within the draft DCO. That said, these protective provisions are not agreed. The protective provisions included in the draft DCO do not reflect the template provisions that NH asks to be included in DCOs for this nature. A copy of NH's template protective provisions are appended to this Relevant Representation. NH requests that the Applicant includes this version of the protective provisions when next updating the draft DCO.	The Applicant notes this comment and confirms that it has been and is continuing to seek to agree the form of protective provisions with National Highways.
NH-18	National Highways	Protective Provisions	[DCO, Protective Provisions and Compulsory Acquisition]: Schedule 2 of the draft DCO includes a requirement for a construction traffic management plan and a need for the Applicant to consult with the relevant highway authority. This is welcomed. NH asks that a similar obligation is imposed in respect of the requirement for decommissioning to ensure that NH is consulted on the traffic management at that stage.	The Applicant notes this comment. Requirement 19 (decommissioning and restoration) will be updated to require consultation with the relevant highway authority (which captures National Highways) in the next version of the **Draft Development Consent Order (DCO) [APP-017]**.
NH-19	National Highways	Lands/CPO	[DCO, Protective Provisions and Compulsory Acquisition]: The draft DCO includes powers of compulsory acquisition and temporary possession and the acquisition of rights in respect of 52 plots listed in the Book of Reference as being owned by NH, or over which NH has an interest.	The Applicant makes note of this comment and confirms that details of the permanent and temporary rights to be acquired are set out in the **Book of Reference [APP-022]**. The Applicant acknowledges the comments made in regards to inclusion of powers of compulsory acquisition and the Applicant is actively engaging with National Highways to reach an agreed approach to these matters via the Protective Provisions.
NH-20	National Highways	Lands/CPO	[DCO, Protective Provisions and Compulsory Acquisition]: To safeguard NH's interests and the safety and integrity of the SRN, NH objects to powers of compulsory acquisition being granted in respect of NH's operational land, and to any extinguishment of rights enjoyed by NH for the purposes of carrying on its undertaking. NH is currently reviewing its land interests against the Book of Reference and will provide more detail in its Written Representation but for the purposes of this Relevant Representation NH objects to the compulsory acquisition of its land and interests.	The Applicant makes note of this comment and confirms that details of the permanent and temporary rights to be acquired are set out in the **Book of Reference [APP-022]**. The Applicant notes that NH's land interests within the Order Limits and recorded in the Book of Reference do not form part of the SRN. The Applicant acknowledges the comments made in regards to inclusion of powers of compulsory acquisition and the Applicant is actively engaging with National Highways to reach an agreed approach to these matters via the Protective Provisions.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
National Grid Electricity Transmission Plc				
NGET-01	National Grid Electricity Transmission Plc	Protective Provisions	Plot 21-032 covers the operational compound at Monk Fryston substation, no rights are sought over this area, but it's included for the benefit of Work No. 4 (works to the National Grid substation to facilitate connection of the authorised development to the National Grid including population of the substation bay). The proposed Order Limits overlap with land required for the siting of future NGET infrastructure. It should be noted that Plots 21-031 of the land plans includes the land required for the Monk Fryston Substation extension (part of the Yorkshire GREEN Project). The Applicant is seeking permanent rights over this area. It is NGETs view that this land will become operational and therefore should be treated the same as plot 21-032.	The Applicant notes this comment and acknowledges that the majority of this plot will become operational when the Monk Fryston substation extension is completed but currently understands that plot 21-031 is greater than the future operational area. On this basis, rights across the non-operational areas will be required. The Applicant is engaging with NGET on this point and is confident agreement can be reached before the end of Examination.
NGET-02	National Grid Electricity Transmission Plc	Lands/CPO	NGET requests the Applicant to review plots 20-001, 20-002 and 20-003 where permanent rights are sought for (Works No.5) the proposed cable route and access at CA41 (Rawfield Lane) as this directly conflicts with the landscape mitigation required as part of the Yorkshire GREEN project.	The Applicant notes this comment and can confirm it has reviewed the proposed landscape mitigation works. The Applicant is confident that there is a solution that does not conflict with the landscape mitigation but at this stage requires flexibility until the connection is designed. The Applicant is engaging with NGET on this point The details of the permanent and temporary rights to be acquired are set out in the **Book of Reference [APP-022]**.
NGET-03	National Grid Electricity Transmission Plc	Protective Provisions	As a responsible statutory undertaker, NGET's primary concern is to meet its statutory obligations and to ensure that any development does not adversely affect those statutory obligations. NGET has a duty to protect its position in relation to apparatus and land which is within or in close proximity to the draft Order Limits. Additionally, NGET must protect its ability to deliver, operate and maintain its future proposed infrastructure. NGET will therefore require appropriate protection for retained or proposed infrastructure, including compliance with relevant standards for works proposed within close proximity of its apparatus or proposed apparatus. NGET's rights of access to inspect, maintain, renew and repair such apparatus must be maintained at all times and access to inspect and maintain such apparatus must not be restricted. Further, where the Applicant intends to acquire land or rights, or interfere with any of NGET's interests in land or NGET's apparatus, NGET will require appropriate protection. Further discussion and agreement with the Applicant is required in relation to the impact on its apparatus and rights.	The Applicant has included Protective Provisions for NGET's benefit in the **Draft Development Consent Order (DCO) [APP-017]** to ensure that NGET's interests and apparatus are protected. The Applicant will further negotiate bespoke protections and any commercial agreement necessary with NGET.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
NGET-04	National Grid Electricity Transmission Plc	Protective Provisions	Existing InfrastructureSubstation• MONK FRYSTON 275 kV Substation• MONK FRYSTON 400 kV Substation• Associated overhead and underground apparatus including cablesOverhead Lines• 4YS 400 kV OHL EGGBOROUGH - MONK FRYSTON 1EGGBOROUGH - MONK FRYSTON 2• 4ZT 400 kV OHL FERRYBRIDGE 'C' - FERRYBRIDGE 'B' - MONK FRYSTONFERRYBRIDGE 'C' - MONK FRYSTON• 4ZS 400 kV OHL FERRYBRIDGE 'C' - FERRYBRIDGE 'B' - SKELTON GRANGE 1FERRYBRIDGE 'C' - SKELTON GRANGE 2• 4ZZ 400 kV OHL MONK FRYSTON - PADIHAMBRADFORD WEST - MONK FRYSTON• XK 275 kV OHL FERRYBRIDGE 'C' - FERRYBRIDGE 'B' - SKELTONGRANGE 1FERRYBRIDGE 'C' - FERRYBRIDGE 'B' - SKELTONGRANGE 2• XC 275 kV OHL MONK FRYSTON - POPPLETON 1MONK FRYSTON - POPPLETON 2	The Applicant is aware of NGET's existing assets which require protection and notes this comment.
NGET-05	National Grid Electricity Transmission Plc	Protective Provisions	The extension of Monk Fryston Substation: the Yorkshire GREEN Project includes the construction of a new 400 kV substation on land to the immediate north and east of the existing substation. We highlight that the developer review the indicative proposals for this as it will set out the location of potential future connection points to the east of the existing substation if a 400 kV connection was preferred. It is noted that the Applicant has indicated a preference for the development to be located within the Northeast of the existing substation, which may be in conflict to new installed infrastructure surrounding the existing substation. Much of the documents can be found on the Planning Inspectorate website (Reference EN020024) but we would recommend that the following plans are reviewed:§ Volume 2: Document 2.15(C) Design Drawings – Final Issue C§ Volume 2: Document 2.6.1 (B) Works Plan Section A to F	The Applicant notes this comment and can confirm it is aware of NGET's new 400kV substation. The Applicant has secured a connection to the existing 275kV substation and NGET is aware of the need for the Applicant's cable to cross the new 400kV substation; this has previously been discussed with NGET. The Applicant will continue to engage with NGET on this point.
NGET-06	National Grid Electricity Transmission Plc	Landscape and Visual	Landscape Mitigation: The project is currently well into construction and final detailed plans are being prepared to discharge our DCO requirements in relation to landscape and biodiversity mitigation. A number of permanent bunds are located to the north, east and south of the new substation that will be planted to ensure there is no net loss of biodiversity as a result of the development. We would recommend that the detailed plans submitted specifically to discharge Stage 3 of the Project are reviewed as this will directly impact the proposed access at CA41 (Rawfield Lane). These documents set out the likely proposals for the Landscaping works that will be maintained by National	The Applicant makes note of this comment and will further review the plans submitted to discharge Stage 3 of the Project as suggested and engage with NGET on this point.

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			Grid following completion of the project. These were submitted and approved in late 2024 and can be found on the North Yorkshire Council public access website under application ZG2024/1186/DORYG.	
NGET-07	National Grid Electricity Transmission Plc	Transport and access	Rawfield Lane: Rawfield Lane continues to be used by the existing substation for operation and is being used by the Yorkshire GREEN project for construction. A new, wider access is being delivered by the Project off Rawfield Lane into the substation. A review of the plans may provide some further information in relation to your planned access to your proposed work site.	The Applicant makes note of this comment. The Applicant is proposing access outside of the sub-station operational area for the purposes of laying the Grid Connection cable. The Applicant will discuss this point further with NGET as necessary.
NGET-08	National Grid Electricity Transmission Plc	Protective Provisions	Interface with new OHL Tower: Part of the area highlighted in the target consultation is identified for access along Rawfield Lane. This area would include a part of land within the permanent easement of the Monk Fryston Substation and may potentially interface with a new permanent soil bund and a new OHL Tower (known as XC526) feeding the substation. The plans should be reviewed to ensure there is no conflict with this new tower.It is essential that NGET ensures adequate projection for its future projects both in terms of protection for future assets and future land and rights for the delivery of these projects. Overarching National Policy Statement (NPS) for Energy EN-1 states that "[t]o support the achievement of the transition to net zero, government is accelerating the co-ordination of the development of the grid network to facilitate the UK's net zero energy generation development" (para 4.11.3). Further, in line with the Energy NPS (EN-5) applicants should demonstrate how '"2.14.2 the construction planning for the proposals has been co-ordinated with that for other similar projects in the area on a similar timeline;". NGET are committed to co-operating and co-ordinating.	The Applicant notes comment and can confirm it has considered NGET's new OHL tower. The Applicant is confident that there is a solution that does not conflict with NGET's works (bund and OHL tower) but requires flexibility until the connection is designed. The Applicant is engaging with NGET on this point The Applicant has included Protective Provisions for NGET's benefit in the **Draft Development Consent Order (DCO) [APP-017]** to ensure that NGET's interests and apparatus are protected. The Applicant with review the NGET Protective Provisions which are to be provided with NGET's Written Representation and will continue to negotiate bespoke Protective Provisions and any commercial agreement necessary with NGET.
NGET-09	National Grid Electricity Transmission Plc	Protective Provisions	NGET requires robust Protective Provisions to be included within the draft Development Consent Order (the "Order") for the Project. These provisions must ensure that all NGET assets, both existing and any anticipated future assets, are adequately protected and that all works comply with relevant safety standards. There is clear precedent for the protection of future assets within DCOs, including the Protective Provisions secured by NGET in the Awel Y Mor and Mona DCO and those agreed with the undertaker in relation to the Outer Dowsing Offshore Wind DCO, which is awaiting the Secretary of State's decision.NGET is liaising with the Applicant in relation to such Protective Provisions. Accordingly, NGET has not appended the version of	The Applicant has included Protective Provisions for NGET's benefit in the **Draft Development Consent Order (DCO) [APP-017]** to ensure that NGET's interests and apparatus are protected. The Applicant will review the NGET Protective Provisions which are to be provided with NGET's Written Representation, and will continue to negotiate bespoke Protective Provisions and any commercial agreement necessary with NGET.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
			the Protective Provisions it requires to be included in the Order to this Relevant Representation. However, NGET will submit these at Written Representation Stage, and if not agreed between the parties by that point, an explanation of any outstanding issues.NGET requires ongoing engagement from the Applicant to agree how the Project works will protect NGET's proposed assets and facilitate all future access, land, and other rights necessary for NGET to deliver its statutory functions. NGET will continue to liaise with the Applicant in this regard with a view to concluding matters as soon as possible during the DCO Examination and will keep the Examining Authority updated in relation to these discussions.	
NGET-10	National Grid Electricity Transmission Plc	Protective Provisions	Where the Applicant seeks powers of compulsory acquisition over NGET land, or land in which NGET holds rights or apparatus, the Protective Provisions must require the Applicant to obtain NGET's prior written consent to the exercise of such powers. This protection is critical not only for existing assets but also for land and rights required for NGET's future infrastructure to ensure NGET is not impeded in the delivery of its statutory functions. NGET reserves the right to make further representations as part of the Examination process in relation to specific interactions with any NGET projects identified during the Examination process, and as negotiations continue, but in the meantime will continue to liaise with the Project with a view to reaching a satisfactory agreement during the Examination process and will keep the Examining Authority updated in relation to these discussions.	The Applicant has included Protective Provisions for NGET's benefit in the **Draft Development Consent Order (DCO) [APP-017],** which provide that the Applicant must not acquire or take temporary possession of NGET's rights or interests other than by agreement. The Applicant with review the NGET Protective Provisions which are to be provided with NGET's Written Representation and will continue to negotiate bespoke Protective Provisions and any commercial agreement necessary with NGET.
Forestry Commission				
FC-01	Forestry Commission	Arboriculture	The Forestry Commission has an interest in this application to ensure that woodland and habitat proposals are deliverable, sustainable, and aligned with current policy and best practice.We have previously provided comments and will wish to remain engaged throughout the Examination, particularly in relation to woodland establishment, soils, and long-term management of trees and woodland habitats.We welcome the opportunity to review further details as they are submitted and to contribute to discussions on these matters during the Examination.	The Applicant notes this comment.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
Historic England				
HE-01	Historic England	Cultural Heritage	The main issues for ourselves would be to ensure that the significance of designated heritage assets, including the contribution of setting, and the potential for impact upon this significance is sufficiently assessed through the course of the DCO.	**ES Volume 1, Chapter 8: Cultural Heritage [APP-046]** and **ES Volume 3, Appendix 8.5: 'Statements of significance and impact assessments' [APP-165]** set out the assessment of significance of impacts on designated heritage asserts including the contribution of setting. Section 8.5 sets out the methodology for the assessment and demonstrates alignment with the NPPF/NPS.
HE-02	Historic England	Cultural Heritage	Historic England provided pre-application advice and at PEIR stage. At this stage we flagged concerns and suggestions for how significance, including the contribution of setting, and impact should be articulated at examination stage. Similarly we acknowledged that detailed plans may not be fully drawn up until acceptance - therefore we would like to have the opportunity to provide further advice on these matters pertaining the historic environment which we have already begun providing advice for.	**ES Volume 1, Chapter 8: Cultural Heritage [APP-046]**, Table 8-7 sets out how the ES has responded to previous comments from Historic England on the assessment of significance and contribution of setting. It notes that the significance of all heritage assets with the potential to be impacted by the Proposed Development has been assessed, through a consideration of their heritage interests (in line with those outlined in the NPPF/NPS), and then assigned an environmental value, which aligns with their cultural significance (value). Where appropriate an assessment or signpost of the level of 'harm', as per NPPF, has been added for clarity. Section 8.5 sets out the methodology for the assessment. The Applicant notes HE's comments on continuing to provide advice.
SSE Hydrogen Developments Ltd				
SSEH-01	SSE Hydrogen Developments Ltd	Protective Provisions	SSE is preparing a DCO application for a new low-carbon power station (Ferrybridge Next Generation Power Station ('Ferrybridge')) at the former Ferrybridge C Power Station Site, Kirkhaw Lane, Ferrybridge. The Proposed Development includes a c.10km gas pipeline corridor that will extend eastwards to a proposed AGI on the gas transmission system (Feeder 29), near Gateforth. A site location plan and proximity to Feeder 29 are included in Appendix 1. The application is at the pre-application stage, with submission anticipated in September 2026 (EN0110011).SSE's proposed pipeline corridor(s) currently overlap the draft Order Limits of the Project, as shown on the plan in Appendix 1. SSE wishes to protect its position regarding the future development of Ferrybridge by securing co-location rights for the construction of a gas pipeline across the Project's development area known as 'Site 4'.	The Applicant is aware of SSE's Proposed Development, and the parties are negotiating suitable protections that appropriately protect both projects.
SSEH-02	SSE Hydrogen Developments Ltd	Protective Provisions	To date, no formal agreement has been reached between the Applicant and SSE on co-location rights for the pipeline. SSE has requested a Statement of Common Ground, and negotiations with the Applicant on Protective Provisions are ongoing. We note that there is no reference to co-location with Ferrybridge in	The **Draft Development Consent Order (DCO) [APP-017]** submitted at application did not include Protective Provisions for SSE because the parties were discussing how best to manage the interface and the appropriate form of negotiated settlement, given SSE's Proposed Development is at the pre-application stage.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
			the Applicant's draft DCO, which appears to be an omission.	The Applicant does not consider a SoCG is necessary in circumstances where negotiations are progressing positively and where all matters will be able to be agreed pursuant to commercial negotiations. The Applicant is confident that the parties will agree Protective Provisions before the end of Examination.
SSEH-03	SSE Hydrogen Developments Ltd	Protective Provisions	In principle, SSE supports the Project. However, SSE objects to the Project unless the matters raised in this representation are satisfactorily resolved during the Examination period.	Negotiations are progressing positively and the Applicant is confident that the parties will agree a settled position before the end of Examination.
SSEH-04	SSE Hydrogen Developments Ltd	Protective Provisions	A statutory consultation for Ferrybridge took place between September and October 2025. The consultation materials are available on SSE's website.The preliminary environmental information report (PEIR) presented two potential gas pipeline connection corridors, identified as the 'northern' and 'southern' corridors, which were under consideration against technical, engineering and environmental criteria. The proposed pipeline corridors were initially selected based on work previously conducted for Ferrybridge D CCGT pipeline corridor selection in 2018, prior to the Project's existence.The northern pipeline corridor extends from Ferrybridge to Gateforth, via the north of Birkin. This now overlaps with Site 4 of the Project, shown to be designated for the construction of solar panels. The southern pipeline runs from Ferrybridge to Gateforth, via the south of Birkin, close to the northern bank of the River Aire. It now overlaps with a smaller area of Site 4, which the Project has designated for landscaping.	The Applicant notes this and understands (has progressed the design of the Proposed Development cognisant of) the potential interface between the two projects.
SSEH-05	SSE Hydrogen Developments Ltd	Protective Provisions	In seeking to connect to Feeder 29, which arcs southeast to northwest to the east of Gateforth, Ferrybridge has a relatively narrow corridor within which to make the gas pipeline connection. The Project's Site 4 establishes a potentially significant infrastructure barrier to access Feeder 29 in its current form, by nature of both the proposed location and the significant scale of the Project. Following consultation and completion of ongoing assessments, SSE has identified the northern corridor as the preferred pipeline route, due to several constraints along the southern pipeline corridor. The northern pipeline corridor avoids more constraints within the area, including local settlements, heritage assets, significant flood-zone 3a and 3b areas and other existing and proposed infrastructure. SSE will therefore need to seek rights to construct and maintain a pipeline through Site 4, through its future DCO. It is SSE's preference that the Applicant recognises the Ferrybridge project and gas pipeline	Whilst the importance of SSE's proposed development is recognised, the Proposed Development is a critical national priority project, and so appropriate protections need to be in place for both parties. As such the parties are negotiating suitable protections that appropriately protect both projects.

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			corridor during their own DCO determination, to plan proactively for co-location at an early stage of development.	
SSEH-06	SSE Hydrogen Developments Ltd	Protective Provisions	The Benefits of Co-LocationThese projects are both nationally significant infrastructure projects, affecting some of the same local communities around the Project's Site 4. SSE recognises the importance of coordinating efforts to minimise disruption and, where possible, avoid confusion.SSE is committed to working collaboratively with the Applicant to ensure a solution that enables the co-existence of both projects. SSE have authored a draft report detailing the interrelationships between the two projects and the approach to collaboration to date. SSE has shared this with the Applicant, for their input, with a view to completing and submitting it with the Ferrybridge DCO application.Co-locating two national infrastructure developments is considered to have numerous benefits, including:Reducing impacts on the local community through construction disruption, by coordinating construction activities where possible and required.Reducing loss of overall usable agricultural land;Potential to share environmental mitigation and maximise cross-project benefits; andProviding clarity for stakeholders, particularly local authorities, when discharging requirements and in construction delivery.SSE believes this would support overall good design across both developments and therefore welcomes joint working with the Applicant on these matters to demonstrate best practice within the energy industry.	The Applicant understands the need for strong communication with SSE and recognises that collaboration is in the interests of both parties. The Applicant agrees this is important for the delivery of critical national infrastructure. The Applicant confirms that negotiations are progressing positively with SSE and the Applicant is confident that the parties will agree a settled position before the end of examination.
SSEH-07	SSE Hydrogen Developments Ltd	Protective Provisions	National Policy EN1 identifies the need for, "a diverse mix of gas supply infrastructure including pipelines, storage and reception facilities in order to meet our energy objectives". It goes on to say, "Where low carbon alternatives can replace unabated gas, we will still need new gas infrastructure".The policy statement also identifies, "an urgent need for all types of low carbon hydrogen infrastructure to allow hydrogen to play its role in the transition to net zero with the potential to help decarbonise vital UK industry sectors and provide flexible deployment across heat, power and transport".Hydrogen UK's 'Hydrogen to Power' report identifies that the government must support Hydrogen to Power at scale, to "achieve the 2030 clean power system and lay the foundations for a clean, resilient and secure power system beyond 2030".The report identifies that, "whilst renewable sources of electricity such as wind and solar are crucial in	The Applicant understands the need for strong communication with SSE and recognises that collaboration is in the interests of both parties. The Applicant agrees this is important for the delivery of critical national infrastructure. The Applicant confirms that negotiations are progressing positively with SSE and the Applicant is confident that the parties will agree a settled position before the end of examination.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
			achieving net zero, they are also inherently intermittent". "Storage technologies such as batteries will play a role, with dispatchable generation also needed to address the larger and/or longer durations of supply deficit that will exist in the renewables-dominated power system of the future".To deliver these policy commitments, both projects should collaborate so that neither is compromised in their ability to deliver critical infrastructure. SSE believes that co-location can be achieved, and would demonstrate how good design practice, as advocated for in EN-1, has been implemented to ensure both projects are efficient in their use of natural resources, including agricultural land.	
SSEH-08	SSE Hydrogen Developments Ltd	Protective Provisions	SSE has proactively engaged with the Applicant since early 2025. SSE has been transparent with the Applicant regarding the optioneering work undertaken and the preference for the northern pipeline corridor. SSE shared a more detailed pipeline routing with the Applicant for the northern pipeline corridor through the Project's development area. Feedback from the Applicant on this led to SSE making changes, including: Focusing co-location on non-operational elements, such as permissive paths, and Utilising existing access roads for construction to limit interaction with planned solar panel development. Prior to the submission of the Project's DCO application, SSE provided the Applicant with a revised pipeline routing, with a reduced corridor width, demonstrating how the pipeline would cross the Project, as shown on the plan in Appendix 2. It is proposed that the pipeline would utilise corridors through Site 4, which the Project could develop as permissive paths.	The Applicant appreciates SSE's engagement and proactivity to enable the parties to manage the inter-relationship between the two proposed developments.
SSEH-09	SSE Hydrogen Developments Ltd	Protective Provisions	SSE is currently seeking Protective Provisions from the Applicant to ensure that the ability to connect to the gas transmission system via Feeder 29 through its northern pipeline corridor is unaffected by the powers set out in the draft Order for the Project.SSE provided the Applicant with draft Protective Provisions prior to the submission of their DCO application. These are currently being negotiated, and SSE would like to see these included within the Project's DCO. SSE also considers that a Statement of Common Ground should be prepared with SSE.	The Applicant confirms that negotiations are progressing positively with SSE and the Applicant is confident that the parties will agree a settled position before the end of examination. The Applicant does not consider a SoCG is necessary in circumstances where negotiations are progressing positively and where all matters will be able to be agreed pursuant to commercial negotiations. The Applicant is confident that the parties will agree Protective Provisions before the end of examination.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
Northern Powergrid (Yorkshire) PLC and (North East) PLC				
NPG-01	Northern Powergrid (Yorkshire) PLC and (North East) PLC	Protective Provisions	Northern Powergrid is in principle supportive of the above project but has concerns regarding the impacts that the proposed project will have on its existing assets/infrastructure, their pending improvement works and their land interests. These are located within close proximity to the proposed limits of the Proposed Development's boundaries. Areas shown within the Proposed Development boundary have a direct impact on Northern Powergrid's existing critical national infrastructure which serve significant numbers of customers in the local and wider area, and the rights for these assets are essential in maintaining an uninterrupted power supply to the customers they serve. Northern Powergrid has a statutory duty to provide its customers with an uninterrupted supply of electricity and thus rightly raises concerns to any Proposed Development that would result in a breach to its duty.	The Applicant is negotiating Protective Provisions and a legal agreement with Northern Powergrid to ensure that Northern Powergrid's interests and apparatus are protected. Negotiations are progressing positively and the Applicant is confident that the parties will agree matters before the end of examination.
NPG-02	Northern Powergrid (Yorkshire) PLC and (North East) PLC	Protective Provisions	In particular, the Proposed Development seeks to interfere with Northern Powergrid's existing apparatus, access to such apparatus and servicing rights which are vital for Northern Powergrid's existing operations. Northern Powergrid therefore reserve the right to review the position as the Proposed Development progresses and protect its existing apparatus including with bespoke protective provisions in the Order, as at this stage, the specific details of the project's infrastructure including the depth, diameter and respective easement strips are unknown. Northern Powergrid's existing apparatus may need to be diverted to accommodate the project and therefore Northern Powergrid requires bespoke protective provisions to protect its position and recover the costs of any required diversions, alternative apparatus or relocations. Northern Powergrid also has concerns over the currently proposed protective provisions contained within the draft Order as they do not take into account site specific issues and do not accord with Northern Powergrid's standard protective provision requirements.	The Applicant is negotiating Protective Provisions and a legal agreement with Northern Powergrid to ensure that Northern Powergrid's interests and apparatus are protected. The Applicant will update its **Draft Development Consent Order (DCO) [APP-017]** to include Protective Provisions with Northern Powergrid once they are agreed.
NPG-03	Northern Powergrid (Yorkshire) PLC	Protective Provisions	The compulsory purchase powers incorporated into the Order seeks to acquire land and interests which, if acquired, would adversely affect Northern Powergrid's ability to use, access, maintain and where necessary	The Applicant agrees that any exercise of compulsory acquisition powers is as a last resort and will always seek voluntary agreement first.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
	and (North East) PLC		upgrade its equipment. It is not necessary to acquire these interests where an agreement between the parties would be more appropriate.	The Applicant is negotiating Protective Provisions and a legal agreement with Northern Powergrid to ensure that Northern Powergrid's interests and apparatus are protected.
NPG-04	Northern Powergrid (Yorkshire) PLC and (North East) PLC	Protective Provisions	Northern Powergrid is liaising with Light Valley Solar Limited ('the Applicant') in relation to the protective provisions it requires to be included in the Order with a view to concluding matters as soon as possible during the Order's Examination process and shall keep with Exanimating Authority updated in relation to these discussions. Northern Powergrid does reserves the right to make further representations as part of the Examination process but in the meantime will continue to liaise with the Applicant with a view to reaching an agreed position.	The Applicant considers negotiations are progressing positively and is confident that the parties will agree matters before the end of examination.
Canal & River Trust				
CRT-01	Canal & River Trust	Protective Provisions	There are a number of provisions within the draft DCO which could impact the Trust as Navigation Authority for the River Ouse. The Trust has been in discussion with the Applicant and their legal representatives upon the content of the order.	The Applicant notes this comment.
CRT-02	Canal & River Trust	Protective Provisions	No Protective Provisions have been included in the submitted Development Consent Order [APP-017]. Due to the interaction of the works with our network, where drilling below the River Ouse is proposed, we consider that these are required in order to ensure that the works do not adversely affect the Trust's ability to carry out our statutory function. The Applicant accepts the principle of protective provisions for the Trust and the wording of the protective provisions have recently been agreed. We understand the Applicant will be including the agreed protective provisions in the draft DCO when the draft DCO is next updated.	The Applicant confirms that the parties have agreed Protective Provisions. The Applicant will update its **Draft Development Consent Order (DCO) [APP-017]** to include the Protective Provisions by Deadline 1.
CRT-03	Canal & River Trust	Protective Provisions	Article 6 and Schedule 3 the DCO would disapply legislation in so far as it relates to the construction, operation, maintenance or decommissioning of the authorised development and are incompatible with the powers contained in the DCO. This includes, under article 6(f) and (g) respectively the Aire and Calder Navigation Act 1889 and Aire and Calder Navigation Act 1899. These acts are some of the 'enabling acts' that the Trust relies on as navigation authority and to fulfil its statutory duty to maintain the waterway for commercial use. To avoid any unintended consequences, we propose additional text within Article 6 (1)(f) to state that the "legislation listed in Schedule 3 (legislation to be disapplied) in so far as the provisions still in force	The Applicant will make this change in the next iteration of the DCO.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
			are incompatible with the powers contained within this Order and do not impact on the operation or maintenance of the River Ouse as a navigable river". This would be consistent with approaches used at the Gate Burton Energy Park (EN010131) and East Yorkshire Solar (EN10143) projects. We have recently raised this matter with the Applicant, they have agreed the amendment and we understand that the amendment will be reflected in the DCO, when it is next updated.	
CRT-04	Canal & River Trust	Construction and decommissioning	It is essential that Horizontal Directional Drilling works are appropriately designed to limit the potential for any harm or damage to the River Ouse. We note that Section 2.5 of the Outline Construction Environmental Management Plan (oCEMP) [APP-192] highlights that an HDD Method Statement will be provided alongside the final CEMP. We request that any activities utilise an appropriate buffer between the banks of the River Ouse and the send and receive pits and that drilling is undertaken a minimum of 5m beneath the bed of the river.	The Applicant notes this comment. At this stage of the Proposed Development the location of the send and receive pits as well as drilling is subject to the detailed design stage. As outlined within **ES Volume 3, Appendix 1.3: Commitments Register [APP-145]** offsets have been embedded into the design, including a minimum offset of 10 m from bank top for all watercourses (50 m for Canal and River Trust watercourses, e.g. River Ouse) and their associated riparian zones. An HDD method statement will be produced and confirm these details for the construction alongside the detailed CEMP. The requested buffers will be noted and taken into consideration. In regard to a 5 m burial depth of cable, the Applicant is committed to avoiding impacts but there needs to be some degree of flexibility to reflect the latest thinking on mitigation at the time of construction which still ensure that there are no significant effects. To cater for this flexibility, the **Outline Construction Environmental Management Plan (oCEMP) [APP-192]** will be updated no later than Deadline 1 to provide that the detailed CEMP will need to set out the EMF mitigation measures that have been deployed (including the depth of cabling) across the Proposed Development and explain how that has taken account of the latest research and practice on this matter. The detailed CEMP will be written in consultation with the Environment Agency and Natural England. The **Design Parameters and Commitments document [APP-217]** will be updated no later than Deadline 1 to take account of the above, noting that such flexibility could, but does not have to, include measures such as protective covers and 5m+ depths but would take account of the latest research and practice on this matter. The Applicant welcomes ongoing engagement to inform the parameters of the detailed CEMP and Method Statement to ensure the impacts on the River Ouse are mitigated.
CRT-05	Canal & River Trust	Construction and decommissioning	Requirement 4 of the draft DCO provides that Work No. 5 must be carried out in accordance the design parameters and commitments document [APP-217]. The document describes HDD works but does not specify the depth of the works or location of the send and receive pits. It would be useful if this was amended	The details of the HDD design including depths of the works and location of the send pits are subject to the details of the final design. To cater for this flexibility, the **Design Parameters and Commitments document [APP-217]** will be updated no later than Deadline 1 to include measures such as protective covers and 5m+ depths but would take account of the latest

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
			to specify more precise parameters necessary to ensure that the River Ouse is adequately protected. We would be happy to discuss specifications relating to HDD beneath the river with the Applicant.	research and practice on this matter to ensure there are no significant effects on fish. As outlined within **ES Volume 3, Appendix 1.3: Commitments Register [APP-145]** offsets have been embedded into the design, including a minimum offset of 10 m from bank top for all watercourses (50 m for Canal and River Trust watercourses, e.g. River Ouse) and their associated riparian zones. An Illustrative example of a 25 m x 25 m launch pit working area and layout for a 275 kV connection is included with **ES Volume 3, Appendix 2.1: Cable Route Method Statement [APP-147]**. However, the details would be confirmed at the detailed design stage and captured within the detailed Construction Environmental Management Plan (CEMP) (and associated HDD Method Statement) secured under Requirement 12. Any works relating to HDD activities will be undertaken in line with a Method Statement, a commitment set out in the **Outline Construction Environmental Management Plan (oCEMP) [APP-192]**. Strict adherence to the Method Statement will be required when undertaking HDD with any changes requiring approval from the Contractors Project Manager and documented risk assessments.The Applicant welcomes ongoing engagement to inform the parameters of the detailed CEMP and Method Statement to ensure the impacts on the River Ouse are mitigated.
National Gas Transmission PLC				
NGST-01	National Gas Transmission PLC	Protective Provisions	NGT will require appropriate protection for retained apparatus, including compliance with relevant standards for works proposed within close proximity to its apparatus. NGT's rights of access to inspect, maintain, renew and repair such apparatus must also be maintained at all times, and must not be restricted. Further, where the Applicant intends to acquire land or rights, or interfere with any of NGT's interests in land or NGT's apparatus, NGT will require appropriate protection and further discussion is required in that regard.	The Applicant has included Protective Provisions for NGT's benefit in the **Draft Development Consent Order (DCO) [APP-017]** to ensure that NGT's interests and apparatus are protected. The Applicant will continue to negotiate bespoke protections and any commercial agreement necessary with NGT.
NGST-02	National Gas Transmission PLC	Protective Provisions	NGT has the following apparatus located within and in close proximity to the proposed Order Limits: Feeder Main – FM07 (Cawood to Susworth T West) (plots: 05-048, 05-049, 06-001, 06-002 and 06-003) Feeder Main – FM29 (Asselby to Pannal) (plots: 11-036, 15-009, 16-003 and 16-004) Associated apparatus, including Cathodic Protection Groundbeds/Transformer Rectifier(s), are also located within and in close proximity to the proposed Order Limits.	The Applicant is aware of NGT's existing assets and notes this comment.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
NGST-03	National Gas Transmission PLC	Protective Provisions	The route of the above-mentioned Feeder Mains is shown by the blue lines on the interaction plan ("Plan") (which will be provided under separate cover to the Planning Inspectorate's email address for the Project given it can't be uploaded via the portal) each of which is labelled to indicate the relevant Feeder Main. The proposed Order Limits are shown outlined in red on the Plan.NGT has the benefit of easements to enable the retention and maintenance of, and access to, the abovementioned Feeder Mains and associated apparatus, including rights to prevent the following activities within the easement strip:erection of permanent and/or temporary buildings/structures;changes to existing ground levels; andstorage of materials.The pipeline easements are indicatively shown by a pink line on the Plan.	The Applicant notes this comment and welcomes the Plan.
NGST-04	National Gas Transmission PLC	Protective Provisions	As a responsible statutory undertaker, NGT's primary concern is to meet its statutory obligations and ensure that any development does not impact in any adverse way upon those statutory obligations. As such, NGT has a duty to protect its position in relation to infrastructure and land which is within or in close proximity to the proposed Order Limits. The above mentioned Feeder Mains and their associated apparatus form an essential part of the gas National Transmission System (NTS). NGT therefore require protective provisions to be included within the draft Order to ensure that the apparatus and associated land interests are adequately protected and that relevant safety standards are complied with during construction and operation of the Project.	The Applicant has included Protective Provisions for NGT's benefit in the **Draft Development Consent Order (DCO) [APP-017]** to ensure that NGT's interests and apparatus are protected. The Applicant will continue to negotiate bespoke protections and any commercial agreement necessary with NGT.
NGST-05	National Gas Transmission PLC	Protective Provisions	NGT's standard form of protective provisions ("Protective Provisions") (which have been provided to the Promoter) have been commercially assessed and deemed necessary in their entirety in order to protect its assets. As such, it is this standard form of Protective Provisions which NGT require to be included on the face of the Order in order to ensure adequate protection.	The Applicant is aware that the Protective Provisions currently in the **Draft Development Consent Order (DCO) [APP-017]** depart from NGT's standard Protective Provisions. The Applicant recognises that NGT's assets require protection and will seek to agree Protective Provisions with NGT. The Applicant has been engaging with NGT about the appropriate form of the Protective Provisions, in the context that Island Green Power, as the parent company to the Applicant, is negotiating Protective Provisions with National Gas Transmission across its NSIP portfolio. Whilst the Applicant recognises that the physical nature of each project's interactions with NGT's assets is separate, the key points of negotiation between the parties will apply to all projects. As such, the Applicant is focussed on seeking to reach completion of negotiation on another project which is further advanced, such that the position

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				there can be 'rolled out' to other projects such as the Proposed Development, so that there is a standard NGT/IGP position. Progress is being made in those other project discussions, and the Applicant is confident that this will enable completion of negotiations for the Proposed Development before the end of Examination.
NGST-06	National Gas Transmission PLC	Protective Provisions	Unfortunately, the Applicant has not attempted to liaise with NGT on the abovementioned Protective Provisions and as such no progress has been made in this regard, despite NGT's attempts to enter into discussions dating back to August 2025. NGT is disappointed that appropriate priority does not appear to have been given to the protection of its assets in connection with the Project.	The Applicant recognises that NGT's assets require protection and will seek to agree Protective Provisions with NGT. The Applicant has been engaging with NGT about the appropriate form of the Protective Provisions, in the context that Island Green Power, as the parent company to the Applicant, is negotiating Protective Provisions with National Gas Transmission across its NSIP portfolio. Whilst the Applicant recognises that the physical nature of each project's interactions with NGT's assets is separate, the key points of negotiation between the parties will apply to all projects. As such, the Applicant is focussed on seeking to reach completion of negotiation on another project which is further advanced, such that the position there can be 'rolled out' to other projects such as the Proposed Development, so that there is a standard NGT/IGP position. Progress is being made in those other project discussions, and the Applicant is confident that this will enable completion of negotiations for the Proposed Development before the end of Examination.
NGST-07	National Gas Transmission PLC	Protective Provisions	Unless and until NGT is satisfied that adequate protections have been secured by way of agreed Protective Provisions, NGT must object to the Order, and participate in the Examination as necessary.	The Applicant notes this comment.
NGST-08	National Gas Transmission PLC	The Proposed Development and DCO Process	As noted, where the Applicant intends to acquire land or rights, or interfere with any of NGT's interests in land, NGT will require further discussion with the Applicant.	The Applicant has included Protective Provisions for NGT's benefit in the **Draft Development Consent Order (DCO) [APP-017]** which provide that the Applicant must not acquire or take temporary possession of NGT's rights or interests other than by agreement (such agreement not to be unreasonably withheld or delayed).
NGST-09	National Gas Transmission PLC	Protective Provisions	NGT 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 attempt to liaise with the Applicant with a view to reaching agreement on the inclusion of Protective Provisions in the Order as soon as possible, and will keep the Examining Authority updated on progress at regular intervals.	The Applicant notes this comment.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
The Coal Authority (trading name The Mining Remediation Authority)				
CAMR-01	The Coal Authority (trading name The Mining Remediation Authority)	Agricultural Land and Soils	We have reviewed the area for the solar panels, cable runs and substations as identified on the Site Location Plan and can confirm there does not appear to be any coal mining related features recorded at surface or shallow depth in these areas. The authors of the EIA Scoping Report, noted that the risk of ground instability due to former coal mining to the Proposed Development was very low and based on our records we consider this conclusion acceptable. We have no additional comments to make.	The Applicant notes this comment
Network Rail Infrastructure Limited				
NRIL-01	Network Rail Infrastructure Limited	Protective Provisions	Network Rail wishes to ensure that the Proposed Development will not have a detrimental impact on the operation of the Railway and that the safety of the Railway is maintained during the construction, operation and ongoing maintenance requirements of the Proposed Development.	The Applicant has included Protective Provisions for NGT's benefit in the **Draft Development Consent Order (DCO) [APP-017]** to ensure that Network Rail's interests and apparatus are protected. The Applicant will continue to negotiate the Protective Provisions with Network Rail. Draft Protective Provisions are currently with Network Rail for review.
NRIL-02	Network Rail Infrastructure Limited	Protective Provisions	As the Promoter proposes to compulsorily acquire new rights over railway land as well in close proximity to railway assets, Network Rail hereby objects to the making of the Order in principle on the ground that the powers sought are likely to interfere with the safe and efficient operation of the Railway and cause a serious detriment to the carrying on of Network Rail's statutory undertaking.	The Applicant has included Protective Provisions for NGT's benefit in the **Draft Development Consent Order (DCO) [APP-017]** to ensure that Network Rail's interests and apparatus are protected. The Applicant will continue to negotiate the Protective Provisions with Network Rail. Draft Protective Provisions are currently with Network Rail for review.
NRIL-03	Network Rail Infrastructure Limited	Protective Provisions	In order for Network Rail to be in a position to withdraw its objection Network Rail will require adequate protective provisions to be included within the Order (and for the avoidance of doubt Network Rail require these Protective Provisions to be in the form set out at Appendix 1 to this Relevant Representation) and an agreement with the Promoter to ensure that the new rights sought are exercised in regulated manner to prevent adverse impacts to the Railway.	The Applicant notes this comment. The Applicant will review the Protective Provisions provided at Appendix 1 as against the draft Protective Provisions that are with Network Rail for review. The Applicant will continue to negotiate the Protective Provisions with Network Rail.
NRIL-04	Network Rail Infrastructure Limited	Protective Provisions	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. The Examining Authority and the Secretary of State will need to be satisfied that railway safety and operations will not be compromised by the making of the Order. Network Rail hereby requests that the Examining Authority treats Network Rail as an Interested Party for the purposes of the Examination and Network Rail reserves the right to produce additional and further grounds of concern when further details of the	The Applicant notes this comment.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
			Proposed Development and its effects on Network Rail's assets are available.	
Health and Safety Executive				
HSE-01	Health and Safety Executive	The Proposed Development and DCO Process	HSE has no further comments to make to previous advice provided on 4th November 2025.	The Applicant notes this comment.
Ouse & Derwent Internal Drainage Board				
IDB-01	Ouse & Derwent Internal Drainage Board	The Proposed Development and DCO Process	Ouse & Derwent Internal Drainage Board (hereinafter referred to as "the Board") will therefore be focussing on Site 1 and the Cable Route Corridor within our district.	The Applicant notes this comment.
IDB-02	Ouse & Derwent Internal Drainage Board	Water Resources and Flood Risk	There are a number of Board maintained watercourses and ordinary watercourses within/surrounding Site 1 and within the proposed Cable Route Corridor. These watercourses are known to be subject to high flows during storm events.	The Applicant notes this comment and has held meetings with the Ouse & Derwent Internal Drainage Board to discuss these watercourses.
IDB-03	Ouse & Derwent Internal Drainage Board	Protective Provisions	The Board notes that Article 6 of the draft Development Consent Order is disapplying sections 23 and 32 of the Land Drainage Act 1991, together with any Byelaws that the Board has made under Section 66 of the Land Drainage Act 1991. Instead, Article 45 states that Schedule 15 (the Protective Provisions) have effect. Part 3 of Schedule 15 is relevant to the Board. With regards to Part 3 of Schedule 15 of the draft Development Consent Order, the Board has already been in discussion with the Applicant and the Board are in agreement with these protective provisions.	The Applicant notes this comment and confirms the Protective Provisions at Part 3 of Schedule 15 of the **Draft Development Consent Order (DCO) [APP-017]** are agreed between the parties.
IDB-04	Ouse & Derwent Internal Drainage Board	Protective Provisions	Article 17 relates to the discharge of surface water. The Board would ask that an additional provision is added to state:"*Where the undertaker discharges water into, or makes any opening into, a watercourse, public sewer or drain belonging to or under the control of a drainage authority (as defined in Part 3 of Schedule 15) the provisions of Part 3 of Schedule 15 shall apply instead*".	The Applicant will amend Article 17 to provide for this in its next iteration of the **Draft Development Consent Order (DCO) [APP-017]**.
IDB-05	Ouse & Derwent Internal Drainage Board	The Proposed Development and DCO Process	The Board would, generally, seek for there to be nothing new constructed within 9 metres of the top of the embankment of the Board maintained watercourses so that the Board's machinery can go alongside the watercourse and carry out maintenance works to the watercourse. In addition, we want to ensure that there is nothing to destabilise the embankments of the watercourses.	**ES Volume 1, Chapter 15: Water Resources and Flood Risk [APP-053]** confirms the Proposed Development includes the commitment to maintain a minimum offset of 10 m from bank top for all IDB managed watercourses from all infrastructure (including fencing but not including planting) and construction works, except in isolated exceptions where watercourse crossings are required. The Applicant is continuing to engage with the Ouse & Derwent Internal Drainage Board on this matter and it has been agreed with the Board that planting can be included within the Proposed Development design on one side of Board maintained watercourses and the Board will confirm which side with the Applicant. Once this has been confirmed by the IDB the Applicant will

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				update the **Design Parameters and Commitments document [APP-217]** accordingly.
IDB-06	Ouse & Derwent Internal Drainage Board	The Proposed Development and DCO Process	For any ordinary watercourses (i.e. ones which the Board do not maintain), the Board would request a minimum of 3 metres from the bank top to be left completely clear of any new buildings, structures, solar panels, fences, walls, planting or hardstanding, to ensure there is sufficient room for maintenance works to the watercourse by the riparian owner in the future.	**ES Volume 1, Chapter 15: Water Resources and Flood Risk [APP-053]** confirms the Proposed Development includes the commitment to maintain a minimum offset of 10 m from bank top for all watercourses from all infrastructure (including fencing but not including planting) and construction works, except in isolated exceptions where watercourse crossings are required. The Applicant is continuing to engage with the Ouse & Derwent Internal Drainage Board on this matter and it has been agreed with the Board that planting can be included within 3m of ordinary watercourses (along one side) ensuring access to the watercourses is maintained for maintenance purposes. The Applicant will update the **Design Parameters and Commitments document [APP-217]** accordingly.
IDB-07	Ouse & Derwent Internal Drainage Board	Water Resources and Flood Risk	The Board notes that the Applicant has committed to a 10m easement from the "bank top of all watercourses and riparian boundaries, except where watercourse crossings are required". This is welcomed.	The Applicant acknowledges this comment
IDB-08	Ouse & Derwent Internal Drainage Board	Water Resources and Flood Risk	"APP-016 - Outline Environmental Masterplan – Figure 12.01 and 12.02" – does not show all the watercourses within the site which are shown on APP-077 (Figure 6.6). However, it appears that the fence line and solar panels are 10 metres away from the bank top of the watercourse – this is very much welcomed.	The Applicant acknowledges this comment and can confirm that all of the fence lines and solar panels are 10 metres away from the bank top of watercourses. The **Outline Environmental Masterplans (OEM) [PDA-003 to PDA-010]** is an indicative layout and subject to change during detailed design. However, the Applicant confirms that all watercourses have been assessed in **ES Volume 1, Chapter 15: Water Resources and Flood Risk [APP-053]**.
IDB-09	Ouse & Derwent Internal Drainage Board	Water Resources and Flood Risk	The Board has reviewed "APP-195 - Outline Landscape and Ecological Management Plan" and note that grassland is mostly proposed within the 10m easement. However, there are some trees and hedging and planting within the 10m buffer - this is not agreed with the Board as this could restrict access for maintenance works to the watercourses. Please can the Applicant review this aspect.	The Applicant has agreed within a meeting with Ouse and Derwent IDB that the Board will review the affected IDB watercourses and will produce a plan to show exactly which side the Board work from and the Board has requested no new planting or infilling on the side they work from. On the side the Board do not work from, the Board are happy for the Proposed Development to infill/plant new trees in the easement zone.
IDB-10	Ouse & Derwent Internal Drainage Board	Water Resources and Flood Risk	The Board has reviewed "APP-182 – Outline Drainage Strategy". The Board has no objection to the principle of the approach noted within the below sections of the Outline Drainage Strategy: Section 5.3 – Solar PV areas Section 5.4 - Battery Energy Storage Systems Section 5.5 - Substations and transformers	The Applicant notes this comment
IDB-11	Ouse & Derwent Internal Drainage Board	Water Resources and Flood Risk	In terms of Section 5.6 (Access Tracks), we note that these are proposed to be fully permeable for the "internal access tracks" and what appears to be an impermeable solution for the other access tracks. For the avoidance of any doubt, the Board views Type 3 (with a 30% voids ratio) as "permeable" and not requiring a drainage strategy. If the Applicant installs Type 1 materials or other impermeable materials, the	The Applicant notes this comment. As set out in the **Outline Drainage Strategy (ODS) [APP-182]** the choice of road and hardstanding surfaces will balance the benefits of permeability and infiltration with the need for flood resilience and long-term durability. In areas where high flows or overtopping are possible, more robust or reinforced surfaces may be required, while maintaining permeability where feasible. There is a commitment to prepare a detailed Drainage Strategy within the

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
			Board will view this as "impermeable" and requiring a drainage strategy. We want confirmation from the Applicant that for the impermeable access tracks, a formal drainage strategy will be put in place.	**Draft Development Consent Order (DCO) [APP-017]** for the detailed design and will consider the permeability of the access tracks to be installed. Any access tracks constructed with Type 1 materials or similar will be treated as impermeable and a suitable drainage strategy will be developed and put in place to manage runoff from these areas in accordance with the parameters outlined in the **Outline Drainage Strategy (ODS) [APP-182]** including discharge restrictions and attenuation requirements.
IDB-12	Ouse & Derwent Internal Drainage Board	Water Resources and Flood Risk	For Section 5.7 (Temporary Works), the Board may require a drainage strategy to be put in place for some of the temporary works given the length of time of the project. Please can the Applicant confirm this is understood and agreed.	The Applicant notes this comment and it is understood and agreed that this may be required at detailed design stage. Further, the Applicant has agreed Protective Provisions for the Board which are set out in Part 3 of Schedule 15 within the **Draft Development Consent Order (DCO) [APP-017]** which would facilitate this if it was required.
IDB-13	Ouse & Derwent Internal Drainage Board	Water Resources and Flood Risk	If the Applicant is proposing to insert a cable under a watercourse within the Board's district, the Board's prior written consent must be obtained. We would prefer for any cables crossing watercourses to be laid above any existing culverts so that they do not affect water flows and do not therefore require the Board's consent in terms of the cables themselves. If this is not feasible, directional drilling must be used. The Board will not, generally, accept open cut crossings.	The Applicant notes this comment. The **Design Parameters and Commitments document [APP-217]** commits to trenchless crossing solutions being used for IDB watercourses and this was agreed with the Board during a meeting held on 23 August 2025. Further, the Applicant has agreed Protective Provisions for the Board which are set out in Part 3 of Schedule 15 within the **Draft Development Consent Order (DCO) [APP-017]**.
HD777FRY Limited				
HD7-01	HD777FRY Limited	Lands/CPO	The boundaries of the Proposed Development include a battery energy storage system directly to the south of the national grid electrical substation at Monk Fryston, owned by a company called HD777FRY Limited, which in turn is owned by Constantine Energy Storage LLP (an investment vehicle majority owned by two large pension funds). This is a £60m project that was recently completed and located on National Grid land (leased to the BESS owner for 40 years). There has been no approach by the Light Valley Solar to the owner of the BESS and the intentions of the land in question are unclear at this stage. We have reached out to Light Valley Solar to understand more about their plans but to date have not yet received a response. Obviously, we would request that works do not impede the operation nor encroach on the existing BESS.	The Applicant notes this comment. Within the **Book of Reference [APP-022]** HD777FRY have been identified as holding interests as a leaseholder in plots 21-033, 21-034, 21-035, and as a rights holder in plots 20-001, 20-002, 21-029, 21-030, 21-031, 21-032, 21-036, 21-040. As such, HD777FRY had been included within the Applicant's diligent inquiry prior to DCO submission and invited to both consultations held by the Applicant throughout pre-application. The Applicant has met with Constantine Energy since this Relevant Representation was submitted. Discussions were positive and the Applicant will continue to engage with Constantine Energy / HD777FRY.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
North Yorkshire Council				
NYC-01	North Yorkshire Council	The Proposed Development and DCO Process	The principle of the development in this location needs to be determined in accordance with National Policy Statements, Emerging National Policy Statements, the NPPF and the Development Plan for the area. The site falls within the Selby area of North Yorkshire Council. The Adopted Development Plan for this area comprises: • The Minerals and Waste Joint Plan (adopted 16 February 2022) – Policies S01, S02, S07, W01, W05 • Selby Core Strategy Local Plan 2013 – Policies SP1, SP2, SP12, SP13, SP15, SP16, SP17, SP18, SP19 • Selby District Local Plan 2005 – Policies ENV1, ENV2, ENV3, ENV4, ENV9, EMV12, ENV13, ENV16, ENV17, ENV27, ENV28, T1, T2, T8, CS6 The Council will set out all relevant policies as they relate to the application in the Local Impact Report. While national and local policies are broadly supportive of renewable energy proposals in principle, the local and environmental impacts of the proposals and any proposed mitigation must be given full and careful consideration	The Applicant makes note of this comment. The Applicant is confident that the proposed management and mitigation measures set out in the **Environmental Statement (ES) [APP-038 to APP-190]** are comprehensive and robust and that the Proposed Development aligns with national and local planning policy; this is outlined in the **Planning Statement [APP-207]** and **Policy Compliance Document [APP-224]**. Section 6: Legislative and Policy Context and Section 7: Planning Assessment, of the **Planning Statement [APP-207]**, set out an appraisal of the Proposed Development against national and local planning policies. Section 3 Local Policy Accordance Tables, of the **Policy Compliance Document [APP-224]**, sets out compliance with relevant Local Plan policies within the: Selby District Core Strategy Local Plan 2011-2027; Selby District Local Plan (2005); North Yorkshire County Council, North York Moors National Park Authority and City of York Council Minerals and Waste Joint Plan; and Escrick Neighbourhood Development Plan 2021-2035. The Planning Statement concludes that the benefits of the Proposed Development, including meeting the identified urgent need, outweigh its limited adverse impacts.
NYC-02	North Yorkshire Council	Cultural Heritage	Heritage Assets - below ground There are currently no issues, and the Council will review the details and supporting archaeological information when it arrives. The Applicant has carried out a proportionate archaeological assessment and made design changes to reduce impact on archaeological features.	The Applicant makes note of this comment.
NYC-03	North Yorkshire Council	Cultural Heritage	Heritage Assets – Above ground. The main concern is the impact of the proposal on the setting of heritage assets. There are ongoing discussions between the Applicant and Council's Conservation Officer on this issue.	The Applicant makes note of this comment. A full assessment of potential impacts on heritage assets has been carried out within **ES Volume 1, Chapter 8: Cultural Heritage [APP-046]**, including a site walkover and a settings assessment. The assessment concludes that there will be no significant adverse effects on Listed Buildings within the Order Limits or wider study area. Some minor adverse effects on setting or glimpsed views of construction activities and/or panels are possible. Where possible, impacts have been mitigated by design. Mitigation includes avoidance of direct physical impacts to designated heritage assets, and landscape planting to reinforce existing hedgerows strengthening the landscape pattern as secured through the **Outline Landscape and Ecological Management Plan (oLEMP) [APP-195]**. This is secured within the **Requirement 6 of the Draft Development Consent Order (DCO) [APP-017]**.
NYC-04	North Yorkshire Council	Landscape and Visual	North Yorkshire Council Landscape have initially reviewed key documents in the Examination Library. There remain concerns regarding the assessment of	A detailed Landscape and Visual Impact Assessment (LVIA) has been undertaken and is reported in **ES Volume 1, Chapter 10: Landscape and**

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
			cumulative effects, the methodology and assessments made, in particular regarding Site 2, the proposed substation location and BESS. These matters are likely to remain areas of focus during the Examination.	**Visual [APP-048]**. Concerns have been raised by NYC regarding the assessment of cumulative effects. Information regarding cumulative effects can be found in **ES Volume 1, Chapter 17: Cumulative and In-Combination Effects [APP-055]**. Table 17-12 provides the broader overall conclusions regarding cumulative and in-combination effects for **ES Chapters 5 to 15 [APP-043 to APP-053]**. In addition, through developing the ES, each topic chapter, where relevant, has included a cumulative impact assessment, considering other committed developments in the area and potential added impacts to aspects such as landscape and visual. It has been assessed that the Proposed Development is likely to lead to some cumulative landscape and visual effects during construction, year 1 of operation and decommissioning stages. These effects represent the change to the landscape and visual experiences that would emerge during any change to the landscape, as recognised through NPS EN-1 which acknowledges in Section 5.10 that "*virtually all nationally significant energy infrastructure projects will impact the landscape*". It should be noted that with proposed mitigation in place and following initial establishment, landscape and visual impacts will generally reduce over time. The Applicant notes the concerns regarding visual impacts of the BESS component. The location of the BESS was determined through an options appraisal and iterative design process, having regard to technical and planning requirements, environmental constraints and potential effects on nearby receptors. The BESS Compound is located at Solar Development Site 2, close to the Solar PV Sites and the on-site substation, which provides operational and efficiency benefits, including minimising transmission losses, maximising storage efficiency, supporting grid balancing, and enabling a rapid and reliable response to network fluctuations. Among the options considered for co-locating the BESS with the Solar PV Sites, Solar Development Site 2 was identified as the least at risk of flooding, most accessible, and least environmentally constrained location for the BESS Compound. The BESS layout was developed to minimise impacts to noise sensitive receptors and noise barriers were introduced within the BESS Compound (refer to **ES Volume 1, Chapter 11: Noise and Vibration [APP-049]** for further details). Access points were identified to enable safe access to the BESS Compound in the event of a fire. The various chapters of the **Environmental Statement (ES) [APP-038 to APP-190]** assess the likely significant effects arising from the BESS at this location and identify mitigation measures where necessary. Overall, the assessment concludes that the siting of the BESS at Solar Development Site 2 presents the lowest potential for significant adverse effects when compared with reasonable alternatives. Further detail on the consideration of alternatives, the design evolution of the Proposed Development and the assessment of potential effects is provided in **ES Volume 1, Chapter 3: Alternatives and**

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				Design Iteration [APP-041], which sets out the iterative process undertaken to identify the preferred location and layout for the Proposed Development, including the BESS Compound, in Section 3.4. As shown on the **Works Plans [AS-004]** and the **Outline Environmental Masterplans (OEM) [PDA-003 to PDA-010]** the BESS site at Site 2 has been located away from residential receptors. It is acknowledged in **ES Volume 1, Chapter 10: Landscape and Visual [APP-048]** that the installation of the BESS at Field 2.4 (as shown on **ES Volume 2, Figure 2.3: Field Numbering Plan [APP-061]**) will result in a noticeable change to the landscape character and a reduction in openness across Site 2. New planting along field boundaries and within setbacks will not yet have established at Year 1 of operation, and the current lack of existing field boundaries means these changes will be visible throughout the site. There is a lack of existing landscape features to soften and mask the proposals and change to landscape character will occur across most of the Site, resulting in a high magnitude of impact. This, assessed against the low sensitivity of the area will result in moderate adverse effects during Year 1 of operation, which is significant.
NYC-05	North Yorkshire Council	Biodiversity and Ecology	North Yorkshire Council Ecology have not yet fully reviewed the proposal however welcome the Applicant's voluntary commitment to BNG and proposed mitigation and compensation. It is considered that issues will be resolved and that an outline CEMP and LEMP to be included in the draft DCO.	The Applicant welcomes the support for the Proposed Development's environmental improvements and Biodiversity Net Gain (BNG), and can confirm that an **Outline Construction Environmental Management Plan (oCEMP) [APP-192]** and **Outline Landscape Environmental Management Plan (oLEMP) [APP-195]** are included within the submission. Both plans are secured through Requirements in the **Draft Development Consent Order (DCO) [APP-017]**.
NYC-06	North Yorkshire Council	Water Resources and Flood Risk	We note that our previous comments have been taken on board and included both in documents and in the production of an outline drainage strategy. We agree with the general principles of the outline drainage strategy, and note that it follows the drainage hierarchy, will incorporate the use of SuDS and will mimic the existing situation with respect to surface water runoff. The outline drainage strategy also refers to the National Standards for SuDS guidance as well as North Yorkshire Council's guidance – we would recommend that this is included in the list of relevant policies in Table 15.3 of Chapter 15 of the ES.	The Applicant makes note of this comment.
NYC-07	North Yorkshire Council	Water Resources and Flood Risk	With respect to the BESS, we note that a fire containment system is proposed to prevent contamination occurring, and that 'downstream' of the automatic shutoff for this the drainage hierarchy will be followed with infiltration being considered first.	The Applicant makes note of this comment and can confirm the Council's understanding is correct.
NYC-08	North Yorkshire Council	Water Resources and Flood Risk	We also note that discharge rates to watercourse have been agreed with the relevant IDB's, and that the Applicant is in discussion with the IDB's with respect to disapplication of Land Drainage Act 1991 in respect of the proposed works.	The Applicant makes note of this comment and can confirm the Council's understanding is correct.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
NYC-09	North Yorkshire Council	Water Resources and Flood Risk	Detailed drainage designs are to be produced for the various works proposed that are in accordance with the outline drainage strategy post-DCO. These will need to be approved by the relevant authorities.	The Applicant makes note of this comment. Requirement 10 (surface and foul water drainage) of the **Draft Development Consent Order (DCO) [APP-017]** requires the detailed surface water drainage Proposed Development(s) to be approved by the relevant planning authority in consultation with Yorkshire Water.
NYC-10	North Yorkshire Council	Socioeconomics, Tourism and Recreation	The Public Rights of Way Team are satisfied to see that the Public Rights of Ways have been included in their documents and continue to work with the developers across their multiple sites.	The Applicant makes note of this comment.
NYC-11	North Yorkshire Council	Noise and Vibration	North Yorkshire Council Environmental Health have not yet fully reviewed the proposal however anticipate that issues related to how construction and operational noise and vibration can be dealt with through the DCO.	The Applicant acknowledges this comment. The **Draft Development Consent Order (DCO) [APP-017]** includes Requirement 12 which states that a Construction Environmental Management Plan must be submitted to and approved by the relevant planning authority and the Environment Agency and implemented as approved. The approved plan includes measures to control noise and vibration during construction. The **Draft Development Consent Order (DCO) [APP-017]** also includes Requirement 15 which states that an Operational Noise Management Plan must be submitted to and approved by the relevant planning authority and implemented as approved. The approved plan sets out the measures which control operational noise.
NYC-12	North Yorkshire Council	Transport and access	North Yorkshire Council Highways have not yet fully reviewed the proposal however there are concerns related to proposed access routes, and certain junctions. The council continues to work with the Applicant on these matters.	The Applicant makes note of this comment. **ES Volume 1, Chapter 14: Traffic and Movement [APP-052]** present the impact assessment undertaken for traffic and details the likely significant effects of the Proposed Development on traffic and movement. The **Transport Assessment (TA) [APP-178]** has been prepared to assess the impact of the Proposed Development on the transport network during construction. The conclusions of the TA are set out in full in Section 7; overall, the TA concludes that any temporary impacts from the Proposed Development can be managed through the final Construction Traffic Management Plan (CTMP), and there is not expected to be any long-term significant impacts on the transport network. **ES Volume 1, Chapter 14: Traffic and Movement [APP-052]** includes a host of mitigation measures including the implementation of an **Outline Construction Traffic Management Plan (oCTMP, [APP-201])** to formalise measures mitigating construction-related effects and the provision of suitable access points for construction vehicles. The provision of appropriate protection or separation between existing Public Rights of Way (PRoW) and construction routes where necessary is covered within the **Outline Public Rights of Way Management Plan (oPROWMP) [APP-199]**.
NYC-13	North Yorkshire Council	Human health	North Yorkshire Council Public Health have not yet fully reviewed the proposal however there are concerns over the impact of the proposal on public health, in particular impacts on mental health and wellbeing. The assessment methodology must robustly consider impacts on the existing and future population over the expected 60-year life span of the project. Appropriate monitoring and review mechanisms are required to be	The LVS EIA Scoping Report (November 2024) considered the potential effects of the Proposed Development on population health. This considered the likely impacts of the project on the social, economic and environmental determinants of health and the location and sensitivity of the resident population and community receptors. As described in the **Scoping Report [APP-143]**, no potentially significant effects on population health were identified and human health was scoped out of the **Environmental Statement (ES) [APP-038 to APP-190]**. This conclusion was supported by the Planning

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
			secured through the DCO where necessary. The Council continues to work with the Applicant on these matters.	Inspectorate (PINS) in their **Scoping Opinion [APP-144]**. The Applicant has continued to actively engage with NYC's Public health team to address their concerns over the perceived potential impacts of the proposal on public health, including any impacts on mental health. The Applicant's view remains as per Scoping that no significant effects on population health have been identified and therefore there is no need to undertake any monitoring activities.
NYC-14	North Yorkshire Council	Battery safety	North Yorkshire Council wishes to ensure that fire safety for BESS is appropriate	The Applicant makes note of this comment. The Applicant's **Outline Battery Safety Management Plan (oBSMP, [APP-196])** incorporates new key mandatory fire and explosion testing and safety requirements included in the revised NFPA 855 (2026) standard. The oBSMP has been prepared to prevent and fully mitigate the risks from a BESS failure event.
NYC-15	North Yorkshire Council	Community benefit	North Yorkshire Council welcomes the opportunity to discuss with the Applicant further how the project can provide community benefits.	The Applicant makes note of this comment, noting that this matter is not relevant to the planning balance for the Proposed Development. The Applicant is committed to providing a Community Benefit Fund to allow for community-driven benefits that are not necessarily associated with the Proposed Development itself as we believe that the communities closest to the project should benefit from it. As a low-cost form of generation, if the project is connected to the electricity transmission network, it will contribute to lowering the cost of energy for all, including locally.
NYC-16	North Yorkshire Council	Agricultural Land and Soils	North Yorkshire Council is concerned over the use of a significant amount of BMV for the project and further discussion is welcomed to better understand the choices for land take including options appraisals and mechanisms used.	The Applicant makes note of this comment. An assessment of the potential effects of the Proposed Development on soils and agricultural land is provided in **ES Volume 1, Chapter 5: Agricultural Land and Soils [APP-043]**. This chapter considers baseline agricultural land quality, including Best and Most Versatile (BMV) land, and assesses likely significant effects arising from construction, operation and decommissioning of the Proposed Development, together with embedded mitigation measures. The 486 ha of BMV land within the Proposed Development (of which approximately 19.1 ha would be required for the permanent elements of the Proposed Development involving soil sealing) would represent approximately 1% of the likely BMV land in Selby District and 0.08% of the likely BMV land in the Yorkshire and Humber Region. The Applicant has had regard to agricultural land quality and relevant policy protections (as detailed in Sections 4.2 and 4.3 of **ES Volume 3, Appendix 3.1: Site Selection Assessment Report (SSAR) [AS-019]** in the design and site selection process and has sought, where practicable, to locate infrastructure on lower quality land. Remediation of compaction and any other effects resulting from soil sealing would be included in the soil management measures for the decommissioning phase, as secured in the **Outline Decommissioning Environmental Management Plan (oDEMP) [APP-194]**.

3 The Applicant's responses to town councils, parish councils and parish meetings

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
Escrick Parish Council				
EPC-01	Escrick Parish Council	Climate Change Resilience and Greenhouse Gas Emissions	The parish of Escrick recognises the national importance of renewable energy and supports the transition to a low-carbon economy. This support is not unconditional and must be balanced against the protection of valued landscapes, heritage assets and long-term sustainability of rural communities.	The Applicant notes and welcomes this comment. Section 2.5 of the Overarching National Policy Statement for Energy (NPS EN-1) is concerned with sustainable development and requires that nationally significant energy infrastructure projects balance the urgent need for low-carbon energy in parallel with the management of environmental impacts. Therefore, the Applicant has undertaken a comprehensive assessment of landscape, heritage and community effects, as detailed in the relevant chapters of the **Environmental Statement (ES) [APP-038 to APP-190].**
EPC-02	Escrick Parish Council	Landscape and Visual	The Proposed Development represents an extensive and industrial-scale intervention across a highly sensitive rural landscape immediately adjoining Escrick and the Escrick Park estate. The scale, distribution, and visual presence of the solar arrays and associated infrastructure would fundamentally alter the character of the area, eroding its openness and historic rural identity.	As set out in **ES Volume 1, Chapter 10: Landscape and Visual [APP-048]**, the Landscape and Visual Impact Assessment (LVIA) has assessed effects of the Proposed Development on the landscape and people's views on the landscape. With regard to Escrick and the Escrick Park Estate, the LVIA includes an assessment of visual receptors along the permissive paths of the Estate, and concludes that views into Solar Development Site 1 are limited by roadside woodland, hedgerows and trees within the parkland alongside. Further detail on the approach to assessing the potential impacts on views is provided in **ES Volume 3, Appendix 10.1: Landscape and Visual Assessment Methodology [APP-167]**. Mitigation measures include substantial new planting, reinforcement of existing vegetation, careful siting of infrastructure, and minimisation of lighting to avoid unnecessary urbanising effects. While landscape mitigation takes time to establish, the LVIA demonstrates that by Year 15 of operation, once planting has matured, the majority of landscape and visual effects would reduce to minor or non-significant levels. Mitigation measures are shown on the **Outline Environmental Masterplans (OEM) [PDA-003 to PDA-010]** and are secured via the **Works Plans [AS-004], Outline Landscape and Ecological Management Plan (oLEMP) [APP-195]**, and the **Design Parameters and Commitments document [APP-217]**.
EPC-03	Escrick Parish Council	Landscape and Visual Cultural Heritage	Particular concern is raised regarding the impact on the setting of heritage assets and the historic estate landscape, where the introduction of large-scale engineered structures would result in a clear and lasting harm to their significance and the close proximity to several isolated dwellings where occupants will effectively be swallowed by the development and encounter major ongoing disturbance not only though the build but throughout the sites operational life.	The Applicant acknowledges the concerns raised regarding potential effects on the setting of heritage assets and the historic landscape. These matters have been assessed within **ES Volume 1, Chapter 8: Cultural Heritage [APP-046]**. With regard to Escrick and the Escrick Park Estate, the assessment includes the Escrick Conservation Area and listed buildings within the Estate as well as the historic associated designed parkland and gardens. The assessment concludes that during construction there may be temporary effects but given the distance separation these are considered to be not significant. Once operational, the views of the solar panels from the Conservation Area and the designated structures therein, would be limited to glimpses and limited to certain angles, therefore not making any physical changes to the heritage assets within Escrick, or its historic landscaped parklands, and not changing their setting in such a way that would impede understanding of their interrelationships or key designed views. The integrity of the designed landscape of Escrick Park will not be compromised and the interrelationship of all assets will be retained. The impacts are considered not significant.

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				Of particular relevance to impacts and ongoing disturbance to properties are **ES Volume 1, Chapter 10: Landscape and Visual [APP-048]**, **Chapter 11: Noise and Vibration [APP-049]**, **Chapter 13: Socioeconomics [APP-051]**, **Chapter 14: Traffic and Movement [APP-052]**, and **Chapter 16: Other Environmental Matters [APP-054]**. Additionally, **ES Volume 1, Chapter 3: Alternatives and Design Iteration [APP-041]** details the measures taken to address concerns that the Proposed Development may be overbearing in relation to nearby residential properties, including the refinement of Solar Development Site boundaries, maximum stand-off distances, and the layout of the Proposed Development. This is secured within **Requirement 4 of the Draft Development Consent Order (DCO) [APP-017]**.
EPC-04	Escrick Parish Council	Landscape and Visual	While the Applicant highlights biodiversity enhancements and reversible land use, the duration of the development (up to 60 years) represents a generational change in land character, effectively constituting a long-term loss of agricultural landscape and rural amenity creating potential for yet further scarring on the already industrial battle scarred landscape through the areas efforts seen in the railway, quarrying, mining, and wartime sacrifices.	The Applicant acknowledges concerns regarding the duration of the Proposed Development and long-term changes to the character of the landscape. **ES Volume 1, Chapter 10: Landscape and Visual [APP-048]** recognises that the Proposed Development would result in the introduction of industrial elements into the landscape, and that the installation of solar panels and associated substations would result in changes to landscape character, primarily associated with a loss of openness and farmland. Paragraph 5.10.5 of EN-1 notes that "*virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation*". As noted in paragraph 10.8.3 of Chapter 10, the LVIA has been key to achieving the criteria for good design set out in NPS EN-1 and the NSIP Advice on Good Design (The Planning Inspectorate 2024) and this has been a key consideration from the outset, including with respect to the siting of infrastructure. Chapter 10 details embedded mitigation measures which would mitigate the effects of the Proposed Development on the landscape, reducing the significance of adverse effects and maximise opportunities for beneficial effects. This will be secured through the measures set out in the **Design Parameters and Commitments document [APP-217]** and the **Outline Landscape and Ecological Management Plan (oLEMP) [APP-195]**. Natural England states in its *Approach to Landscape Character Assessment* that *"our landscapes have evolved over time and they will continue to evolve – change is a constant but outcomes vary"*. The landscape within the majority of the Order Limits is intensively farmed arable land, reflecting modern commercial farming practice. With respect to the concerns raised regarding the long-term loss of agricultural landscape and rural amenity, the design of the Proposed Development will retain the existing topography, field pattern and vegetation within and on the boundaries of the site. Conservation grazing is proposed as a possible method for managing the grassland and if implemented, this would retain some of its agricultural function and existing public rights of way will be retained and improved through additional permissive routes. Therefore, while there will be some changes to the landscape character, the landscape and its rural amenity will not be lost. An assessment of Agricultural Land and Soils is provided in **ES Volume 1, Chapter 5 [APP-043]**. While the operational lifetime of the Proposed Development is anticipated to be up to 60 years, the Proposed Development will be decommissioned at the end of this period and the land will be reinstated where practicable to its pre-construction condition and use, or to a condition agreed with the landowner as set out in the **Outline Decommissioning Environmental Management Plan (oDEMP) [APP-194]**.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
EPC-05	Escrick Parish Council	Alternatives and Design Iteration, and Site Selection	The justification for site selection appears to be primarily driven by grid connectivity and commercial land availability rather than landscape and area suitability, resulting in the inclusion of areas that are demonstrably sensitive and closely associated with established communities and large areas of needless damage to include Escrick on a remote edge. The inclusion of Light Valley Solar site 1 (adjacent to Escrick) in this project makes no sense when the location of the other sites in this Proposed Development are viewed on a map. The transmission distances, cabling required & disruption to the environment involved in including the Escrick site are unacceptable. Site inclusion is purely driven by the landowners willingness to take short term financial gain and there is simply no regard for the human or environmental impact of including the Escrick site in this proposed Proposed Development by those involved.	The Applicant confirms that the existing National Grid Monk Fryston substation has been identified as the point of connection (POC). This decision was based on available capacity, network resilience, and strategic grid planning. As explained in **ES Volume 3, Appendix 3.1: Site Selection Assessment Report (SSAR) [AS-019]**, a search area was identified at a 25 km radius which is considered by the Applicant to be a viable cable connection distance for a solar project of this scale. The POC and 25 km search area are shown on Figure 1, Annex A of the SSAR. Analysis of GIS mapping, guided by NPS policy, identified land free from major constraints such as flood risk, environmental and heritage designations, high-quality agricultural land, Green Belt, and sensitive receptors. These areas were then assessed for suitability based on factors including site size (minimum 40 ha), brownfield availability, and topography. As insufficient land was found, the search was expanded to include some previously excluded land (Grade 2 and 3 agricultural land, Green Belt and Floods Zones 2 and 3). With input from land agents, sites were further evaluated considering access to Monk Fryston Substation, key planning and environmental constraints, and accordance with the project objectives. The **SSAR [AS-019]** concludes there are no more suitable alternative sites within 25 km, and the selected Solar Development Sites are the most appropriate to meet the project objectives. Solar Development Site 1 has been included following an iterative site selection process which balanced technical constraints, environmental considerations and deliverability. The Site falls within the Applicant's defined 25 km viable connection distance and, given its scale (c. 344.8 ha), plays an important role in maintaining Proposed Development viability by its size offsetting transmission losses associated with its distance from the Point of Connection. While landowner willingness and single ownership have supported deliverability, these factors have been considered alongside, rather than in place of, wider site selection and design criteria, as is fully explained in the SSAR. **ES Volume 1, Chapter 3: Alternatives and Design Iteration [APP-041]** establishes that the primary aim of the Cable Route Corridor was to find the most direct alignments between the Monk Fryston Substation and each of the Solar Development Sites. This represents the most operationally efficient route and would be expected to result in fewer impacts and a shorter construction period. **ES Volume 3, Appendix 3.1: Site Selection Assessment Report (SSAR) [AS-019]** sets out further how the Cable Route Corridor Options Area was identified throughout the pre-Application process and how this has been further refined to the Cable Route Corridor presented in the DCO Application. Several factors were considered when determining the Cable Route Corridor design to take a direct route whilst following existing features, such as roads, and avoiding sensitive receptors as far as practicable, such as habitat designations, residential and commercial properties as well as heritage assets. Further, from an operational perspective, high voltage electricity transmission at up to 275kV in this case, is specifically designed to minimise energy losses over long distances. As such, a distance of the approximate 25 km distance involved results in negligible losses.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				The assessments set out in the various chapters of the **ES [APP-038 to APP-190]** detail what impacts are expected as a result of the Proposed Development based on the minimum and maximum parameters of the Proposed Development, and the mitigation and enhancement measures that are proposed to reduce these impacts.
EPC-06	Escrick Parish Council	Agricultural Land and Soils	There would also be considerable long-term damage in the loss of much needed agricultural land for future national independence needs by inclusion of this site. It should be a basic requirement of the Applicant to actually prove their claims that this land is of poor agricultural value. We say that because we know in the community that despite the claims made in the application this land has been in the past and could be in the future, perfectly suitable for sustainable crop production.	The effects of the Proposed Development on agricultural land, including land quality and productivity, are assessed in **ES Volume 1, Chapter 5: Agricultural Land and Soils [APP-043]**, which states that food security has been considered. The Applicant does not consider that food security will be compromised by the Proposed Development (or solar energy more widely), particularly in the context that the 486 ha of BMV land within the Proposed Development (of which/ approximately 19.1 ha would be required for the permanent elements of the Proposed Development involving soil sealing) would represent approximately 1% of the likely BMV land in Selby District and 0.08% of the likely BMV land in the Yorkshire and Humber Region. It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the NPPF. Further, the Government's UK Solar Roadmap (2024) states that solar development is not considered to compromise food security, and that climate change itself poses the greatest long-term risk to food production - a risk which the Proposed Development directly helps to address by providing a secure, low-carbon source of electricity. Government led agricultural initiatives, such as the Sustainable Farming Incentive which is relaunching later in 2026, have prioritised soil health, environmental enhancement and climate resilience, recognising that long term food security is influenced by a range of factors beyond land take alone, including soil condition, climate change and environmental pressures. The Proposed Development allows soils to remain in situ and undisturbed during operation, supporting soil recovery and long-term land health, with land reinstated and returned to agricultural use as far as practicable following decommissioning. No permanent loss of agricultural land is anticipated. It should also be noted that the latest figures to September 2024 indicate that solar occupied around 21,200 ha of agricultural land in the UK. In 2025, 545,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England on 1 June 2025). The areas of each Agricultural Land Classification (ALC) grade affected by the Proposed Development are set out in **ES Volume 3, Appendix 5.1: Agricultural Land Classification [APP-150]**. The ALC survey reports the findings of the ALB and soil resource surveys of the seven Solar Development Sites and details the methodology followed, which is grounded in Natural England guidance and consultation with Natural England. Of the agricultural land within the Solar Development Sites, approximately 402 ha (45%) is confirmed as Subgrade 3b which is a resource of medium sensitivity and not considered BMV land. Approximately 307 ha (34%) is confirmed as Subgrade 3a, while approximately 179.4 ha (20%) is confirmed as Grades 1 and 2. The distribution of ALC grades is shown in **ES Volume 2, Figure 5.2: Agricultural Land Classification [APP-071]**. The 486 ha of BMV land within the Proposed Development (of which approximately 19.1 ha would be required for the permanent elements of the Proposed

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				Development involving soil sealing) would represent approximately 1% of the likely BMV land in Selby District and 0.08% of the likely BMV land in the Yorkshire and Humber Region. Within Site 1, approximately 31.9 ha (9%) of the agricultural land is confirmed as Grade 2, and 155.5 (45%) as Subgrade 3a. The remaining 152.1 ha are Subgrade 3b. During the operational phase of the Proposed Development, the soil resource under the solar PV panels will remain largely undisturbed, and after 60 years the land Proposed Development will be decommissioned and returned to its former use. At the point of decommissioning, the soil quality is expected to have improved from its current status, which is assessed as a significant moderate beneficial effect.
EPC-07	Escrick Parish Council	Cumulative and In-Combination Effects	Furthermore, insufficient weight has been given to cumulative impacts arising from similar large-scale solar proposals in the wider area, which collectively risk transforming the overall character of this part of North Yorkshire.	Each topic chapter, where relevant, has included a cumulative impact assessment, considering other committed developments in the area and potential added impacts to aspects such as traffic. **ES Volume 1, Chapter 17: Cumulative and In-Combination Effects [APP-055]** summarises the cumulative effects assessments completed in **ES Chapters 5 to 15 [APP-043 to APP-053]**. The cumulative landscape and visual assessment concludes that there will be significant cumulative landscape character effects only on Landscape Character Area (LCA)11: Sherburn Farmland and LCA13: Haddlesey Farmland.
EPC-08	Escrick Parish Council	The Proposed Development and DCO Process	Escrick Parish Council therefore considers that the adverse impacts of the proposal significantly outweigh its benefits in this location and that the development, as currently proposed, fails to achieve an appropriate balance between national need and local environmental protection.	The Applicant's **Statement of Need [APP-214]** provides evidence that an unprecedented capacity of new low-carbon generation Proposed Developments is urgently needed for the UK to meet its legally binding climate change targets. The government has confirmed that solar energy is at the heart of the Clean Power 2030 Mission [NPS EN-3 (2025) Paras 2.10.1 & 2.10.2]. The Statement of Need confirms that the need for the Proposed Development is urgent and that substantial weight should be given to the need for the Proposed Development [NPS EN-1 (2023) Para 3.2.9-3.2.10]. The Applicant recognises that the Proposed Development may give rise to adverse environmental impacts, including within and around Escrick. These effects have been assessed within the **Environmental Statement (ES) [APP-038 to APP-190]**, and have informed the iterative design process and embedded mitigation measures. The Applicant is confident that the proposed management and mitigation measures set out in the **ES [APP-038 to APP-190]** are comprehensive and robust and that the Proposed Development aligns with national and local planning policy; this is outlined in the **Planning Statement [APP-207]**. Overall, the **Planning Statement [APP-207]** concludes that these impacts are not significant in the context of the Proposed Development as a whole and are outweighed by the substantial and nationally significant benefits of the Proposed Development, including its contribution towards meeting the identified urgent need.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
Thorpe Willoughby Parish Council				
TWPC-01	Thorpe Willoughby Parish Council	Construction and decommissioning	We believe that the works that will be carried out constructing the solar farms and their Cable Route Corridors will cause major disruption to our village and residents and that of our neighbouring villages.	The likely significant effects of the Proposed Development during the construction phase are assessed throughout the **Environmental Statement (ES) [APP-038 to APP-190]**, including effects on traffic and transport, noise and vibration, air quality, landscape and visual amenity, ecology, and local communities. The ES outlines that there will be significant construction phase adverse residual effects on Best and Most Versatile (BMV) agricultural land, soil resources, landscape character and some viewpoints with mitigation measures reducing all other construction stage effects to not significant. No significant effects are identified for topics such as noise and vibration or air quality. **ES Volume 1, Chapter 2: The Proposed Development [APP-040]** sets out an indicative construction programme for the Proposed Development. As part of the assessment, appropriate mitigation measures have been developed and are incorporated into the Proposed Development. Measures to limit disruption during construction are secured in the **Outline Construction Environmental Management Plan (oCEMP) [APP-192]** and **the Outline Construction Traffic Management Plan (oCTMP) [APP-201]**. The construction of the cable route has also been assessed throughout the **ES [APP-038 to APP-190]**, which considers the effects associated with these works. The ES assesses the cable route within defined parameters, including limits on working width and assumed trench dimensions (as identified within **ES Volume 1, Chapter 2: The Proposed Development [APP-040]** and, where relevant, the **Design Parameters and Commitments document [APP-217]**) to ensure that a reasonable worst-case scenario is assessed. The design commitments that have been made are secured within Schedule 2, Requirement 4 of the **Draft Development Consent Order (DCO) [APP-017]**. The detailed design and construction of the cable route will be undertaken within the parameters authorised by the DCO. Measures to manage and minimise construction effects, including reinstatement of land following installation, are set out in the **oCEMP [APP-192]**. The land use for the Cable Route Corridor would be temporary in nature; once the cable has been laid underground and completed, the land will be reinstated to its previous state and use, allowing for activities such as farming to continue. Requirement 12 in Schedule 2 to the **Draft Development Consent Order (DCO) [APP-017]** secures that a CEMP must be submitted to and approved by the relevant planning authority, and that the CEMP must be substantially in accordance with the **oCEMP [APP-192]**. All construction works must be carried out in accordance with the approved CEMP.
TWPC-02	Thorpe Willoughby Parish Council	Landscape and visual	Our residents and local farmers are very concerned about the proposal and the lasting irreparable damage we believe that it will cause to our landscape.	A detailed Landscape and Visual Impact Assessment (LVIA) has been undertaken and is reported in **ES Volume 1, Chapter 10: Landscape and Visual [APP-048]**. The LVIA assesses the likely significant effects of the Proposed Development on both landscape character and visual amenity during construction, operation and decommissioning, in accordance with the relevant legislation, policy, standards and guidance set out in Section 10.3 of **Chapter 10 [APP-048]**.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				The design of the Proposed Development has been informed by an environmentally led approach, with landscape and visual considerations embedded from the outset. This has included site selection, iterative layout refinement, appropriate offsets from sensitive receptors, and the retention of existing landscape features such as hedgerows, trees and woodland where practicable. These embedded mitigation measures are described in Chapter 10, Section 10.8. Mitigation measures include substantial new planting, reinforcement of existing vegetation, careful siting of infrastructure, and minimisation of lighting to avoid unnecessary urbanising effects. While landscape mitigation takes time to establish, the LVIA demonstrates that by Year 15 of operation, once planting has matured, the majority of landscape and visual effects would reduce to minor or non-significant levels. Mitigation measures are shown on the **Outline Environmental Masterplans (OEM) [PDA-003 to PDA-010]** and are secured via the **Works Plans [AS-004]**, **Outline Landscape and Ecological Management Plan (oLEMP) [APP-195]**, and the **Design Parameters and Commitments document [APP-217]**. The Applicant acknowledges that the Proposed Development would introduce changes to the character of parts of the landscape and to some views. However, the LVIA concludes that, with embedded and additional mitigation, the resulting effects would be localised, reversible and would reduce over time. This approach is consistent with paragraph 5.10.5 of the Overarching National Policy Statement for Energy (NPS EN 1), which recognises that *"virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape,"* while also acknowledging that beneficial landscape character effects may arise through mitigation.
TWPC-03	Thorpe Willoughby Parish Council	Landscape and visual	We believe that the Proposed Development is entirely unsuitable in both scale and location.	The Proposed Development has been designed to maximise the energy generation benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects. The Applicant is committed to delivering a Proposed Development that makes a meaningful contribution to the UK's transition to net zero, while also seeking to minimise adverse impacts and maximise opportunities for environmental enhancement and community benefits. Section 8 of the **Statement of Need [APP-214]** sets out the evidence to support the suitability of the proposed location of the Proposed Development for large-scale solar plus storage in relation to the timeliness and availability of the grid connection, transmission system operability and the decarbonisation and energy security benefits the Proposed Development will bring forward from this location. The Statement of Need confirms that the need for the Proposed Development is urgent and that substantial weight should be given to the need for the Proposed Development [NPS EN-1 (2023) Para 3.2.9-3.2.10]. The Applicant confirms that the existing National Grid Monk Fryston substation has been identified as the point of connection (POC). This decision was based on available capacity, network resilience, and strategic grid planning. As explained in **ES Volume 3, Appendix 3.1: Site Selection Assessment Report (SSAR) [AS-019]**, a search area was identified at a 25 km radius which is considered by the Applicant to be a viable

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				cable connection distance for a solar project of this scale. The POC and 25 km search area are shown on Figure 1, Annex A of the SSAR. Analysis of GIS mapping, guided by NPS policy, identified land free from major constraints such as flood risk, environmental and heritage designations, high-quality agricultural land, Green Belt, and sensitive receptors. These areas were then assessed for suitability based on factors including site size (minimum 40 ha), brownfield availability, and topography. As insufficient land was found, the search was expanded to include some previously excluded land (Grade 2 and 3 agricultural land, Green Belt and Floods Zones 2 and 3). With input from land agents, sites were further evaluated considering access to Monk Fryston Substation, key planning and environmental constraints, and accordance with the project objectives. The SSAR concludes there are no more suitable alternative sites within 25 km, and the selected Solar Development Sites are the most appropriate to meet the project objectives.
TWPC-04	Thorpe Willoughby Parish Council	The Proposed Development and DCO Process	We believe that the Proposed Development will pose a serious and lasting threat to our surrounding communities.	The Applicant is confident that the proposed management and mitigation measures set out in the **Environmental Statement [APP-038 to APP-190]** are comprehensive and robust, and will assist in reducing the impacts of the Proposed Development on the local population. Of particular relevance to the assessment of effects on local communities are **ES Volume 1, Chapter 10: Landscape and Visual [APP-048]**, **Chapter 11: Noise and Vibration [APP-049], Chapter 13: Socioeconomics [APP-051]**, **Chapter 14: Traffic and Movement [APP-052]**, and **Chapter 16: Other Environmental Matters [APP-054]**, all of which consider potential impacts on residential properties and local communities and include mitigation measures that are based on good practice used on projects across the UK, as well as measures developed in response to the sensitivities of the local environment. **ES Volume 1, Chapter 17: Cumulative and In-Combination Effects [APP-055]** provides a summary of any potentially significant environmental effects of the Proposed Development. With mitigation in place, both embedded and those secured as additional mitigation, adverse (significant) effects are generally limited to the construction phase of the Proposed Development and are limited to visual impacts on a handful of individual properties and residents living on the edge of villages closest to the Solar Development Sites; as well as visual effects on a number of Public Rights of Ways (PRoWs) and road users close to the Proposed Development Sites. No significant effects are assessed for any other environmental aspects. At operation (Year 15), limited significant effects are assessed as remaining with significant visual effects remaining on only 1 property and four PRoWs that are either within or directly adjacent to the Solar Development Sites.
TWPC-05	Thorpe Willoughby Parish Council	Cultural Heritage	We believe that the Proposed Development will pose a serious and lasting threat to our cultural heritage.	A full assessment of potential impacts on listed buildings and below ground archaeology has been carried out within **ES Volume 1, Chapter 8: Cultural Heritage [APP-046]**, including a site walkover and a settings assessment, geophysical survey of the Solar Development Sites and Cable Route Corridor **[APP-161 to APP-163]** and trial trenching (reported in **ES Volume 3, Appendix 8.4: Trial Trenching Reports [APP-164]**) of Solar Development Sites. The Applicant acknowledges that the designated heritage assets within Thorpe Willoughby are located in close proximity to Cable Route Corridor 1-4 and Cable Route

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				Corridor 1-4a, but outside of the Order Limits. Whilst they may experience temporary effects to its setting from construction, there will be no significant effects as a result of the Proposed Development. Mitigation is embedded into the Proposed Development including avoidance of direct physical impacts to designated heritage assets, and landscape reinstatement, including replanting of and tree or hedge lengths lost, following the installation of the Cable Route Corridor to minimise changes in the setting of heritage assets. This is secured within **Requirement 12 of the Draft Development Consent Order (DCO) [APP-017]**. Within the Cable Route Corridor where confirmed areas of archaeological interest have been identified as a result of geophysical survey, appropriate mitigation measures are outlined within the **Archaeological Mitigation Strategy [APP-200]** which is secured through Requirement 11 of the **Draft Development Consent Order (DCO) [APP-017]**.
TWPC-06	Thorpe Willoughby Parish Council	Agricultural Land and Soils	We believe that the Proposed Development will pose a serious and lasting threat to food security and the environment.	The effects of the Proposed Development on agricultural land, including land quality and productivity, are assessed in **ES Volume 1, Chapter 5: Agricultural Land and Soils [APP-043]**, which states that food security has been considered. The Applicant does not consider that food security will be compromised by the Proposed Development (or solar energy more widely), particularly in the context that the 486 ha of BMV land within the Proposed Development (of which/ approximately 19.1 ha would be required for the permanent elements of the Proposed Development involving soil sealing) would represent approximately 1% of the likely BMV land in Selby District and 0.08% of the likely BMV land in the Yorkshire and Humber Region. It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the NPPF. Further, the Government's UK Solar Roadmap (2024) (Ref 27) states that solar development is not considered to compromise food security, and that climate change itself poses the greatest long-term risk to food production - a risk which the Proposed Development directly helps to address by providing a secure, low-carbon source of electricity. Government-led agricultural initiatives, such as the Sustainable Farming Incentive which is relaunching later in 2026, have prioritised soil health, environmental enhancement and climate resilience, recognising that long-term food security is influenced by a range of factors beyond land take alone, including soil condition, climate change and environmental pressures. The Proposed Development allows soils to remain in situ and undisturbed during operation, supporting soil recovery and long-term land health, with land reinstated and returned to agricultural use as far as practicable following decommissioning. As set out in the **Outline Decommissioning Environmental Management Plan (oDEMP) [APP-194]**, post-decommissioning of the Proposed Development, the landowners would choose how the land is to be used and managed. The landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
TWPC-07	Thorpe Willoughby Parish Council	Agricultural Land and Soils	A large percentage of the land proposed for this development falls under Best and Most Versatile Land (BMV). When Government Guidance reinforces the need to protect BMV land and prioritise food production, this land should not be claimed and compulsory purchased for this Proposed Development when more suitable options exist. Both the NPPF and the National Policy Statement for Renewable Energy Infrastructure (EN-3) emphasise the importance of using lower-grade or previously developed land for renewable energy Proposed Developments.	The effects of the Proposed Development on agricultural land, including land quality and productivity, are assessed in **ES Volume 1, Chapter 5: Agricultural Land and Soils [APP-043],** which states that food security has been considered. The Applicant does not consider that food security will be compromised by the Proposed Development (or solar energy more widely), particularly in the context that the 486 ha of BMV land within the Proposed Development (of which/ approximately 19.1 ha would be required for the permanent elements of the Proposed Development involving soil sealing) would represent approximately 1% of the likely BMV land in Selby District and 0.08% of the likely BMV land in the Yorkshire and Humber Region. It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the NPPF. Further, the Government's UK Solar Roadmap (2024) (Ref 27) states that solar development is not considered to compromise food security, and that climate change itself poses the greatest long-term risk to food production - a risk which the Proposed Development directly helps to address by providing a secure, low-carbon source of electricity. Government-led agricultural initiatives, such as the Sustainable Farming Incentive which is relaunching later in 2026, have prioritised soil health, environmental enhancement and climate resilience, recognising that long-term food security is influenced by a range of factors beyond land take alone, including soil condition, climate change and environmental pressures. The Proposed Development allows soils to remain in situ and undisturbed during operation, supporting soil recovery and long-term land health, with land reinstated and returned to agricultural use as far as practicable following decommissioning. It should also be noted that the latest figures to September 2024 indicate that solar occupied around 21,200 ha of agricultural land in the UK. In 2025, 545,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England on 1 June 2025). As set out in the **Outline Decommissioning Environmental Management Plan (oDEMP) [APP-194],** post-decommissioning of the Proposed Development, the landowners would choose how the land is to be used and managed. The landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate. Whilst there is an environmental and economic cost to importing food, and it is recognised the UK imports a far greater amount of food than it exports. . As explained in **ES Volume 3, Appendix 3.1: Site Selection Assessment Report (SSAR) [AS-019]**, a search area was identified at a 25 km radius which is considered by the Applicant to be a viable cable connection distance for a solar project of this scale. The identified point of connection (POC) at Monk Fryston substation and the 25 km search area are shown on Figure 1, Annex A of the SSAR. Analysis of GIS mapping, guided by NPS policy, identified land free from major constraints such as flood risk, environmental and heritage designations, high-quality agricultural land, Green Belt, and sensitive receptors. These areas were then assessed for suitability based on factors including site size (minimum 40 ha), brownfield availability, and topography. As insufficient land was found, the search was expanded to include some

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				previously excluded land (Grade 2 and 3 agricultural land, Green Belt and Flood Zones 2 and 3). With input from land agents, sites were further evaluated considering access to Monk Fryston Substation, key planning and environmental constraints, and accordance with the project objectives. The SSAR concludes there are no more suitable alternative sites within 25 km, and the selected Solar Development Sites are the most appropriate to meet the project objectives. The Applicant's goal is to deliver the Proposed Development on land where the owner has voluntarily agreed to its use, including for cabling. Meaningful conversations with identified land interests for the solar areas have helped inform the design which in turn assists in avoiding people's land, including homes or gardens. As is standard in Nationally Significant Infrastructure Project (NSIP) solar projects, the **Draft Development Consent Order (DCO) [APP-017]** includes provision for compulsory acquisition of land and rights, but these are subject to controls and limitations. These powers sought are necessary and proportionate to ensure the deliverability of the Proposed Development. All landowners who are involved in the solar and battery elements of the Proposed Development have agreed to be involved in the project on a voluntary basis.
TWPC-08	Thorpe Willoughby Parish Council	Biodiversity and Ecology	Light Valley Solar's assertion of a 'biodiversity gain' cannot justify the permanent loss of quality, productive agricultural land - particularly in rural communities like the locations in this proposal, which have long upheld traditions of sustainable farming. With the permanent soil degradation, it is unlikely to ever return to agricultural land, therefore the development is not just for the duration of the LVS project lifespan – it is indefinite.	See above in respect of agriculture aspects. The planning balance considered within the **Planning Statement [APP-207]** considers all of the benefits as well as the adverse effects associated with the Proposed Development, including biodiversity net gain and loss of agricultural land, alongside the need for Clean Power to address climate change and concludes that the benefits of the Proposed Development outweigh the limited adverse impacts.
TWPC-09	Thorpe Willoughby Parish Council	Cultural Heritage Landscape and Visual	The villages directly impacted by this proposal possess historical heritage and valuable community assets, including Grade I and II listed buildings, Roman archaeological sites, centuries old farming traditions, designated Conservation Areas, Green Belt land and Locally Important Landscape Areas. This development threatens to cause irreversible harm to these cultural, ecological and historical assets, undermining the character and identity of the local community.	A full assessment of potential impacts on heritage assets has been carried out within **ES Volume 1, Chapter 8: Cultural Heritage [APP-046]**. The assessment included a site walkover, settings assessment, Geophysical survey of the **Solar Development Sites and Cable Route Corridor [APP-161 to APP-163]** and trial trenching (reported in **ES Volume 3, Appendix 8.4: Trial Trenching Reports [APP-164]**) of Solar Development Sites. The assessment concludes that there will be no significant adverse effects on Listed Buildings within the Order Limits or wider study area. Some minor adverse effects on setting or glimpsed views of construction activities and/or panels are possible. Mitigation includes avoidance of direct physical impacts to designated heritage assets, and landscape planting to reinforce existing hedgerows strengthening the landscape pattern as secured through the **Outline Landscape and Ecological Management Plan (oLEMP) [APP-195]**. Consultation with NYC's Conservation Officer has concluded that any harm to listed buildings will be less than substantial. Analysis of the geophysical survey data concluded there is limited potential for buried archaeological remains to be present outside of areas where geophysical survey has been completed and has identified a potential for archaeological remains to be present, which could be impacted upon by the Proposed Development.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				An **Archaeological Mitigation Strategy [APP-200]** has been prepared to mitigate impacts on the archaeological resource from the Proposed Development, which is secured through Requirement 11 of the **Draft Development Consent Order (DCO) [APP-017]**. **ES Volume 1, Chapter 8: Cultural Heritage [APP-046]** concludes that with additional mitigation the potential for impacts on archaeological remains within the Order Limits is up to minor adverse and is not significant. In regard to green belt, the government made a significant change to Green Belt policy with the introduction of the grey belt. **Planning Statement Appendix 2 Grey Belt Assessment [APP-209]** and Section 7.5 of the **Planning Statement [APP-207]** summarise why the Proposed Development is now considered to be located on grey belt land, meaning that the Proposed Development can be considered to be not inappropriate within the Green Belt. The impacts on locally important landscape areas are covered within **ES Volume 1, Chapter 10: Landscape and Visual [APP-048].** Landscape Character Area 8 and 14 coincide with the Locally important landscape areas designated in the Selby Local Plan. The assessment identifies significant residual impacts for LCA14 during construction, but the effects will not be significant by Year 15 of operation.
TWPC-10	Thorpe Willoughby Parish Council	Transport and access	In Thorpe Willoughby, the construction of Cable Route Corridors will cause major congestion disruption to our village. All of the construction traffic (mainly HGV's) is set to use the A63, which already operates beyond safe capacity as it stands and is set to get even more congested with recent planning permission granted in Thorpe Willoughby for 280 new homes and Hambleton for 250 homes with another 100 homes expected to be granted in the coming months. Therefore, the amount of traffic that will be travelling across this route will be completely unacceptable.	The Applicant notes this concern. Baseline traffic conditions on the network, including on the A63, have been established using site-specific surveys and Department for Transport data, with flows presented within the **Transport Assessment (TA) [APP-178]**. The assessment does not identify any existing safety or operational issues on this section of the network, with no evidence of accident clustering or underlying highway safety concerns. The TA assesses the impact of the Proposed Development on the transport network during construction. Construction routing to the site would utilise a variety of routes, as outlined in the TA, with the A63 at Hambleton forecast for an average of 24 additional daily movements during the construction period. This equates to a 0.2% increase in total vehicles and a 2% increase in HGVs. The conclusions of the TA are set out in full in Section 7; overall, the TA concludes that any temporary impacts from the Proposed Development can be managed through the final Construction Traffic Management Plan (CTMP), and there is not expected to be any long-term significant impacts on the transport network. An **Outline Construction Traffic Management Plan (oCTMP) [APP-201]** has been submitted as part of the Application. Future baseline conditions within the Transport Assessment include allowance for background traffic growth through the application of TEMPro factors, and the cumulative assessment accounts for committed development within the study area. The large number of cumulative developments impacting the A63 are acknowledged within Section 6 of the TA, where a total of 3,327 committed development movements are accounted for on the A63 at Hambleton. The construction phasing of all the committed developments will be considered when updating the final CTMP, to ensure that the construction routing of temporary traffic increases associated with the Proposed Development would not have an unacceptable cumulative effect on local traffic conditions.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
TWPC-11	Thorpe Willoughby Parish Council	Biodiversity and Ecology	The scale of the development will mean that a significant amount of habitat is lost or significantly altered. The wildlife in the area such as hares and deer will be impacted by the development and the environmental reports produced by the developers does not seem to accurately reflect the impact on our wildlife.	Brown hare have been considered in the assessment as set out in **ES Volume 1, Chapter 6: Biodiversity [APP-044]**, and commuting routes through the site for deer, e.g. ditches, hedgerows and their surrounding buffers, have been included throughout the Proposed Development and fencing has been designed to work around these commuting routes The assessment concludes that there will be no significant effects on brown hares. The **oCEMP [APP-192]** details methods to protect hares and a pre commencement check for leverets by an ECoW if certain areas of habitat are cleared during brown hare breeding season.
TWPC-12	Thorpe Willoughby Parish Council	Noise and Vibration	The noise levels will pose a significant impact on our community in both the construction phase and also once operational. The environmental report states that the noise impact has been assessed and will be minimal but as the topography of the area is very flat with minimal barriers between fields, we believe that sound will travel a significant distance and even more so on windy days.	The assessment of construction noise is undertaken in accordance with the British Standard BS5228 Code of practice for noise and vibration control on construction and open sites - Noise (Part 1). The assessment of operational noise is undertaken in accordance with the British Standard 4142:2014+A1:2019 Methods for rating and assessing industrial and commercial sound. The assessments of construction and operational noise and vibration are undertaken in accordance with in Section 11.5 of **ES Volume 1, Chapter 11: Noise and Vibration [APP-049]** and results of the assessment are in Section 11.9. A three-dimensional noise model has been developed for construction noise calculation which includes topographical information from the National LiDAR Programme 2023 (Defra Survey open data). This includes local topography and any existing intervening ground or structures. The study area extends 1km from the main Solar Development Sites as predicted sound levels beyond this distance are unlikely to result in a significant effect. Noise propagation has been modelled using proprietary software in accordance with BS ISO 9613-2:2024 Acoustics - Attenuation of sound during propagation outdoors - Part 2: Engineering method for the prediction of sound pressure levels outdoors. This standard assumes downwind propagation conditions, i.e. wind blowing from the source to the receiver, representing a cautious assumption for meteorological conditions.
Burton Salmon Parish Council				
BSPC-01	Burton Salmon Parish Council	Landscape and visual	While the Council supports the transition to renewable energy, this Proposed Development would result in unacceptable harm to the local landscape character and rural setting of Burton Salmon. The scale, extent, and industrial appearance of the proposal would urbanise open countryside, eroding valued views and the village's distinct identity	A detailed Landscape and Visual Impact Assessment (LVIA) has been undertaken and is reported in **ES Volume 1, Chapter 10: Landscape and Visual [APP-048].** This assessment acknowledges that the Proposed Development would introduce changes to the character of parts of the landscape and to some views but concludes that, with embedded and additional mitigation, the resulting effects would be localised, reversible and would reduce over time. This is consistent with paragraph 5.10.5 of the Overarching National Policy Statement for Energy (NPS EN 1), which recognises that *"virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape,"* while also acknowledging that beneficial landscape character effects may arise through mitigation. A small part of the Cable Route Corridor crosses the parish boundary of Burton Salmon. As shown in **ES Volume 2, Figure 10.3.2: Selby District Published Landscape Character Areas [APP-092]**, Burton Salmon lies in the western part of the LVIA study area, within LCA 8: West Selby Limestone Ridge, defined in the Selby

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				Landscape Character Assessment. The LVIA concludes that the residual effects on LCA 8 during construction and decommissioning would be minor adverse, which is not significant and by year 15 of operation, there would be no effect. Mitigation measures are shown on the **Outline Environmental Masterplans (OEM) [PDA-003 to PDA-010]** and are secured via the **Works Plans [AS-004], Outline Landscape and Ecological Management Plan (oLEMP) [APP-195]**, and the **Design Parameters and Commitments document [APP-217]**.
BSPC-02	Burton Salmon Parish Council	Agricultural Land and Soils	The development would also lead to the loss of agricultural land, raising concerns about food security and the long-term stewardship of productive farmland.	The effects of the Proposed Development on agricultural land, including land quality and productivity, are assessed in **ES Volume 1, Chapter 5: Agricultural Land and Soils [APP-043]**, which states that food security has been considered. The Applicant does not consider that food security will be compromised by the Proposed Development (or solar energy more widely), particularly in the context that the 486 ha of BMV land within the Proposed Development (of which/ approximately 19.1 ha would be required for the permanent elements of the Proposed Development involving soil sealing) would represent approximately 1% of the likely BMV land in Selby District and 0.08% of the likely BMV land in the Yorkshire and Humber Region. It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the NPPF. Further, the Government's UK Solar Roadmap (2024) (Ref 27) states that solar development is not considered to compromise food security, and that climate change itself poses the greatest long-term risk to food production - a risk which the Proposed Development directly helps to address by providing a secure, low-carbon source of electricity. Government-led agricultural initiatives, such as the Sustainable Farming Incentive which is relaunching later in 2026, have prioritised soil health, environmental enhancement and climate resilience, recognising that long-term food security is influenced by a range of factors beyond land take alone, including soil condition, climate change and environmental pressures. The Proposed Development allows soils to remain in situ and undisturbed during operation, supporting soil recovery and long-term land health, with land reinstated and returned to agricultural use as far as practicable following decommissioning. No permanent loss of agricultural land is anticipated.
BSPC-03	Burton Salmon Parish Council	Transport and access	In addition, insufficient information has been provided to demonstrate that impacts on local highways can be satisfactorily mitigated.	The Applicant notes this comment. A **Transport Assessment (TA) [APP-178]** has been prepared which assesses the impact of the Proposed Development on the transport network during construction. An **Outline Construction Traffic Management Plan (oCTMP, [APP-201])** has also been prepared which identifies the routes that should be used by construction traffic. The oCTMP also includes measures to minimise any impacts during construction by reducing HGV movements during the peak hours and managing employee movements. Overall, it is considered that any temporary impacts from the Proposed Development can be managed through the CTMP, and there is not expected to be any long-term significant impacts on the transport network.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
BSPC-04	Burton Salmon Parish Council	Landscape and visual	In addition, insufficient information has been provided to demonstrate that impacts on residential amenity can be satisfactorily mitigated.	The location of residential receptors was factored into the design of the Proposed Development, including minimum set-back of solar panels and other infrastructure from properties; as a result, effects to residential amenity are not identified. With respect to residential visual amenity, Landscape Institute Technical Guidance Note (TGN) 01/24 explains in point 6(1) that views from houses and individual properties are a matter of private amenity, noting that it is an established planning principle that there is no right to a view. The LVIA has not identified any significant adverse residual effects on the views of residents that would breach the Residential Visual Amenity threshold and cause serious harm to the living conditions of residents (major adverse) and therefore a Residential Visual Amenity Assessment (RVAA) has not been carried out. Further information is provided in Table 10-5 of **ES Volume 1, Chapter 10: Landscape and Visual [APP-048]**.
BSPC-05	Burton Salmon Parish Council	Biodiversity and Ecology	In addition, insufficient information has been provided to demonstrate that impacts on biodiversity can be satisfactorily mitigated.	Potential impacts of the Proposed Development on ecology and biodiversity are assessed in **ES Volume 1, Chapter 6: Biodiversity [APP-044]** and **ES Volume 1, Chapter 12: Ornithology [APP-050],** which considers baseline conditions and evaluates likely effects during construction, operation and decommissioning. The assessment identifies embedded and additional mitigation measures and concludes that, with these measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated. A comprehensive package of habitat retention, creation, enhancement and long-term management measures is proposed to avoid, reduce and mitigate impacts and to deliver Biodiversity Net Gain. These include the protection of existing habitats, creation of new habitats, and long-term ecological management to improve habitat quality over the lifetime of the Proposed Development. The ecological mitigation and enhancement proposals, including BNG measures, are illustrated on the **Outline Environmental Masterplans (OEM) [PDA-003 to PDA-010]** and detailed in the **Outline Landscape and Ecological Management Plan (oLEMP) [APP-195]** and the **Outline Bird Mitigation Area Management Plan (oBMAMP) [APP-205].** The **oLEMP [APP-195]** includes provisions for habitat establishment, maintenance and ecological monitoring to confirm that mitigation and enhancement measures are functioning as intended and to identify and implement remedial measures where required. It is expected that the Proposed Development will have a gain of approximately 70% Habitat BNG, including 78.58% for habitats, 73% for hedgerows, and 10.42% for watercourses based on the current development proposals. Full details of the gain are set out in the **Biodiversity Net Gain (BNG) Report [APP-220]**.
BSPC-06	Burton Salmon Parish Council	Cumulative and In-Combination Effects	In addition, insufficient information has been provided to demonstrate that cumulative effects with other nearby energy Proposed Developments can be satisfactorily mitigated.	Information regarding cumulative effects can be found in **Environmental Statement (ES) Volume 1, Chapter 17: Cumulative and In-Combination Effects [APP-055]**. Through developing the ES, each topic chapter, where relevant, has included a cumulative impact assessment, considering other committed developments in the area and potential added impacts to aspects such as traffic. The topic-specific conclusions are summarised in each relevant topic chapter of the ES and in Table 17-12 of **ES Volume 1, Chapter 17: Cumulative and In-Combination Effects [APP-055]**.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				The cumulative assessment has taken into account nearby developments, including other solar projects, that fall within the relevant zones of influence for each topic to evaluate potential combined effects. Many of these developments are located within North Yorkshire, with some in nearby administrative areas due to the proximity of the Proposed Development to other administrative areas. The assessment concludes there will be significant adverse cumulative landscape and visual effects with three other energy Proposed Developments and a locally significant loss of BMV land (not significant at a regional level). No other significant adverse cumulative effects were found.
Wistow Parish Council				
WPC-01	Wistow Parish Council	Water Resources and Flood Risk	I am already dealing with many drainage issues in the village following Selby coalfield	The Applicant recognises the concerns raised in relation to existing flooding and drainage issues. However, responsibility for addressing pre-existing issues do not rest with the Applicant nor do any remedial works in respect of such matters. Notwithstanding this, the Proposed Development includes appropriate mitigation measures to manage surface water and flood risk arising from the works. These measures are intended to ensure the Proposed Development does not create new flooding impacts on third-party land nor exacerbate or worsen any existing issues.
Monk Fryston Parish Council				
MFPC-01	Monk Fryston Parish Council	Landscape and visual	a. MFPC's primary objection to the proposal relates to scale and location insofar as the proposal (when combined with other locally consented energy proposals) encompasses almost every view into and out from the Parish.	The Applicant acknowledges concerns regarding potential cumulative visual effects on Monk Fryston. As set out in **ES Volume 1, Chapter 10: Landscape and Visual [APP-048]**, cumulative effects are assessed within Section 10.14, which identifies relevant committed and reasonably foreseeable developments within the Zone of Influence and considers their combined effects on landscape character and visual amenity. The LVIA concluded that the Proposed Development is likely to lead to some cumulative landscape and visual effects. These effects reflect changes to the landscape and visual experiences that would emerge delivering an infrastructure project of such scale, as recognised through NPS EN-1 which acknowledges in paragraph 5.10.5 that 'virtually all nationally significant energy infrastructure projects will impact the landscape'. The settlement of Monk Fryston is physically separated from the Proposed Development, with no infrastructure located within 400m from residential properties. The parish extends further east and includes Solar Development Site 2 and parts of CRC 2-6 and this includes visual receptors including people living in the wider landscape, using public rights of way and the local road network. **ES Volume 2, Figure 10.4.2: Zone of Theoretical Visibility (ZTV) - Screened [APP-094]** suggests that there would be very limited visibility within the settlement of Monk Fryston with intervening vegetation and built form screening the views toward the Proposed Development. Visual receptors in the eastern part of the parish associated with representative viewpoints VP14, 27, 66 and 68, as shown in **ES Volume 2, Figure 10.5: Viewpoints Plan [APP-095]**, are predicted to experience moderate adverse effects (significant) at construction and Year 1 of operation. However, the LVIA assesses that residual effects would reduce to minor or negligible adverse and would not be significant as the mitigation establishes by year 15 of operation.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				Taking account of the existing landscape structure and proposed mitigation, ES Chapter 10, concludes that cumulative effects on the landscape (LCA11 Sherburn Farmland) would be significant during construction and year 1 of operation but would not be significant by year 15 of operation. Significant cumulative visual effects are not predicted. The assessment results relevant to LVIA are further detailed within Table 17-12 of **ES Volume 1, Chapter 17: Cumulative and In-Combination Effects [APP-055]**.
MFPC-02	Monk Fryston Parish Council	Landscape and visual	b. This proposal when combined with other consented Proposed Developments will significantly alter the character of the landscape that surrounds the settlement such that it will no longer be regarded as a rural location.	The Applicant acknowledges this comment and has addressed in the response above (comment MFPC-01).
MFPC-03	Monk Fryston Parish Council	Landscape and visual	c. MFPC is additionally concerned over the proximity to dwellings of these proposals.	The use of buffer zones is set out in the **Design Parameters and Commitments document [APP-217]** and the **Design Approach Document (DAD) [APP-216]**, which sets out the Applicant's approach to addressing the criteria for good design for energy infrastructure set out in Section 4.7 of NPS EN-1 more broadly. As detailed in the **Design Parameters and Commitments document [APP-217]**, the minimum offset from residential properties will be 30m from the curtilage of properties. This buffer zone was established following pre-application consultation, EIA scoping, and environmental surveys and assessments. The Applicant is confident that the proposed management and mitigation measures set out in the **Environmental Statement (ES) [APP-038 to APP-190]** are comprehensive and robust and will assist in reducing the impacts of the Proposed Development on the local population. Of particular relevance to the assessment of effects on local communities are **ES Volume 1, Chapter 10: Landscape and Visual [APP-048]**, **Chapter 11: Noise and Vibration [APP-049]**, **Chapter 13: Socioeconomics [APP-051]**, **Chapter 14: Traffic and Movement [APP-052]**, **and Chapter 16: Other Environmental Matters [APP-054],** all of which consider potential impacts on residential properties and local communities and include mitigation measures that are based on good practice used on projects across the UK, as well as measures developed in response to the sensitivities of the local environment.
MFPC-04	Monk Fryston Parish Council	Transport and access	MFPC wishes to make representations on the roads to be used in the construction of the proposals and in particular the forecast number and times of construction vehicles impacting on the A63 through Monk Fryston and on some of the smaller roads required for direct construction access or emergency routes. For this size of Proposed Development, significant workforce traffic would also add to the traffic congestion concerns over a protracted period at peak traffic times.	The Applicant notes this concern. Workforce traffic has been accounted for within the **Transport Assessment (TA) [APP-178]**, including assumptions regarding number of construction staff, mode share and trip distribution. Trip generation is further detailed in Section 5 of the TA. In addition, a robust approach has been adopted within the assessment to ensure that impacts are not underestimated, including the testing of peak construction scenarios. Based on this approach, temporary traffic impacts are predicted to be capable of being effectively managed. The TA assesses the impact of the Proposed Development on the transport network during construction. Construction routing to the site would utilise a variety of routes, as

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				outlined in the TA, with the A63 at Monk Fryston forecast for an average of 117 additional daily movements during the construction period. This equates to a temporary 1% increase in total vehicles and a 10% increase in HGVs. The conclusions of the TA are set out in full in Section 7; overall, the TA concludes that any temporary impacts from the Proposed Development can be managed through the final Construction Traffic Management Plan (CTMP), and there is not expected to be any long-term significant impacts on the transport network. The Applicant reiterates its commitment to road safety, and notes that with implementation of the final version of the **Outline Construction Traffic Management Plan (oCTMP) [APP-201]**, roads should be no less safe than they currently are. Highway Improvement Areas (HIAs) have been identified where required to support the safe movement of construction traffic. HIAs are sections of the highway network where localised improvements are proposed, such as improvements to the road edge where it is deteriorated and provision of temporary passing places within the existing highways boundary, traffic management, and provision of visibility splays, or temporary highway and traffic works required to safely accommodate the Abnormal Indivisible Load (AIL) deliveries. While these measures will benefit construction traffic, including AILs, they will also enhance road safety and general usability for all road users; for example, the provision of passing places on narrower roads enabling regular and construction traffic to pass each other with ease.
MFPC-05	Monk Fryston Parish Council	Transport and access	b. There is little information on how this will be mitigated and would ask that the developer expands on proposals for workforce traffic management.	An **Outline Construction Traffic Management Plan (oCTMP) [APP-201]** has been developed. A final Construction Traffic Management Plan (CTMP) will be developed by the appointed Principal Contractor (PC) prior to the commencement of construction. This will set out the measures to be implemented, including promoting lower carbon travel by communicating local public transport, pedestrian and cycle routes to construction staff. Section 3.5 of the oCTMP notes that, while the rural location and early shift patterns mean most workers are expected to travel by private vehicle, the Proposed Development aims to reduce single-occupancy car journeys through the provision of shared minibus transport, encouraging car sharing, and providing secure cycle parking within the construction compounds.
MFPC-06	Monk Fryston Parish Council	Transport and access	c. MFPC is particularly concerned over adding vehicle numbers to the A63/A162 roundabout which is currently congested at am and pm peak hours.	The Applicant has been engaging with the NYC highways team in regard to proposed improvements to this roundabout. NYC Highways have advised that design work is already underway for improvements to this roundabout to provide additional capacity for a range of committed developments within the surrounding area. These improvements are being implemented by NYC Highways as their project, and it is anticipated that these works will be completed by 2028. As a NYC project, these improvements will be brought forward independently of the Proposed Development. If these are not delivered in time to benefit the Proposed Development, the additional trips generated would represent a small proportionate increase only and would not change the conclusions of the ES. Nevertheless, construction vehicles could be directed to take alternative routes, as set out in Section 3.7 of the **Outline Construction Traffic Management Plan (oCTMP) [APP-201]**.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
MFPC-07	Monk Fryston Parish Council	Agricultural Land and Soils	MFPC is concerned over the loss of farmland from the proposal overall.	An assessment of the potential effects of the Proposed Development on soils and agricultural land is provided in **ES Volume 1, Chapter 5: Agricultural Land and Soils [APP-043]**. This chapter considers baseline agricultural land quality, including Best and Most Versatile (BMV) land, and assesses likely significant effects arising from construction, operation and decommissioning of the Proposed Development, together with embedded mitigation measures. The Proposed Development will result in a temporary and reversible loss of agricultural land for the operational life of the Proposed Development. **ES Volume 1, Chapter 5: Agricultural Land and Soils [APP-043]** sets out that, as the Proposed Development is temporary, albeit long-term (lifetime of the Proposed Development), and reversible, the ISEP guidance indicates that the magnitude for the change of use of agricultural land for the panel areas, including all temporary construction elements and access tracks required, is low. The Proposed Development would have a direct, long-term, temporary and reversible moderate adverse effect on Grades 1 and 2 agricultural land, which is assessed as significant, and minor adverse effects on Subgrade 3a and 3b agricultural land, which is not significant. These effects are fully reported in the ES and are a matter for the Secretary of State to weigh in the planning balance against the need for the Proposed Development and its wider benefits. During the operational phase of the Proposed Development, the soil resource under the solar PV panels will remain largely undisturbed, and following decommissioning, the soil quality is expected to have improved from its current status, which is assessed as a significant moderate beneficial effect. Measures to avoid and minimise effects on soils and agricultural land are embedded within the Proposed Development design and secured through Schedule 2, Requirement 17 of the **Draft Development Consent Order (DCO) [APP-017]** which includes the preparation and implementation of a Soil Resource Management Plan (SRMP) in substantial accordance with the **oSRMP [APP-203]**. The SRMP will control soil handling, storage and reinstatement during construction, operation and decommissioning, and a requirement to prepare and implement a Decommissioning Environmental Management Plan in substantial accordance with the **oDEMP [APP-194]**, which is secured by Schedule 2, Requirement 19 of the **Draft Development Consent Order (DCO) [APP-017]**. The Applicant confirms that none of the land will be considered brownfield automatically after decommissioning. The expectation is that the land will return to farming, but the Applicant cannot dictate what will happen to the land post-decommissioning when the Applicant no longer has an interest in the land. However, any proposal taken forward by a landowner after decommissioning would be seen in the context that the lawful use, post-solar, would be the land use that is currently taking place on that land.no permanent loss of agricultural land is anticipated.
MFPC-08	Monk Fryston Parish Council	Agricultural Land and Soils	b. MFPC considers food security to be on an equal footing to energy security with climate change impacting on food production as shown in recent years.	The effects of the Proposed Development on agricultural land, including land quality and productivity, are assessed in **ES Volume 1, Chapter 5: Agricultural Land and Soils [APP-043]**, which states that food security has been considered. The Applicant does not consider that food security will be compromised by the Proposed Development (or solar energy more widely), particularly in the context that the 486 ha of BMV land within the Proposed Development (of which/ approximately 19.1 ha would be required for the permanent elements of the Proposed Development involving soil sealing) would represent approximately 1% of the likely BMV land in Selby District and

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				0.08% of the likely BMV land in the Yorkshire and Humber Region. It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the NPPF. Further, the Government's UK Solar Roadmap (2024) (Ref 27) states that solar development is not considered to compromise food security, and that climate change itself poses the greatest long-term risk to food production - a risk which the Proposed Development directly helps to address by providing a secure, low-carbon source of electricity. Government-led agricultural initiatives, such as the Sustainable Farming Incentive which is relaunching later in 2026, have prioritised soil health, environmental enhancement and climate resilience, recognising that long-term food security is influenced by a range of factors beyond land take alone, including soil condition, climate change and environmental pressures. The Proposed Development allows soils to remain in situ and undisturbed during operation, supporting soil recovery and long-term land health, with land reinstated and returned to agricultural use as far as practicable following decommissioning. As set out in the **Outline Decommissioning Environmental Management Plan (oDEMP) [APP-194]**, post-decommissioning of the Proposed Development, the landowners would choose how the land is to be used and managed. The landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate.
MFPC-09	Monk Fryston Parish Council	Agricultural Land and Soils	c. MFPC does not consider a 60-year period to be a temporary loss of high-quality farmland.	The Applicant notes this comment. While the operational lifetime of the Proposed Development is anticipated to be up to 60 years, the Proposed Development will be decommissioned at the end of the operational period and the land will be reinstated where practicable to its pre-construction condition and use, or to a condition agreed with the landowner as set out in the **Outline Decommissioning Environmental Management Plan (oDEMP) [APP-194]**.
MFPC-10	Monk Fryston Parish Council	Agricultural Land and Soils	d. MFPC considers the significant loss of Best and Most Versatile Land could have been reduced through considering land of a lower grade by considering alternative locations and reduced even further through the consideration of alternative technologies (e.g. a combination of solar and wind power).	Site selection is addressed in **ES Volume 1, Chapter 3: Alternatives and Design Iteration [APP-041]** and **ES Volume 3, Appendix 3.1: Site Selection Assessment Report (SSAR) [AS-019]**. The SSAR explains how brownfield land, industrial land, previously developed land, and low-grade agricultural land were considered through the site selection process. Section 6 of the **Statement of Need [APP-214]** provides an analysis of many different low carbon generation technologies which are being developed as part of the UK's fight against climate change. The Statement of Need concludes, in Section 6.12, that a large capacity of many low carbon technologies is required to meet the Government's energy objectives. Section 3.9 of **ES Volume 1, Chapter 3: Alternatives and Design Iteration [APP-041]** states that the Solar Development Sites are considered suitable for solar energy generation due to their topography and the irradiance levels in this part of the country, proximity to a point of connection, and availability. Given this, and the fact that the Applicant is a solar and battery development company which stands ready to help deliver the Government's ambition in its Clean Power Action Plan (Ref 6) to achieve 45-47 GW of installed solar capacity by 2030, other technologies have not

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				been considered by the Applicant in the development of the Proposed Development. Section 3.9.4 to 3.9.5 of the chapter further discusses suitability, or lack thereof, for alternative forms of generation.
MFPC-11	Monk Fryston Parish Council	Agricultural Land and Soils	e. MFPC considers there to be a conflict with Selby CS 2013 Policy SP18.	The Applicant makes note of this comment. The **Planning Statement [APP-207]** and **Policy Compliance Document [APP-224]** demonstrate how the Applicant has considered and responded to national and local policy Site selection is addressed in **ES Volume 1, Chapter 3: Alternatives and Design Iteration [APP-041]** and **ES Volume 3, Appendix 3.1: Site Selection Assessment Report (SSAR) [AS-019]**. The SSAR explains how brownfield land, industrial land, previously developed land, and low-grade agricultural land were considered through the site selection process. Measures to avoid and minimise effects on soils and agricultural land are embedded within the Proposed Development design and secured through Schedule 2, Requirement 17 of the **Draft Development Consent Order (DCO) [APP-017]** which includes the preparation and implementation of a Soil Resource Management Plan (SRMP) in substantial accordance with the **oSRMP [APP-203]**. The SRMP will control soil handling, storage and reinstatement during construction, operation and decommissioning, and a requirement to prepare and implement a Decommissioning Environmental Management Plan in substantial accordance with the **oDEMP [APP-194]**, which is secured by Schedule 2, Requirement 19 of the **Draft Development Consent Order (DCO) [APP-017]**. The overall approach to design and mitigation have been informed through pre-application engagement with Natural England. It is therefore considered that the Proposed Development is compliant with local and national policy in respect to site selection, design and agricultural land, including Policy SP18 of the Core Strategy 2013.
MFPC-12	Monk Fryston Parish Council	Landscape and visual	In this topic, MFPC's concerns go beyond the Parish Boundary. The extract below from the projects EIA 'Theoretical Zone of Visibility' relates only to this project and does not include the ongoing projects of Battery Storage around Monk Fryston Sub-Station and recent significant upgrades, including new transmission towers and extension to Monk Fryston Sub-Station. This aspect also does not include the recently consented Noventum 50MW Solar Farm (PINS Appeal Ref: APP/U2750/W/25/3369368) immediately east and south-east of Monk Fryston and Hillam. Note Monk Fryston and Hillam operate as a combined settlement in Policy SP2 of the Selby CS 2013.	The Applicant makes note of this comment. The Applicant has included an assessment of the landscape and visual effects of the Proposed Development within **ES Volume 1, Chapter 10: Landscape and Visual [APP-048]**. It is important to clarify that **ES Volume 2, Figure 10.4.2: Zone of Theoretical Visibility (ZTV) - Screened [APP-094]** presents a ZTV for the Proposed Development only, in accordance with standard LVIA practice, and was presented and accepted by North Yorkshire Council. The ZTV therefore does not represent cumulative visibility and should not be interpreted as illustrating the theoretical combined visibility of multiple Proposed Developments. Furthermore, a ZTV is a computer generated map which has been used to inform the identification of visual receptor groups and representative viewpoints. It is not a definitive tool for showing where the Proposed Development would be visible from. This is explained further in Section 1.2 of **ES Volume 3, Appendix 10.1: Landscape and Visual Assessment Methodology [APP-167]**.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				The future baseline included in the LVIA explicitly recognises that the landscape is subject to ongoing change arising from consented energy infrastructure and other development, including solar, battery storage and transmission projects. As set out in paragraph 10.7.107, the assessment incorporates the consented Hillam Solar Farm (also referred to as the Noventum Proposed Development), which is located adjacent to Solar Development Sites 3 and 4 and is directly considered within the assessment of landscape and visual effects. The cumulative effects are assessed within Section 10.14 of **ES Chapter 10 [APP-048]**. The assessment results relevant to LVIA are further detailed within Table 17-12 of **ES Volume 1, Chapter 17: Cumulative and In-Combination Effects [APP-055]**. This includes, as listed within the Table 10-27, relevant infrastructure projects such as the Monk Fryston Battery Energy Storage System (ID 70, ZG2024/1099/SCN) and major transmission works associated with the Yorkshire GREEN project (ID 5), including upgrades to the Monk Fryston substation and associated transmission towers. Taking account of the existing landscape structure and proposed mitigation, **ES Chapter 10 [APP-048]**, concludes that cumulative effects on the landscape (LCA11 Sherburn Farmland) would be significant during construction and year 1 of operation would not be significant by year 15 of operation. Cumulative visual effects are not predicted.
MFPC-13	Monk Fryston Parish Council	Landscape and visual	b. Of equal concern is that current proposals and figures do not adequately convey the visual impact of large power transformers and associated substation equipment / civil works including buildings used to connect and step-up the voltage of the solar panels to facilitate connection to the National Grid.	The landscape and visual impact assessment (LVIA) within **ES Volume 1, Chapter 10: Landscape and Visual [APP-048]** has been undertaken on a worst-case basis, applying, the maximum parameters for the height of the elements within the Proposed Development set out in the **Design Parameters and Commitments document [APP-217]**. **ES Volume 2, Figure 10.4.1: Zone of Theoretical Visibility (ZTV) - Bare Earth [APP-093]** and **Figure 10.4.2: Zone of Theoretical Visibility (ZTV) - Screened [APP-094]** incorporates the modelling of the 275 kV substation as a uniform mass of up to 13 m in height across its full footprint, as shown on the **Works Plans [AS-004]**, providing a deliberately precautionary representation of visibility. The design parameters for the 275 kV On-Site substations are set out in **ES Volume 1, Chapter 2: Description of Development [APP-040]** Table 2-1 Design Parameters for the Environmental Statement, secured through the **Design Parameters and Commitments document [APP-217]** and have informed the visual assessments in Chapter 10.
MFPC-14	Monk Fryston Parish Council	Construction and Decommissioning	c. Also, there is little information on the proposed temporary compounds and construction laydown areas - including how they will be constructed, what they will look like, how they will be utilised, (main and satellite for example), welfare and emergency provisions, offices and meeting rooms, car parking and transportation facilities,	Temporary construction compound details are described within Section 2.7 of **ES Volume 1, Chapter 2: The Proposed Development [APP-040]** and the **Outline Construction Environmental Management Plan (oCEMP) [APP-192]**. Requirement 12 in Schedule 2 to the **Draft Development Consent Order (DCO) [APP-017]** secures that a CEMP must be submitted to and approved by the relevant planning authority, and that the CEMP must be substantially in accordance with the **Outline CEMP [APP-192]**. All construction works must be carried out in accordance with the approved CEMP.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
MFPC-15	Monk Fryston Parish Council	Landscape and visual	d. How this is all managed will have a significant impact to the relevant areas during construction. We would ask that the developer expands on these aspects further.	Relevant management measures relating to construction are set out in Chapter 10, Section 10.10, and are secured via the **Outline Construction Environmental Management Plan (oCEMP) [APP-192]**. Requirement 12 in Schedule 2 to the **Draft Development Consent Order (DCO) [APP-017]** secures that a CEMP must be submitted to and approved by the relevant planning authority, and that the CEMP must be substantially in accordance with the **Outline CEMP [APP-192]**. All construction works must be carried out in accordance with the approved CEMP.
MFPC-16	Monk Fryston Parish Council	Landscape and visual	e. MFPC considers the scale and speed of landscape change arising from this proposal when combined with other project to be unacceptable to its residents as they traverse in all directions.	Information regarding cumulative effects can be found in **ES Volume 1, Chapter 17: Cumulative and In-Combination Effects [APP-055]**. In addition, through developing the ES, each topic chapter, where relevant, has included a cumulative impact assessment, considering other committed developments in the area and potential added impacts to aspects such as landscape and visual. While summaries of the cumulative assessments undertaken for each topic are included in the topic's **ES chapter [APP-038 to APP-056]**, **ES Volume 1, Chapter 17: Cumulative and In-Combination Effects [APP-055]** Table 17-12 provides the broader overall conclusions regarding cumulative and in-combination effects for **ES Chapters 5 to 15 [APP-043 to APP-053]**. It has been assessed that the Proposed Development is likely to lead to some cumulative landscape and visual effects during construction, year 1 of operation and decommissioning stages. These effects represent the change to the landscape and visual experiences that would emerge during any change to the landscape, as recognised through NPS EN-1 which acknowledges in Section 5.10 *"and 'virtually all nationally significant energy infrastructure projects will impact the landscape'"*. It should be noted that with proposed mitigation in place and following initial establishment, landscape and visual impacts will generally reduce over time.
MFPC-17	Monk Fryston Parish Council	Landscape and visual	f. MFPC wishes the Inspector to note the remarks of NYC's Landscape Officer in their Report to Strategic Planning Committee 10th February 2026, para 4.8. The report states: "We (NYC) have concerns about the potential negative cumulative effects on local communities such as Escrick, Monk Fryston, Hillam, Birkin, Hambleton: the major transformative scale of the Proposed Development in combination with other major development; the significance of the grid connection point at Monk Fryston Substation; the pace of change and the erosion of the landscape and visual baseline around those settlement areas affected." (underling and bold our emphasis)	The Applicant makes note of this comment and will continue engagement with the NYC's landscape officer to discuss their concerns.
MFPC-18	Monk Fryston Parish Council	Landscape and visual	g. MFPC echoes the views of the Council's Landscape Officer and wish to present these opinions at the EiP.	The Applicant makes note of this comment.
MFPC-19	Monk Fryston Parish Council	Landscape and visual	h. MFPC considers the proposal would be of an inappropriate scale in this countryside location, which would result in a prominent development that would	The Proposed Development has been designed to maximise and deliver the greatest possible energy generation benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
			detrimentally harm the character and appearance of the area. This would conflict with Policy ENV1 of the LP and Policies SP2, SP13 and SP18 of the Selby 2013 CS.	Further information on the Applicant's approach to addressing the criteria for good design for energy projects is provided in the **Design Approach Document (DAD) [APP-216]**. As per the description set out in **ES Volume 1, Chapter 2: The Proposed Development [APP-040]** the total area within the DCO Order Limits encompasses approximately 1,270 hectares (ha). Of this, the 'Solar Development Sites' comprise approximately 900 ha of land. Around 680 ha of this land is proposed as being required for installation of solar PV panels and associated infrastructure. The remaining 220 ha would provide areas dedicated to ecological mitigation, measurable Biodiversity Net Gain (BNG) delivery, landscaping, offsets and agricultural land managed for environmental enhancement and habitat creation. These measures are set out in **ES Volume 1, Chapter 6: Biodiversity [APP-044]**, **Design Approach Document (DAD) [APP-216]** and detailed within the **Outline Landscape and Ecological Management Plan (oLEMP) [APP-195]**. The Applicant included the assessment of the landscape and visual effects of the Proposed Development within **ES Volume 1, Chapter 10: Landscape and Visual [APP-048].** National Policy Statement (NPS) EN-3 Paras 2.10.11 and 2.10.18 explain that the availability of grid connection, suitable irradiance levels, and local topography are key inputs to the selection of sites suitable for large-scale solar generation developments. The number of locations within the UK at which large-scale solar generation is suitable is therefore likely to be limited, and this is a material issue when considering how the UK is to meet the urgent need for low carbon generation as is set out in the NPSs. This point is expanded upon in the **Statement of Need [APP-214]**, with Section 8 providing evidence to support the suitability of the location of the Proposed Development for large-scale solar plus storage in relation to the timeliness and availability of the grid connection, transmission system operability and the decarbonisation and energy security benefits the Proposed Development will bring forward from this location. The **Planning Statement [APP-207]** and **Policy Compliance Document [APP-224]** demonstrate how the Applicant has considered and responded to national and local policy, including Policies ENV1, SP2, SP13 and SP18 of North Yorkshire Council's adopted local plans. It is therefore considered that the Proposed Development is compliant with local and national policy in respect to the principle of development and its consideration of environmental impacts.
MFPC-20	Monk Fryston Parish Council	Water Resources and Flood Risk	MFPC has concerns over land drainage. MFPC wishes to present their concerns that relate to the low-lying land within and adjoining the Parish to ensure appropriate drainage strategies fully mitigate (with climate change allowances) the impact arising from the development.	The Applicant makes note of this comment. Flood risk from all relevant sources has been carefully considered within the **Flood Risk Assessment (FRA, [APP-179])**. The FRA assesses both the risk of flooding to the development itself and the potential effects of the Proposed Development on flood risk elsewhere, including from surface water runoff, in line with current planning policy and guidance including relevant climate change allowances. The assessment has been informed by consultation and engagement with the Environment Agency, Lead Local Flood Authority, and relevant Internal Drainage Boards. Appropriate mitigation measures are proposed within the FRA and the **Outline Drainage Strategy (ODS) [APP-182]** to ensure that surface water run-off or flood risk is not increased as a result of the development.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
MFPC-21	Monk Fryston Parish Council	Water Resources and Flood Risk	b. The developer is also proposing major cable works over significant areas of land as detailed in the Cable Route Corridors. This will inevitably impact the existing land drainage, some of which will be historic and not identifiable on any plans. There is little or no information on how these drains will be identified, designs made and agreed prior to the works and then subsequent monitoring to ensure the surrounding areas are not impacted or compromised.	The **Outline Construction Environmental Management Plan (oCEMP) [APP-192]** commits to consultation with affected landowners to investigate the current extent of land drainage. Where necessary, pre-construction land drainage will be explored with the aim of maintaining the efficiency of the existing drainage system and the integrity of the working areas during construction. Any land drains temporarily disturbed or damaged during construction would be reinstated, diverted, or otherwise made good to their original condition upon completion of the works to ensure that existing surface water and land drainage arrangements are maintained post-construction.
MFPC-22	Monk Fryston Parish Council	Biodiversity and Ecology	MFPC has concerns over the potential impact on ecology and biodiversity in the Parish and neighbouring areas. In particular, MFPC remains to be satisfied the proposals adequately address the topics of habitat fragmentation or the potential disruption to ecological corridors having regard to the cumulative impacts of other consented proposals.	Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 6: Biodiversity [APP-044]** and **ES Volume 1, Chapter 12: Ornithology [APP-050]**. The Applicant has followed a robust environmentally led design process taking account of the mitigation hierarchy. This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the Proposed Development. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. Potential impacts of the Proposed Development on ecology and biodiversity are assessed in **ES Volume 1, Chapter 6: Biodiversity [APP-044]** and **Chapter 12: Ornithology [APP-050]**, which considers baseline conditions and evaluates likely effects during construction, operation and decommissioning. The assessment identifies embedded and additional mitigation measures and concludes that, with these measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated. A comprehensive package of habitat retention, creation, enhancement and long-term management measures is proposed to avoid, reduce and mitigate impacts and to deliver Biodiversity Net Gain. These include the protection of existing habitats, creation of new habitats, and long-term ecological management to improve habitat quality over the lifetime of the Proposed Development. The ecological mitigation and enhancement proposals, including BNG measures, are illustrated on the **Outline Environmental Masterplans (OEM) [PDA-003 to PDA-010]** and detailed in the **Outline Landscape and Ecological Management Plan (oLEMP) [APP-195] and the Outline Bird Mitigation Area Management Plan (oBMAMP) [APP-205]**. The **oLEMP [APP-195]** includes provisions for habitat establishment, maintenance and ecological monitoring to confirm that mitigation and enhancement measures are functioning as intended and to identify and implement remedial measures where required. It is expected that the Proposed Development will have a gain of approximately 78.58% for habitats, 73% for hedgerows, and 10.42% for watercourses based on the current development proposals. Full details of the gain are set out in the **Biodiversity Net Gain (BNG) Report [APP-220]**. The preparation, approval and implementation of a detailed Landscape and Ecological Management Plan and BNG Strategy, substantially in accordance with the **oLEMP [APP-195]**, is secured through the **Draft Development Consent Order (DCO) [APP-017]**, ensuring that ecological mitigation and enhancement measures are delivered,

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				monitored and maintained throughout the lifetime of the Proposed Development. The process undertaken to assess cumulative impacts is outlined above, which included the approach taken for biodiversity impacts. **ES Volume 1, Chapter 17: Cumulative and In-Combination Effects [APP-055]** and **ES Volume 1, Chapter 6: Biodiversity [APP-044]** state that no significant cumulative effects are concluded in relation to Biodiversity. With regards to habitat fragmentation, existing commuting corridors within the Solar Development Sites, such as hedgerows, ditches, and treelines will be retained, buffered, and appropriately protected through all phases of the development to ensure fauna are still able to pass through the development, ensuing habitats do not become fragmented. Furthermore, fencing within the development will be constructed to allow small mammals (including otter and badger), amphibians and reptiles to pass through. In addition, large commuting corridors are proposed within the Solar Development Sites comprising neutral grassland and other valuable ecological habitats which will remain unfenced, allowing the maintained permeability of the Order Limits for a range of fauna including larger mammals such as deer. The presence of these numerous existing and newly created commuting corridors within the Proposed Development will limit habitat fragmentation alone and furthermore, the arable land that will be lost will be replaced with grassland beneath the solar panels, which will also form suitable commuting habitat for a range of fauna.
MFPC-23	Monk Fryston Parish Council	The Proposed Development and DCO Process	a. MFPC object the impact on the loss of Green belt land take.	The Applicant makes note of this comment. Table 7-4 of the **Planning Statement [APP-207]** identifies which components of the Proposed Development are located within Green Belt land. Solar Development Sites (SDSs) 2, 3 and 4, and Cable Route Corridor segments (CRCs) 2-6, 3-4, 3-4a and 4-POC, are wholly or partly located within the West Yorkshire Green Belt. In December 2024, the government made a significant change to Green Belt policy with the introduction of the grey belt. **Planning Statement Appendix 2 Grey Belt Assessment [APP-209]** and Section 7.5 of the **Planning Statement [APP-207]** summarise why the Proposed Development is now considered to be located on grey belt land, meaning that the Proposed Development can be considered to be not inappropriate within the Green Belt.
MFPC-24	Monk Fryston Parish Council	Cultural heritage	a. MFPC objects to the impact on the setting of heritage assets including listed buildings and conservation areas.	The Applicant acknowledges this concern and can confirm that a full assessment of potential impacts on listed buildings and the Monk Fryston Conservation Area was carried out and is detailed within **ES Volume 1, Chapter 8: Cultural Heritage [APP-046]**. The assessments included a site walkover and an assessment of the overall setting of the conservation area. The listed buildings assessment concludes that there will be no significant adverse effects on Listed Buildings within the Order Limits or wider study area. Some minor adverse effects on setting or glimpsed views of construction activities and/or panels are possible. Where possible, impacts have been mitigated by design. Mitigation includes avoidance of direct physical impacts to designated heritage assets, and landscape reinstatement, including replanting of and tree or hedge lengths lost, following the installation of the Cable Route Corridor to minimise changes in the setting of heritage assets. This is set out within the **Outline CEMP [APP-192]** secured via **Requirement**

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				12 of the Draft Development Consent Order (DCO) [APP-017] as well as **Outline Landscape and Ecological Management Plan (oLEMP) [APP-195]**, and the **Design Parameters and Commitments document [APP-217]**. Consultation with NYC's Conservation Officer has concluded that any harm to listed buildings will be less than substantial. In respect to Monk Fryston Conservation Area, the ES concludes that while the village's rural surroundings make a key contribution to its significance, views of the solar panels would be screened by the modern development in the eastern end of the village, as well as the dense woodland in the Monk Fryston Hall estate. As this screening would be limited to glimpsed views, it is considered that overall, the impact will be minor. The **Outline Construction Environmental Management Plan (oCEMP) [APP-192]** secures measures to mitigate impacts to the Monk Fryston Conservation Area and other cultural heritage and archaeological aspects during the construction phase.
MFPC-25	Monk Fryston Parish Council	Cultural heritage	b. The proposals when considered alongside other consented proposals significantly impact on the rural setting of the MF Conservation Area, contrary to Policy SP18 of the Selby 2013 CS.	The Applicant makes note of this comment and provides information above. The **Planning Statement [APP-207]** and **Policy Compliance Document [APP-224]** demonstrate how the Applicant has considered and responded to national and local policy in relation to cultural heritage. **ES Volume 1, Chapter 8: Cultural Heritage [APP-046]** supported by geophysical surveys, archaeological evaluations and Statements of Significance and Impact Assessments, presents an assessment of impacts on archaeological remains, Important Hedgerows, and heritage assets (including views). The ES concludes that designated heritage assets will experience loss of significance as a result of the Proposed Development and that Proposed Development does not significantly impact any international or national sites for conservation. It is therefore considered that the Proposed Development is compliant with local and national policy in respect to cultural heritage, including Policy SP18 of the Core Strategy 2013. As outlined within Table 17-12 of **ES Volume 1, Chapter 17: Cumulative and In-Combination Effects [APP-055]** it is not anticipated that the Proposed Developments considered within Section 8.13 of Chapter 8 will lead to any significant cumulative heritage effects with the Proposed Development.
MFPC-26	Monk Fryston Parish Council	The Proposed Development and DCO Process	a. MFPC remains to be convinced the project is viable and wish the Inspector to examine this topic. The proposal is expansive and comprises multiple sites over great distance. Costs associated with cable connections, substations and step up transformers will be considerable. The topic needs to be explained by the developer.	The Applicant acknowledges comments regarding the cost effectiveness and profitability of the Proposed Development. However, it is important to clarify that Light Valley Solar is a privately financed development. All financial risks associated with the construction, operation, and maintenance of the Proposed Development, including those related to the cable route, are borne entirely by the developer. The commercial viability of the Proposed Development has been assessed as part of the developer's investment decision, including the length of the cable and associated infrastructure. The **Funding Statement [APP-021]** submitted with the DCO application demonstrates that the Proposed Development is financially viable and adequately funded to deliver the Proposed Development in full.

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MFPC-27	Monk Fryston Parish Council	Community benefit	a. Notwithstanding the developer's commitment to deliver Community Befits as a means of mitigation, there are currently no measure as to the scale of such proposals. While MFPC accept this is not a planning balance issue, it remains important to the Parish, and we respectfully request time at the EiP on how such an offer can be legally binding.	The Applicant remains committed to working with North Yorkshire Council to develop its community benefit proposals, including how they are secured.
Hillam Parish Council				
HPC-01	Hillam Parish Council	Landscape and visual	Hillam Parish Council strongly disagrees with the industrialisation of vast areas of Green Belt Land and Open Space to install solar panels to provide 'green' energy	The Applicant acknowledges that the Proposed Development would introduce changes to the character of parts of the landscape and to some views. However, the LVIA concludes that, with embedded and additional mitigation, the resulting effects would be localised, reversible and would reduce over time. This approach is consistent with paragraph 5.10.5 of the Overarching National Policy Statement for Energy (NPS EN 1), which recognises that "*virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape*," while also acknowledging that beneficial landscape character effects may arise through mitigation. With regard to the Green Belt, the Applicant acknowledges that Solar Development Sites 2, 3 and 4, as well as areas of the Cable Route Corridor are wholly or partially located within the West Yorkshire Green Belt, with the policy compliance considered within Section 7.5 of the **Planning Statement [APP-207]** and the **Policy Compliance Document [APP-224]**. The Planning Statement identifies that the Proposed Development is located on grey belt land as the Sites do not strongly contribute to Green Belt purposes and there are no overriding policy constraints that would justify refusal. The Proposed Development does not constitute inappropriate development in the grey belt, meaning the test of very special circumstances does not need to be engaged. However, should the Secretary of State not accept the conclusion that the Proposed Development is not inappropriate in the grey belt, the Proposed Development is defined as Critical National Priority (CNP) Infrastructure in NPS-1, which sets out a presumption in favour of CNP Infrastructure projects in the planning balance, where specific requirements are met. The Applicant considers the tests for the presumption in favour of CNP development to be satisfied due to the Proposed Development's significant contribution to renewable energy, energy security, biodiversity gains, and wider environmental and public benefits, and therefore would meet the test for very special circumstances.
HPC-02	Hillam Parish Council	Agricultural Land and Soils	These installations should be taking place on the rooftops of industrial parks, using brownfield sites and it must be made compulsory to install them on every new home built in the UK before any Green Space is even considered for use.	The use of brownfield land or alternative locations, including rooftops, has been addressed in **ES Volume 1, Chapter 3: Alternatives and Design Iteration [APP-041]** and in the **Statement of Need [APP-214]**. The Applicant has considered alternatives, including previously developed land and other forms of solar deployment, as part of the site selection and design evolution process, as reported in **ES Volume 3, Appendix 3.1: Site Selection Assessment Report (SSAR) [AS-019]**. The alternative options are not suitable as there is no available brownfield land within the search area of sufficient scale to accommodate a 500MW solar Proposed Development. Former power station sites were considered but are either operational, already consented, or committed for other developments. Rooftop Proposed Developments cannot deliver the necessary scale, even when

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				combined, and while sites adjacent to linear infrastructure were explored, no suitable, available, and unconstrained land was identified.
Hambleton Parish Council				
HBPC-01	Hambleton Parish Council	Landscape and visual	Hambleton Parish Council strongly disagrees with the industrialisation of vast areas of Green Belt Land and Open Space to install solar panels to provide 'green' energy	The Applicant acknowledges that Solar Development Sites 2, 3 and 4, as well as areas of the Cable Route Corridor are wholly or partially located within the West Yorkshire Green Belt, with the policy compliance considered within Section 7.5 of the **Planning Statement [APP-207]** and the **Policy Compliance Document [APP-224]**. The Planning Statement identifies that the Proposed Development is located on grey belt land as the Sites do not strongly contribute to Green Belt purposes and there are no overriding policy constraints that would justify refusal. The Proposed Development does not constitute inappropriate development in the grey belt, meaning the test of very special circumstances does not need to be engaged. However, should the Secretary of State not accept the conclusion that the Proposed Development is not inappropriate in the grey belt, the Proposed Development is defined as Critical National Priority (CNP) Infrastructure in NPS-1, which sets out a presumption in favour of CNP Infrastructure projects in the planning balance, where specific requirements are met. The Applicant considers the tests for the presumption in favour of CNP development to be satisfied due to the Proposed Development's significant contribution to renewable energy, energy security, biodiversity gains, and wider environmental and public benefits, and therefore would meet the test for very special circumstances.
HBPC-02	Hambleton Parish Council	Agricultural Land and Soils	These installations should be taking place on the rooftops of industrial parks, using brownfield sites and it must be made compulsory to install them on every new home built in the UK before any Green Space is even considered for use.	National policy and government guidance, as set out in the **Statement of Need [APP-214]**, recognise that while rooftop and smaller-scale solar installations are an important part of the energy mix, they cannot alone meet the scale of capacity required to achieve clean power and net zero objectives. Large-scale ground-mounted solar therefore remains necessary in addition to, not instead of, rooftop solar. The Applicant has considered previously developed land and other forms of solar deployment, as part of the site selection and design evolution process, as reported in **ES Volume 3, Appendix 3.1: Site Selection Assessment Report (SSAR) [AS-019]**.The alternative options are not suitable as there is no available brownfield land within the search area of sufficient scale to accommodate a 500MW solar Proposed Development. Former power station sites were considered but are either operational, already consented, or committed for other developments. Rooftop Proposed Developments cannot deliver the necessary scale, even when combined, and while sites adjacent to linear infrastructure were explored, no suitable, available, and unconstrained land was identified.
Birkin Parish				
BPC-01	Birkin Parish	Alternatives and Design Iteration, and Site Selection	While the Parish supports renewable energy generation in principle, it considers that this proposal is fundamentally unacceptable in its location, scale and impact, particularly in relation to Site 4 and its direct effects on the small rural community of Birkin.	The Applicant notes this comment. Respondents expressed concern for the potential impacts on Birkin community. National Policy Statement (NPS) EN-3 Paras 2.10.11 and 2.10.18 explain that the availability of grid connection, suitable irradiance levels, and local topography are key inputs to the selection of sites suitable for large-scale solar generation developments. The number of locations within the UK at which large-scale solar generation is suitable is therefore likely to be limited, and this is a material issue when considering how the UK is to meet the urgent need for low carbon generation as

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				is set out in the NPSs. This point is expanded upon in the **Statement of Need [APP-214]**, with Section 8 providing evidence to support the suitability of the proposed location of the Proposed Development for large-scale solar plus storage in relation to the timeliness and availability of the grid connection, transmission system operability and the decarbonisation and energy security benefits the Proposed Development will bring forward from this location. Site selection is addressed in **ES Volume 1, Chapter 3: Alternatives and Design Iteration [APP-041]** and **ES Volume 3, Appendix 3.1: Site Selection Assessment Report (SSAR) [AS-019]**. An appraisal of alternative sites within a 25km radius of the Existing National Grid Monk Fryston Substation has been undertaken, which concludes that there are no more suitable locations within the 25km search area than the proposed location for the Proposed Development. With regard to potential effects on Birkin, **Volume 1, Chapter 10: Landscape and Visual [APP-048]** acknowledges the potential for significant visual effects on residents of Birkin and nearby properties as a result of intermittent views of construction activity. These effects would be temporary in nature and would not occur for the whole construction period of the Proposed development. No other significant environmental effects are identified for receptors at Birkin during the construction period with appropriate mitigation in place. **ES Volume 1, Chapter 13: Socioeconomics [APP-051]** did identify potential significant effects on Birkin Fishery and Birkin Fisheries tearoom during construction, prior to mitigation, however these have all been mitigated to be not significant through additional receptor specific mitigation including screening, traffic scheduling, safe access routes and ongoing engagement around construction activities. No specific significant environmental effects are identified on the community of Birkin at operation.
BPC-02	Birkin Parish	Construction and decommissioning	The Parish considers that Birkin would experience disproportionate and acute harm relative to its size and limited capacity to absorb industrial-scale construction activity.	The likely significant effects of the Proposed Development during the construction phase are assessed throughout the **ES [APP-038 to APP-190],** including effects on traffic and transport, noise and vibration, air quality, landscape and visual amenity, ecology, and local communities. Furthermore, **ES Volume 1, Chapter 2: The Proposed Development [APP-040]** sets out an indicative construction programme for the Proposed Development. **ES Volume 1, Chapter 18: Conclusions and Summary of Environmental Effects [APP-056]** outlines the likely significant residual construction effects assessed within the ES. The assessment concludes that the residents of Birkin would experience intermittent views of construction activity through existing intervening vegetation such as hedgerows, boundary trees, or garden planting resulting in a moderate adverse (significant) visual effect during the construction period. Birkin is partially located within Local Character Area (LCA) 13 Haddlesey Farmland which will experience a moderate adverse (significant) effect due to the reduction in openness and temporary change of land use from agricultural farmland, caused by the construction of Solar Development Sites 3 and 4 located in the western part of the LCA. Appropriate mitigation measures as outlined below will ensure the residents of Birkin do not experience additional significant effects as outlined in **Chapter 18 [APP-056]**.

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				As part of the assessment, appropriate mitigation measures have been developed and are incorporated into the Proposed Development. Measures to limit disruption during construction are secured in the **Outline Construction Environmental Management Plan (oCEMP) [APP-192]** and the **Outline Construction Traffic Management Plan (oCTMP) [APP-201]**. Requirement 12 in Schedule 2 to the **Draft Development Consent Order (DCO) [APP-017]** secures that a CEMP must be submitted to and approved by the relevant planning authority, and that the CEMP must be substantially in accordance with the **Outline CEMP [APP-192]**. All construction works must be carried out in accordance with the approved CEMP.
BPC-03	Birkin Parish	Transport and access	The Parish considers the highway and construction traffic impacts of the proposal to be severe and unacceptable.	An assessment of traffic impacts is presented in **ES Volume 1, Chapter 14: Traffic and Movement [APP-052]** which details the assessment undertaken and the likely significant effects of the Proposed Development on traffic and movement. The **Transport Assessment (TA) [APP-178]** has been prepared to assess the impact of the Proposed Development on the transport network during construction. The conclusions of the TA are set out in full in Section 7; overall, the TA concludes that any temporary impacts from the Proposed Development can be managed through the final Construction Traffic Management Plan (CTMP), and there is not expected to be any long-term significant impacts on the transport network. An **Outline Construction Traffic Management Plan (oCTMP, [APP-201])** has been prepared to identify the routes that should be used by construction traffic, based on the findings of the TA. These routes take into account the existing condition of the road and seek, where practicable, to avoid residential areas. The oCTMP also includes measures to minimise impacts during construction by reducing HGV movements during the peak hours and managing employee movements.
BPC-04	Birkin Parish	Transport and access	Heavy construction traffic associated with Site 4 and the Cable Route Corridor would inevitably pass through or close to the following constrained locations: the junction of Birkin Lane with Main Street; the junction of Roe Lane with Haddlesey Road; and the narrow, restricted-width bridge immediately adjacent to the Grade 1 Listed church. These routes are narrow, unlit, and were not designed for sustained HGV movements. They are heavily used by pedestrians, cyclists and equestrians, including children.	The Applicant notes this concern regarding the use of local roads. The **Transport Assessment (TA) [APP-178]** has been prepared to assess the impact of the Proposed Development on the transport network during construction. Construction traffic routes and access points have been developed to utilise the most appropriate sections of the highway network and to minimise use of constrained rural routes where practicable. Table 2-1 outlines the baseline traffic flows associated on assessed links. It shows that Roe Lane, Haddlesey Road / Birkin Road and Birkin Lane all accommodate HGV movements at present - each between 2-5% of total movements. Table 6-1 in the TA shows that there will be an average of 6 additional HGV movements per day associated with construction of the Proposed Development, which equates to an increase in composition of up to 30% when assessed as a worst-case scenario (i.e. all movements arriving by the same access route). However these percentages are exaggerated due to the low baseline HGV numbers on these links, and the absolute number of vehicles added to the network is low. The conclusions of the TA are set out in full in Section 7; overall, the TA concludes that any temporary impacts from the Proposed Development can be managed through the final Construction Traffic Management Plan (CTMP), and there is not expected to be any long-term significant impacts on the transport network. The referenced width restricted bridge on Intake Lane does not sit on any of the proposed access routes and will therefore not be impacted by traffic associated with the Proposed Development.

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				The Applicant reiterates its commitment to road safety, and notes that with implementation of the final version of the **Outline Construction Traffic Management Plan (oCTMP) [APP-201]**, roads should be no less safe than they currently are. Highway Improvement Areas (HIAs) have been identified where required to support the safe movement of construction traffic. HIAs are sections of the highway network where localised improvements are proposed, such as improvements to the road edge where it is deteriorated and provision of temporary passing places within the existing highways boundary, traffic management, and provision of visibility splays, or temporary highway and traffic works required to safely accommodate the Abnormal Indivisible Load (AIL) deliveries - including at the junction of Birkin Lane and Main Street. Any such alterations would be temporary in nature and would be implemented only where necessary for specific deliveries. All proposed highway works would be agreed in advance with the relevant highway authority and undertaken in accordance with their requirements. Details of these measures are set out in the **Abnormal Load Assessment** (Annex C of the **Transport Assessment (TA) [APP-178]**), and final arrangements would be secured through the detailed Construction Traffic Management Plan.
BPC-05	Birkin Parish	Transport and access	The Parish does not consider that routing agreements or traffic management plans can mitigate the inherent physical constraints of this network. The risk to public safety is unacceptable and justifies refusal.	The **Outline Construction Traffic Management Plan (oCTMP, [APP-201])** identifies the routes that should be used by construction traffic. The oCTMP also includes measures to minimise any impacts during construction by reducing HGV movements during the peak hours and managing employee movements. These routes take into account the existing condition of the road and seek, where practicable, to avoid residential areas. The Environmental Statement includes an assessment of fear and intimidation in **ES Volume 1, Chapter 14: Traffic and Movement [APP-052]**. Across all assessed links, there is no step change in the category of fear and intimidation as a result of the Proposed Development; all routes assessed experience the same level of fear and intimidation with the Proposed Development as in the baseline. The Applicant reiterates its commitment to road safety, and notes that with implementation of the final version of the **oCTMP [APP-201]**, roads would be no less safe than they currently are, hence the provision of Highway Improvement Areas (HIAs). HIAs are sections of the highway network where localised improvements are proposed, such as improvements to the road edge where it is deteriorated and provision of temporary passing places within the existing highways boundary, traffic management, and provision of visibility splays, or temporary highway and traffic works required to safely accommodate the Abnormal Indivisible Load (AIL) deliveries. While these measures will benefit construction traffic, including AILs, they will also enhance road safety and general usability for all road users; for example, the provision of passing places on narrower roads enabling regular and construction traffic to pass each other with ease.
BPC-06	Birkin Parish	Construction and decommissioning	The Parish is concerned that the application provides insufficient clarity on the size of the construction workforce, the duration of peak workforce presence, and where and how workers would be accommodated. Birkin, with approximately 100 residents, has no capacity to accommodate construction workers or	Based on construction information set out in **ES Volume 1, Chapter 2: The Proposed Development [APP-040]** the Proposed Development is expected to support approximately 520 net additional construction jobs over the build period (of which around 260 would be within the Study Area). Estimates are informed by professional experience of other solar projects and information provided by the Applicant, drawing on industry accepted methodologies tested through previous comparable projects. As with comparable Proposed Developments, employment numbers are indicative and

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			absorb associated pressures on housing, parking, services or amenity.	may vary slightly depending on detailed design, procurement and programme. Employment impacts have been assessed using established good practice methodologies, including the Homes and Communities Agency (HCA) Additionality Guide, with reference to HM Treasury Green Book principles. **ES Volume 1, Chapter 13: Socioeconomics [APP-051]** incudes an assessment of socioeconomic effects. The assessment assumes that 50% of workers would be drawn from the local area, meaning 50% would require temporary housing (231 persons). The socioeconomic assessment identifies that if the non-local workers required temporary accommodation, this would equate to 4% of the Selby Private Rented Sector (PRS) stock. This level of demand is considered absorbable within the existing rental market across Selby. However, if all non-local workers were to rely solely on tourism accommodation, this could place pressure on existing capacity, particularly during peak periods. The socioeconomic assessment concludes that the adverse effect on the PRS and hotel accommodation is considered to be negligible and not significant, when a mixed accommodation strategy (i.e. PRS and hotel) is applied.
BPC-07	Birkin Parish	Transport and access	Any assumption that workers would commute daily from accommodation elsewhere would materially increase traffic movements through Birkin and surrounding lanes, exacerbating risks at Birkin Lane/Main Street, Roe Lane/Haddlesey Road, and the single-file bridge by the church.	**ES Volume 1, Chapter 14: Traffic and Movement [APP-052]** presents the impact assessment undertaken for traffic and details the likely significant effects of the Proposed Development on traffic and movement. The **Transport Assessment (TA) [APP-178]** has been prepared to assess the impact of the Proposed Development on the transport network during construction, incorporating a worst-case scenario for workforce trips. Table 6-1 in the TA outlines the increase from the baseline traffic flows associated with construction on assessed links. It shows that Roe Lane, Haddlesey Road / Birkin Road and Birkin Lane would see an increase of between 21-51 vehicles per day on average during the construction period. This equates to increases between 14-22% on baseline flows, though these percentages are exaggerated due to the low baseline flows on these links, and the absolute number of vehicles added to the network is low. The conclusions of the TA are set out in full in Section 7; overall, the TA concludes that any temporary impacts from the Proposed Development can be managed through the final Construction Traffic Management Plan (CTMP), and there is not expected to be any long-term significant impacts on the transport network. An **Outline Construction Traffic Management Plan (oCTMP) [APP-201]** has been developed. A final Construction Traffic Management Plan (CTMP) will be developed by the appointed Principal Contractor (PC) prior to the commencement of construction. This will set out the measures to be implemented, including promoting lower carbon travel by communicating local public transport, pedestrian and cycle routes to construction staff. While the rural location and early shift patterns mean most workers are expected to travel by vehicle, the Proposed Development aims to reduce single-occupancy car journeys through the provision of shared minibus transport, encouraging car sharing, and providing secure cycle parking within the construction compounds.
BPC-08	Birkin Parish	Construction and decommissioning	The absence of a credible and clearly assessed workforce accommodation strategy further demonstrates that the impacts of the proposal on small rural communities have not been properly understood.	As the effects of the Construction Workforce have been judged to not be significant, a Construction workforce accommodation strategy is not considered necessary. **ES Volume 1, Chapter 13: Socioeconomics [APP-051]** incudes an assessment of socioeconomic effects. The assessment assumes that 50% of workers would be drawn

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			This unresolved uncertainty adds weight to the Parish's position that the application should be refused.	from the local area, meaning only 50% would require temporary housing (231 persons). The socioeconomic assessment identifies that if the non-local workers required temporary accommodation, this would equate to 4% of the Selby Private Rented Sector (PRS) stock, which is considered absorbable. Alongside this, the combined approach of using PRS as well as tourism accommodation to house the non-local workforce, as well as maximising use of local workers wherever possible will further contribute to ensuring the impact from construction workers on local rural communities will be negligible. Non-local workers will also be commuting in from across the Study Area, not one location, spreading out the potential impacts on traffic, amenity and housing. Further information on the potential traffic impacts can be found within **ES Chapter 14: Traffic and Movement [APP-052]**. As such, a Construction Worker Accommodation Strategy is not deemed necessary due to the low impact of construction workers on the local area.
BPC-09	Birkin Parish	Alternatives and Design Iteration, and Site Selection	Given Site 4's location on the northern edge of the River Aire, the Parish has serious concerns regarding flood risk, disturbance to drainage patterns, surface water runoff and soil compaction during and after construction. The Parish notes that Site 5 was removed from the Proposed Development following assessment identifying a high level of flood risk. The application does not adequately demonstrate why Site 4, which shares similar low-lying riverside characteristics, can safely proceed. Given Birkin's proximity and vulnerability, the Parish considers it inappropriate to accept residual uncertainty in this regard. The burden of proof lies squarely with the Applicant to demonstrate, with clear and compelling evidence, why Site 4 should be treated differently from Site 5. That case has not been made. The precautionary principle applies and, in the absence of such evidence, Site 4 should be refused on the same grounds as Site 5.	Please refer to the following two responses below for discussion on site selection and the flood risks at Solar Development Site 4 and the now-removed Solar Development Site 5. The potential effects of soil compaction during construction have been considered within the **Outline Drainage Strategy (ODS) [APP-182]**, the **Outline Construction Environmental Management Plan (oCEMP, [APP-192])** and the **Outline Operational Environmental Management Plan (oOEMP, [APP-193])** and appropriate measures to be implemented to manage this risk are included. Furthermore, the **Outline Construction Environmental Management Plan (oCEMP) [APP-192]** sets out good practice measures to avoid damage to soil structure, including measures to both minimise ground compaction and ensure remedial action is undertaken where ground is compacted. Utilising grass or wildflower cover will help to enhance interception and root growth, promoting effective rainwater infiltration and interception The **Outline Drainage Strategy (ODS) [APP-182]** sets out the Applicant's assessment of surface water runoff from the development including Solar PV areas. The solar panels are not expected to increase runoff volumes or peak runoff rates, or adversely affect time to peak, compared with pre-development conditions. Utilising grass or wildflower cover will help to enhance interception and root growth, promoting effective rainwater infiltration and interception. Case studies such as Ref. 20 within the **Outline Drainage Strategy (ODS) [APP-182]** indicate that where panels are installed above well-maintained grassland, changes in runoff volume and peak discharge are negligible. The same study demonstrates that ground cover is a key factor in controlling runoff, with well-managed vegetation helping to maintain drainage performance across solar array areas. Furthermore, the Proposed Development is in accordance with all relevant national standards and guidelines on the management of surface water, including NPS EN-3 on the management of runoff from solar panels. Furthermore, appropriate mitigation measures are proposed within the **Flood Risk Assessment (FRA, [APP-179])** and the **Outline Drainage Strategy (ODS) [APP-182]**

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				to ensure that surface water run-off or flood risk is not increased as a result of the development.
BPC-10	Birkin Parish	Water Resources and Flood Risk	Is there a flood risk assessment included with the planning application? Site is Flood Zone 2 and immediately adjacent to flood zone 3. On this basis, flooding should be a material planning constraint. Development should be avoided in flood-risk areas - especially where development could increase flood risk elsewhere. Development on land in flood zone 2, immediately adjacent to flood zone 3, would increase flood risk for Birkin village.	Flood risk from all relevant sources has been carefully considered within the **Flood Risk Assessment (FRA, [APP-179])**. The FRA assesses both the risk of flooding to the development itself and the potential effects of the Proposed Development on flood risk elsewhere, including from surface water runoff, in line with current planning policy and guidance including relevant climate change allowances. The Proposed Development has been informed by site-specific flood modelling and subsequent assessment to determine the impact of the proposals on existing flood risk, including development in the floodplain. The **FRA [APP-179]** confirms that Solar Development Site 5 was removed from the Order Limits of the Proposed Development partly due to flood risk reasons. The early assessment demonstrated that flood depths on this site largely exceeded 1m. In contrast, significantly lower flood depths are expected on Solar Development Site 4. Site 4 remains free from flooding in the design event, and Section 6.3 of the **FRA [APP-179]** reports that in the credible maximum scenario, depths are estimated to generally remain below the lowest panel edge in events up to and including the credible maximum scenario. Evidence provided within the flood risk assessments carried out for each Solar Development Site (see Annex A - Annex G of the FRA) demonstrates that the Proposed Development can be designed to be safe from flooding over its lifetime, considering the vulnerability of its users, and without increasing flood risk elsewhere. The assessment has been informed by consultation and engagement with the Environment Agency, Lead Local Flood Authority, and relevant Internal Drainage Boards. Furthermore, appropriate mitigation measures are proposed within the FRA and the **Outline Drainage Strategy (ODS) [APP-182]** to ensure that surface water run-off or flood risk is not increased as a result of the development. Flood risk was also one of many factors considered in the site selection process. This is discussed fully in **ES Volume 3, Appendix 3.1: Site Selection Assessment Report (SSAR) [AS-019]**.
BPC-11	Birkin Parish	Water Resources and Flood Risk	In addition, the sequential test must have been applied to ensure there are no reasonably available sites in lower risk areas (zone 1). As lower risk sites do exist, permission should be refused.	As the Applicant states above, a sequential approach has been applied to finding sites and informing the layouts of the Proposed Development. The Applicant followed a staged approach to site selection, taking into consideration a range of planning, environmental and operational factors and the project objectives, including flood risk. **ES Volume 1, Chapter 3: Alternatives and Design Iteration [APP-041]** and **ES Volume 3, Appendix 3.1: Site Selection Assessment Report (SSAR) [AS-019]** explains the methodology that has been applied when identifying and evaluating potential sites for the Proposed Development. It identifies a number of potential development areas for the Proposed Development that were considered as part of the site selection process and presents how each of those areas perform against a range of planning, environmental and operational constraints and opportunities and the project objectives. This report concludes that there are no more suitable and available locations within the search area than the proposed location for the Proposed Development, based on the criteria identified.

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				The Applicant identified a 25 km search radius around the Monk Fryston substation as the maximum viable cable connection distance for a solar project of this scale. The Applicant's **SSAR [AS-019]** confirms that, within that search area, no other sites were identified that are both entirely within Flood Zone 1, and suitable for the Proposed Development. The report goes on to explain how the Sequential Test was applied when considering site selection following that initial exercise. It concludes that, following the application of the Project Objectives and assessment criteria, the location of the Solar Development Sites is sequentially appropriate compared to other alternative locations. The SSAR concludes that the Proposed Development has passed the Sequential Test. Substations and BESS have been sequentially located in areas of lowest flood risk. The Applicant has committed to locating the substations and the BESS Compound within Flood Zone 1 and Flood Zone 2 only. These locations are outside the flood envelope associated with the 1 in 100-year plus climate change design flood event. The Proposed Development therefore satisfies the requirements of the Sequential Test.
BPC-12	Birkin Parish	Water Resources and Flood Risk	Surface water runoff change from solar arrays, increased access tracks and impermeable foundation pads with increase surface water runoff velocity and increase localised flooding – from which Birkin already suffers. The Light Valley Solar Proposed Development must prove they will not cause increased flood risk off-site. Being site on an active floodplain site (which regularly holds floodwater), this would lose essential floodplain storage land – a critical planning concern.	With reference to the submitted **ES Volume 3, Appendix 15.4: Outline Drainage Strategy (ODS) [APP-182]**, **Appendix 15.1: Flood Risk Assessment (FRA, [APP-179])** concludes that with that strategy in place, no surface water flood risk arises. Flood risk from all relevant sources has been carefully considered within the **FRA [APP-179]**. The FRA assesses both the risk of flooding to the development itself and the potential effects of the Proposed Development on flood risk elsewhere, including from surface water runoff, in line with current planning policy and guidance. The assessment has been informed by consultation and engagement with the Environment Agency, Lead Local Flood Authority, and relevant Internal Drainage Boards. Appropriate mitigation measures are proposed within the **FRA [APP-179]** and the **Outline Drainage Strategy (ODS) [APP-182]** to ensure that surface water run-off or flood risk is not increased as a result of the development. The Proposed Development has been informed by site-specific flood modelling and subsequent assessment to determine the impact of the proposals on existing flood risk, including development in the floodplain. The **FRA [APP-179]** concludes that the Proposed Development can operate safely over its lifetime, including under climate change sensitivity testing, and will not increase flood risk to nearby receptors. Any potential floodwater displacement effects are assessed as negligible under conservative assumptions. Section 9 of the **FRA [APP-179]** provides a summary of the assessment conclusions, stating that that the primary source of flood risk to the Proposed Development is from fluvial flooding. Other sources of potential flood risk to the development include surface water and groundwater flooding, which are considered further on a site-by-site basis in Annex A – Annex H of the FRA. The Applicant has and continues to engage with key stakeholders on issues related to flood risk and drainage.

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				The **Outline Drainage Strategy (ODS) [APP-182]** sets out the Applicant's assessment of surface water runoff from the Solar PV areas. The solar panels are not expected to increase runoff volumes or peak runoff rates, or adversely affect time to peak, compared with pre-development conditions. Utilising grass or wildflower cover will help to enhance interception and root growth, promoting effective rainwater infiltration and interception. Case studies such as Ref. 20 within the ODS **[APP-182]** indicate that where panels are installed above well-maintained grassland, changes in runoff volume and peak discharge are negligible. The same study demonstrates that ground cover is a key factor in controlling runoff, with well-managed vegetation helping to maintain drainage performance across solar array areas. Furthermore, the Proposed Development is in accordance with all relevant national standards and guidelines on the management of surface water, including NPS EN-3 on the management of runoff from solar panels
BPC-13	Birkin Parish	Water Resources and Flood Risk	Light Valley Solar Proposed Development must prove they will not cause increased flood risk off-site. Being site on an active floodplain site (which regularly holds floodwater), this would lose essential floodplain storage land – a critical planning concern.	These points are considered in the previous response above.
BPC-14	Birkin Parish	Agricultural Land and Soils	The damage during the non-insignificant construction stage must also be considered, soil compaction from heavy machinery (reducing soil infiltration), creation of haul roads, stockpiling of materials (altering water run off).	The potential effects of soil compaction during construction, the impacts of the creation of haul roads, and stockpiling of soils to prevent contaminants and impacts on water bodies have all been considered within the **Outline Drainage Strategy (ODS) [APP-182]** and the **Outline Construction Environmental Management Plan (oCEMP, [APP-192])** which considers appropriate construction-phase measures to be implemented to manage this risk. Furthermore, the **Outline Soil Resource Management Plan (oSRMP) [APP-203]** sets out good practice measures to avoid damage to soil structure, including measures to both minimise ground compaction and ensure remedial action is undertaken where ground is compacted. Utilising grass or wildflower cover will help to enhance interception and root growth, promoting effective rainwater infiltration and interception. The potential effects of soil compaction during construction have been considered within the **Outline Drainage Strategy (ODS) [APP-182]** and the **Outline Construction Environmental Management Plan (oCEMP, [APP-192])** which considers appropriate construction-phase measures to be implemented to manage this risk. Furthermore, the **Outline Soil Resource Management Plan (oSRMP) [APP-203]** sets out best practice measures to avoid damage to soil structure, including measures to both minimise ground compaction and ensure remedial action is undertaken where ground is compacted.
BPC-15	Birkin Parish	Landscape and visual	The Parish considers that Site 4 would fundamentally alter the character of Birkin's setting, replacing open riverside farmland with an industrialised landscape of solar arrays, fencing, access tracks, substations, inverter infrastructure and security measures.	The Applicant acknowledges that the Proposed Development would introduce changes to the character of parts of the landscape and to some views. It is recognised through NPS EN-1 which states in Section 5.10 that '*virtually all nationally significant energy infrastructure projects will impact the landscape*"'. It should be noted that with proposed mitigation in place and following initial establishment, landscape and visual impacts will generally reduce over time. Mitigation measures include substantial new planting, reinforcement of existing

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				vegetation, careful siting of infrastructure, and minimisation of lighting to avoid unnecessary urbanising effects. While landscape mitigation takes time to establish, the LVIA demonstrates that by Year 15 of operation, once planting has matured, the majority of landscape and visual effects would reduce and would not be significant. Mitigation measures are shown on the **Outline Environmental Masterplans (OEM) [PDA-003 to PDA-010]** and are secured via the **Works Plans [AS-004]**, **Outline Landscape and Ecological Management Plan (oLEMP) [APP-195],** and the **Design Parameters and Commitments document [APP-217].** The changes to the landscape character are included in **ES Volume 1, Chapter 10: Landscape and Visual [APP-048]** with detailed baseline and effect assessments provided in **ES Volume 3, Appendix 10.2: Landscape Baseline and Effects [APP-168].** Birkin's landscape character is represented by LCA 7: Aire Valley and LCA 13: Haddlesey Farmland, both of which are assessed. Impacts on LCA 7 would be very limited and localised, as no solar development areas are located within the character area. LCA 13, within which Solar Development Sites 3 and 4 are located, would experience the most direct and notable landscape effects. Moderate adverse (significant) effects are predicted during construction due to the introduction of temporary construction activity and plant. However, effects would reduce through operation and, following the establishment of mitigation planting, are assessed as minor adverse and not significant at Year 15 of operation, with the development becoming partially integrated into the landscape. While the setting of Birkin was not specifically included as a receptor, the setting of St Mary's Church in included in **ES Volume 1, Chapter 8: Cultural Heritage [APP-046].** The assessment concludes that the works will at most result in a minor adverse impact which will result in a minor adverse significance of effect which is not significant (paragraph 8.9.48).
BPC-16	Birkin Parish	Landscape and visual	The scale and proximity of development mean that mitigation planting cannot realistically preserve the rural character of the village or its setting. The harm would be long-term and effectively irreversible.	The Applicant notes the concerns regarding the scale of the Proposed Development and effectiveness of proposed visual mitigation measures. The Proposed Development has been designed to maximise the energy generation benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects. The Applicant acknowledges that the Proposed Development would introduce changes to the character of parts of the landscape and to some views. However, the LVIA concludes that, with embedded and additional mitigation, the resulting effects would be localised, reversible and would reduce over time. This approach is consistent with paragraph 5.10.5 of the Overarching National Policy Statement for Energy (NPS EN 1), which recognises that *"virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape,"* while also acknowledging that beneficial landscape character effects may arise through mitigation. Visual mitigation measures include substantial new planting, reinforcement of existing vegetation, careful siting of infrastructure, and minimisation of lighting to avoid unnecessary urbanising effects. While landscape mitigation takes time to establish, the LVIA demonstrates that by Year 15 of operation, once planting has matured, the majority of landscape and visual effects would reduce to minor or non-significant levels. These are shown on the **Outline Environmental Masterplans (OEM) [PDA-003 to PDA-010]** and are secured via the **Works Plans [AS-004]** and **Outline Landscape and Ecological Management Plan (oLEMP) [APP-195]**.

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				Section 5.1 of the **oLEMP [APP-195]** details the programme of maintenance and monitoring of planted screening throughout the operation of the Proposed Development. Further mitigation measures relating to construction and decommissioning are set out in Chapter 10, Section 10.10, and are secured via the **Outline Construction Environmental Management Plan (oCEMP) [APP-192]** and the **Outline Decommissioning Environmental Management Plan (oDEMP) [APP-194]**, respectively.
BPC-17	Birkin Parish	Cultural heritage	Birkin's historic environment, including the Grade I-listed Church of St Mary and its surrounding historic landscape, is highly sensitive to change.	The Applicant acknowledges this concern and can confirm that Church of St Mary was included in a full assessment of potential impacts on listed buildings has been carried out within **ES Volume 1, Chapter 8: Cultural Heritage [APP-046]**, including a site walkover and a settings assessment. The Church of St Mary is graded as high importance within Chapter 8. The church is located immediately adjacent to an area of AIL access works. The proposed works are likely to be limited to the temporary removal of street furniture. Views to the construction activities and solar infrastructure at Solar Development Site 4 would be glimpsed only as the church is heavily screened by intervening built form. The assessment within Chapter 8 concludes the works will at most result in a minor adverse impact which will result in a minor adverse significance of effect which is not significant. **ES Volume 1, Chapter 8: Cultural Heritage [APP-046]** states that landscape mitigation and planting undertaken as part of the construction phase will reach maturity during the operation phase to reduce visibility of the Proposed Development from heritage assets.
BPC-18	Birkin Parish	Cultural heritage	The Parish's concern relates not only to direct impacts on heritage assets, but to the erosion of their setting and significance. The industrialisation of adjacent land would cause lasting harm that cannot be satisfactorily mitigated.	The historic core of Birkin is located to the west of Solar Development Site 4 and no assets will experience direct physical impacts as a result of the Proposed Development. **ES Volume 1, Chapter 8: Cultural Heritage [APP-046]** has assessed that no significant effects will arise from changes in the setting of heritage assets, however construction activities may be visible from heritage assets (buildings identified on the first edition Ordnance Survey).
BPC-19	Birkin Parish	Cultural heritage	The Parish also draws the Examining Authority's attention to the war grave site between Birkin and West Haddlesey, marking the location where two Halifax bombers crashed during the Second World War. This site carries deep historic significance and represents a place of solemn community memory. The proposed industrialisation of the surrounding fields risks physical disturbance to this site and is fundamentally incompatible with its character as an informal memorial. The application does not adequately address the presence or sensitivity of this asset.	Whilst not a designated heritage asset, military crash sites are protected under Protection of Military Remains Act 1986 with all potential crash sites included within the Site Gazetteer and Statements of Significance/Impact Assessments. This site involved a mid-air collision between two aircraft (Serial nos. NA609 and MZ633) resulting in the total loss of 27 lives including 13 ground crew. Both sites are recorded on the NYHER (MNY26980, MNY26979). The approximate crash sites are located outside of the Order Limits (344m and 262m east, respectively) and the field to the immediate east of the crash sites will not contain any solar panels. The assessment of impact was informed by comprehensive geophysical survey and archaeological trial trenching of Site 4, which did not reveal any evidence of aircraft debris. Taking into account the mid-air nature of the collision and results of prospection surveys, the assessment concluded that the Proposed Development would likely result in **no**

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				change and returned a Neutral Effect, which is not significant as set out in **ES Volume 1, Chapter 8: Cultural Heritage [APP-046]**.
BPC-20	Birkin Parish	Alternatives and Design Iteration, and Site Selection	The Parish is concerned that key elements of the proposal rely on illustrative layouts and outline parameters, including panel density, fencing, lighting, CCTV and infrastructure locations. This lack of certainty prevents proper assessment of worst-case impacts and undermines confidence that the Proposed Development could be adequately controlled if consent were granted. A Development Consent Order of this scale and permanence cannot appropriately be granted on the basis of illustrative parameters. The Examining Authority should require fixed and binding specifications before any consent could be contemplated.	The EIA presented within the ES has been undertaken adopting the principles set out in the Planning Inspectorate's Advice Note Nine: Rochdale Envelope which provides guidance regarding the degree of flexibility that may be considered appropriate within an application for development consent under the Planning Act 2008. **Environmental Statement Volume 1, Chapter 2: The Proposed Development [APP-040]** and the **Design Parameters and Commitments document [APP-217]** set out for each technical discipline, the maximum (and where relevant, minimum) parameters for the elements where flexibility needs to be retained have been assessed under the Rochdale Envelope approach. The approach also recognises that the worst-case parameter for one technical assessment may differ from another, ensuring that worst case overall impacts are predicted. The maximum lateral spatial extents are shown on the **Works Plans [AS-004].** These parameters are not illustrative – they are set and secured via the DCO. The Applicant's approach is consistent with DCO practice for all project types. Each technical chapter (**ES Volume 1, Chapter 5 [APP-043] to Chapter 16 [APP-054]**) considers the parameters relevant to their assessment.
BPC-21	Birkin Parish	Construction and decommissioning	The Parish is not persuaded that the application provides sufficient assurance regarding long-term maintenance, repowering, full land restoration, or financial security for decommissioning.	Information on decommissioning activities is provided within the **Environmental Statement (ES) [APP-038 to APP-190]** and within the **Outline Decommissioning Environmental Management Plan (oDEMP) [APP-194]**. At the end of the Proposed Development's operational life, a Decommissioning Environmental Management Plan, in substantial accordance with the **oDEMP [APP-194]** will be implemented for decommissioning works. This will provide for the removal of infrastructure and the restoration of the land to its former use, as secured via the DCO. The operation and maintenance of the Proposed Development have been assessed throughout the **ES [APP-038 to APP-190]** which considers operational effects, including general maintenance and replacements, across relevant topic areas. As part of the assessment, appropriate mitigation measures are incorporated into the Proposed Development and secured through the DCO and associated management plans. Failure to comply with these measures would be a criminal offence. As set out in the **Funding Statement [APP-021]**, the Applicant has sufficient access to funds to fund operation and decommissioning activities.
BPC-22	Birkin Parish	Construction and decommissioning	The Parish notes that solar panels typically require replacement every 15 to 25 years, yet the application seeks consent for an operational lifespan of up to 60 years. This means that communities could face a full recurrence of construction disruption — including HGV movements, ground works and associated damage to hedgerows, habitats and road surfaces — before any decommissioning takes place. Mitigation planting	During the 60-year operational life of the Proposed Development it is expected that there will be a requirement for periodic replacement of some of the electrical infrastructure. **ES Volume 1, Chapter 2: The Proposed Development [APP-040]** sets out the assumptions for the replacement activities. Solar PV panels re expected to have an operational life of approximately 40 years or more, with all panels anticipated to be replaced once during the operational phase. Replacement would be undertaken over a period of up to 12–24 months and would be in a phased manner.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
			offered as part of the original consent would not yet have matured, rendering it ineffective at the point of greatest need.	This has formed the basis of the assessments for the operational phase throughout the ES, and no likely significant effects have been identified for that phase. As set out in **ES Volume 1, Chapter 14: Traffic and Movement [APP-052]** and **ES Volume 3, Appendix 14.1: Transport Assessment (TA) [APP-178]**, replacement traffic is expected to be lower than traffic that would be generated by the construction phase. The Cable Route Corridor is the largest overall trip generator for the Proposed Development and the associated traffic would not be needed during the replacement activities.
BPC-23	Birkin Parish	Construction and decommissioning	The Parish is also not satisfied that there is a legally binding and financially secured obligation on the developer to fully decommission and restore the land at the end of the project's life. Without such a bond, the public and future generations may be left to bear the cost of removing industrial infrastructure from what is currently high-grade agricultural land. Renewable energies require a maintenance and life cycle accountability; this exists in the nuclear energy sector and should be applied as much in the solar energy sector.	Information on decommissioning activities is provided within the **Environmental Statement (ES) [APP-038 to APP-190]** and within the **Outline Decommissioning Environmental Management Plan (oDEMP) [APP-194]**. At the end of the Proposed Development's operational life, a Decommissioning Environmental Management Plan, in substantial accordance with the **oDEMP [APP-194]** will be implemented for decommissioning works. This will provide for the removal of infrastructure and the restoration of the land to its former use, as secured via the DCO. As part of the assessment, appropriate mitigation measures are incorporated into the Proposed Development and secured through the DCO and associated management plans. Failure to comply with these measures would be a criminal offence. As set out in the **Funding Statement [APP-021]**, the Applicant has sufficient access to funds to fund decommissioning activities.
BPC-24	Birkin Parish	Biodiversity and Ecology	The Parish does not accept that claims of biodiversity net gain adequately offset the harm this proposal would cause to established ecosystems and wildlife corridors. Construction activity on this scale inevitably causes immediate and significant disturbance to habitats, soil structure and wildlife. The long-term modelling used to support net gain assessments cannot substitute for the loss of undisturbed land during the construction and early operational phases, and any claimed gains are contingent on management commitments that extend well beyond the realistic oversight horizon of planning conditions.	Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 6: Biodiversity [APP-044]** and **ES Volume 1, Chapter 12: Ornithology [APP-050]**. The Applicant has followed a robust environmentally led design process taking account of the mitigation hierarchy. This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the Proposed Development. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. ES Chapters 6 and 12 consider baseline conditions and evaluate likely effects during construction, operation and decommissioning. The assessment identifies embedded and additional mitigation measures and concludes that, with these measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated. A comprehensive package of habitat retention, creation, enhancement and long-term management measures is proposed to avoid, reduce and mitigate impacts and to deliver Biodiversity Net Gain. These include the protection of existing habitats, creation of new habitats, and long-term ecological management to improve habitat quality over the lifetime of the Proposed Development.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				The ecological mitigation and enhancement proposals, including BNG measures, are illustrated on the **Outline Environmental Masterplans (OEM) [PDA-003 to PDA-010]**, detailed in the **Outline Landscape and Ecological Management Plan (oLEMP) [APP-195]** and the **Outline Bird Mitigation Area Management Plan (oBMAMP) [APP-205]**. The **oLEMP [APP-195]** includes provisions for habitat establishment, maintenance and ecological monitoring to confirm that mitigation and enhancement measures are functioning as intended and to identify and implement remedial measures where required. It is expected that the Proposed Development will have a gain of approximately 70% Habitat BNG, including 78.58% for habitats, 73% for hedgerows, and 10.42% for watercourses based on the current development proposals. Full details of the gain are set out in the **Biodiversity Net Gain (BNG) Report [APP-220]**. The preparation, approval and implementation of a detailed Landscape and Ecological Management Plan and BNG Strategy, substantially in accordance with the **oLEMP [APP-195]**, is secured through the **Draft Development Consent Order (DCO) [APP-017]**, ensuring that ecological mitigation and enhancement measures (including BNG) are delivered, monitored and maintained throughout the lifetime of the Proposed Development.
BPC-25	Birkin Parish	The Proposed Development and DCO Process	The Parish draws the Examining Authority's attention to a matter of strategic incoherence in national policy. The UK government is currently investing approximately £60 million in Solar Radiation Modification (SRM) research, which is directed at reducing the intensity of sunlight reaching the Earth's surface as a response to climate change. Scientific modelling indicates that successful SRM deployment could reduce photovoltaic panel efficiency by between 2% and 12%. The Parish does not contend that this alone is determinative but considers it relevant that the government is simultaneously funding research that would materially degrade the generating capacity of the very infrastructure it is consenting. This represents a failure of strategic alignment that the Examining Authority should weigh when considering whether the balance of public interest favours approval of a Proposed Development of this scale and irreversibility.	The Applicant first notes that it is not the role of individual planning decisions to question national policy. This has been consistently emphasised in Court decisions. The national policy which exists is the National Policy Statement for Energy EN-1 which recognises new solar development as a critical national priority. That is the policy against which the Proposed Development is judged, and it is that which the Secretary of State will take into account. The **Statement of Need [APP-214]** sets out in full the need and justification for the Proposed Development. The Statement of Need describes the Government's policy that large capacities of low carbon generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants, and that *"a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar"*. The Overarching National Policy Statement for Energy EN-1 (December 2025) states that that the UK has huge potential for solar power and that solar energy is at the heart of the Clean Power 2030 Mission [Paras 3.3.23 & 3.3.24]. NPS EN-1 further confirms that there is an urgent need for renewable energy generation that is a critical national priority [para 3.3.62 & 3.3.63]. The Proposed Development therefore directly contributes towards meeting the national net zero and energy security requirements for the near future.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
Sherburn in Elmet Town Council				
SETC-01	Sherburn in Elmet Town Council	Transport and access	The Council is concerned that the transport-sensitivity assessment omits the B1222 and A162, both of which are critical links for Sherburn. For reference, North Yorkshire Council's traffic counters recorded an average of more than 12,000 vehicle movements per day on the A162 in April 2025. We request that these routes are included within the Applicant's road sensitivity assessments and that cumulative impacts from this development are assessed alongside both existing and approved/expected industrial and residential growth. We would welcome an assessment from NY/National Highways based on the data available from NY Council.	The Applicant notes this comment. The **Transport Assessment (TA) [APP-178]** has been prepared to assess the impact of the Proposed Development on the transport network during construction. Both the B1222 and the A162 are assessed within the Transport Assessment - links 21 and 22. The assessment does not identify any existing safety or operational issues on these sections of the network, with no evidence of accident clustering or underlying highway safety concerns. These routes have also been included within the assessment of construction traffic impacts and the cumulative assessment, further detailed within Section 6 of the TA. The mentioned road links would each see a less than 1% temporary increase in daily movements during the construction phase, with increases in HGVs less than 3% on each. The conclusions of the TA are set out in full in Section 7; overall, the TA concludes that any temporary impacts from the Proposed Development can be managed through the final Construction Traffic Management Plan (CTMP), and there is not expected to be any long-term significant impacts on the transport network. The Applicant therefore considers that these routes have been appropriately assessed within the TA.
SETC-02	Sherburn in Elmet Town Council	Transport and access	Secondly, we are concerned that requirements to deliver improvements at the Monk Fryston roundabout (A63/A162) are non-committal at this stage. The delivery of capacity and safety improvements must be secured via a planning condition, with works completed before construction begins. Previous Proposed Developments have promised similar upgrades which were later diluted or abandoned, and this must not happen again.	The Applicant has been engaging with the NYC highways team in regard to proposed improvements to this roundabout. NYC Highways have advised that design work is already underway for improvements to this roundabout to provide additional capacity for a range of committed developments within the surrounding area. These improvements are being implemented by NYC Highways as their project and it is anticipated that these works will be completed by 2028. As a NYC project these improvements will be brought forward independently of the Proposed Development. If these are not delivered in time to benefit the Proposed Development, the additional trips generated would represent a small proportionate increase only and would not change the conclusions of the ES. Nevertheless, construction vehicles could be directed to take alternative routes, as set out in Section 3.7 of the **Outline Construction Traffic Management Plan (oCTMP) [APP-201]**.
SETC-03	Sherburn in Elmet Town Council	Alternatives and Design Iteration, and Site Selection	Paragraph 160 of the National Planning Policy Framework states that large-scale energy development within the Green Belt is inappropriate unless "very special circumstances" exist. Why can less harmful sites outside the Green Belt not accommodate the proposed Proposed Development?	The Applicant acknowledges this comment. The NPPF does provide substantial weight to the harm of green belt and that inappropriate development should only be approved where there are very special circumstances. In December 2024 a change was made to Green Belt Policy including the concept of Grey Belt Land. As set out in the **Planning Statement [APP-207]** and **Planning Statement Appendix 2: Grey Belt Assessment [APP-209]** the Applicant considers that the land within the Order Limits is considered to be grey belt. Notwithstanding this, it would meet the requirement for Very Special Circumstances due to its status as Critical National Priority Infrastructure. The Site Selection Assessment Report **(SSAR, ES Volume 3, Appendix 3.1 [AS-019])** sets out how green belt was considered within the site selection process. The Initial search disregarded land within the green belt however as there were insufficient land

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				identified to meet the requirements of the project. As set out in the Planning Statement as well as the Site Selection Assessment Report, planning policy for green belt is nuanced and it does not entirely preclude development in these areas. Whilst the proposed Solar Development Sites include 19% green belt (noting the paragraph above regarding this being grey belt), this has been balanced against other constraints including agricultural land classification, flood risk, ecology and biodiversity, landscape and visual and cultural heritage. Each alternative has also been assessed for its ability to achieve the Project Objectives. It is considered that, when these factors are balanced, there are no more suitable and available locations within the search area than the location for the Proposed Development, based on the Project Objectives and the criteria applied.
SETC-04	Sherburn in Elmet Town Council	Alternatives and Design Iteration, and Site Selection	Consistent with our first response to the North Yorkshire Local Plan, the Town Council's preference is for rooftop, carpark and industrial-estate solar to be maximised before high-quality agricultural land or Green Belt is utilised. Where it is avoidable through alternative options, agricultural land should not be used. While we recognise that current planning policy does not mandate this, for local transparency we urge the Applicant to publish how much suitable roof space and previously developed land has been deemed unviable, or whether this avenue has been explored at all.	In regard to rooftops, the national policy and government guidance, as set out in the **Statement of Need [APP-214]** recognise that while rooftop and smaller scale solar installations are an important part of the energy mix, they cannot alone meet the scale of capacity required to achieve clean power and net zero objectives. Large scale ground mounted solar therefore remains necessary in addition to, not instead of, rooftop solar. As explained in **ES Volume 3, Appendix 3.1: Site Selection Assessment Report (SSAR) [AS-019]**, the Applicant considered a number of factors in selecting the site including the agricultural land classification, greenbelt and brownfield land availability.
SETC-05	Sherburn in Elmet Town Council	Landscape and visual	We are concerned that parts of the proposal lie too close to existing settlements and, in some cases, result in the complete isolation of individual homes. We therefore ask that the genuine concerns of residents and this Council are taken into consideration for any final Proposed Developments put forward. For example, the current plans show individual and smaller collections of properties encircled by panels, in cases even forcing some residents to drive through installations to reach their homes. We urge the Applicant to take these concerns seriously, reconsidering the thresholds used to determine proximity to residential dwellings. It is our view that buffers must be increased so that no household is left functionally isolated.	The Applicant acknowledges the concern regarding the proximity of the Proposed Development to residential properties. The **Design Approach Document (DAD) [APP-216]** establishes clear principles for the siting of infrastructure, including the avoidance of unacceptable effects on residential amenity and the retention of appropriate separation from properties through embedded design measures. In line with these principles, the layout has been iteratively refined to incorporate setbacks from residential receptors, retention of existing field boundaries, and the use of offsets to PRoW and properties, alongside the integration of additional mitigation planting, including hedgerow reinforcement and new woodland belts, to filter and soften views. Where properties are in closer proximity, the design includes localised landscape buffers and planting proposals to maintain visual separation, avoid overbearing and minimise enclosing effects. Mitigation measures are shown on the **Outline Environmental Masterplans (OEM) [PDA-003 to PDA-010]** and are secured via the **Works Plans [AS-004]**, **Outline Landscape and Ecological Management Plan (oLEMP) [APP-195]**, and the **Design Parameters and Commitments document [APP-217]**. The Applicant included the assessment of the landscape and visual effects (LVIA) of the Proposed Development within **ES Volume 1, Chapter 10: Landscape and Visual [APP-048]**. No views have been identified from within the settlement of Sherburn in Elmet. The LVIA confirms that, while some visual receptors may experience views of

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				the Proposed Development from the eastern part of the parish (VP49), these are typically partial, filtered or experienced sequentially, rather than resulting in continuous enclosure, and mitigation planting is predicted to substantially reduce perceptions of proximity over time. Access to properties would be maintained via the existing road network, and the design does not result in the physical isolation of residential dwellings. By year 15 of operation, these effects are predicted to be not significant.
SETC-06	Sherburn in Elmet Town Council	Community benefit	Under current legislation and energy market functions, Proposed Developments such as this deliver little-to-no benefit in terms of cost savings locally (this is due to energy markets being largely governed by wholesale gas prices, regardless of source). While we appreciate that individual Proposed Developments cannot address this pricing flaw, to foster genuine community buy-in we would always encourage Proposed Developments such as this to demonstrate transparently that every reasonable step has been taken first to avoid and, where avoidance is impossible, to minimise and locally offset the Proposed Development's residual impacts. Such opportunities include community energy Proposed Developments, rather than national-grid first approaches.	The Applicant is committed to providing a Community Benefit Fund to allow for community driven benefits that are not necessarily associated with the Proposed Development itself as the Applicant agrees that the communities closest to the project should benefit from it. As a low cost form of energy generation connected to the electricity transmission network, it will contribute to lowering the cost of energy for all including those locally. The Applicant will continue to engage locally to shape a community Benefit Fund that works for the community.
SETC-07	Sherburn in Elmet Town Council	Biodiversity and Ecology	The Council will look to responses from Natural England, NYC's Ecologist and other statutory consultees regarding the environmental impacts of any final Proposed Development, including impacts on protected species, wildlife, soils, water management.	The Applicant notes this comment.
Chapel Haddlesey Parish Council				
CHPC-01	Chapel Haddlesey Parish Council	Transport and access	Chapel Haddlesey Parish Council are concerned about the amount of construction related vehicles passing through Chapel Haddlesey.	The Applicant acknowledges the concern regarding the potential increase in construction-related vehicle movements through the village of Chapel Haddlesey. **ES Volume 1, Chapter 14: Traffic and Movement [APP-052]** presents the impact assessment undertaken for traffic and movement and considers the likely significant effects of the Proposed Development. As detailed in the **Transport Assessment (TA) [APP-178],** assessments have been undertaken to consider the effects of both construction and operational traffic on the local highway network and nearby residential areas, including the A19 in the vicinity of Chapel Haddlesey. Table 6-1 in the TA outlines the increase from the baseline traffic flows associated with construction on assessed links. It shows that A19 at of Chapel Haddlesey (link 'DfT3') will see a 1% increase in both total vehicles and in the number of HGVs. The findings of the TA, set out in full in Section 7, inform the approach to managing construction traffic. While the Applicant recognises local concerns regarding construction vehicle movements, the TA concludes that any temporary construction-related impacts can be appropriately managed through the implementation of a final Construction Traffic Management Plan (CTMP), which will be secured by requirement and agreed with the local highway authority prior to commencement. An **Outline Construction Traffic Management Plan (oCTMP) [APP-201]** has been prepared to identify the routes that should be used by construction traffic, based on the

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				findings of the TA. This includes construction activities associated with cable installation works in the vicinity of Chapel Haddlesey, where temporary access to the north of the settlement will be required to deliver materials and facilitate construction. These routes take into account the existing condition of the road and seek, where practicable, to avoid residential areas. The oCTMP also includes measures to minimise impacts during construction by reducing HGV movements during the peak hours and managing employee movements.
West Haddlesey Parish Meeting (Also submitted by Jackie Hume as RR-581)				
WHPM-01	West Haddlesey Parish Meeting	Landscape and visual	The project covers over 3000 acres of productive agricultural land with Site 4, nearest to our village of West Haddlesey, being the largest site at over 700 acres and individually one of the largest single areas of solar panels in the UK if approved. We consider this is totally out of keeping with this rural area. The large-scale industrialisation of our area will dominate and permanently change the character of the area for our current residents and generations to come.	The Applicant acknowledges that the Proposed Development would introduce changes to the character of parts of the landscape and to some views. This must be placed in the context of NPS EN-1, that further confirms that there is an urgent need for renewable energy generation that is a critical national priority [para 3.3.62 & 3.3.63]. The Proposed Development therefore directly contributes towards meeting the national net zero and energy security requirements for the near future. The LVIA concludes that, with embedded and additional mitigation, the resulting effects would be localised, reversible and would reduce over time. This approach is consistent with paragraph 5.10.5 of the Overarching National Policy Statement for Energy (NPS EN 1), which recognises that "*virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape*," while also acknowledging that beneficial landscape character effects may arise through mitigation. As per the description set out in **ES Volume 1, Chapter 2: The Proposed Development [APP-040]**, the 'Solar Development Sites' comprise approximately 900 ha of land. Around 680 ha of this land is proposed as being required for installation of solar PV panels and associated infrastructure. The remaining 220 ha would provide areas dedicated to ecological mitigation, measurable Biodiversity Net Gain (BNG) delivery, landscaping, offsets and agricultural land managed for environmental enhancement and habitat creation. While the introduction of solar infrastructure would alter the character of parts of the Site, the embedded mitigation ensures that effects would be localised and would reduce over time as planting establishes, rather than constituting permanent industrialisation of the land.
WHPM-02	West Haddlesey Parish Meeting	Transport and access	The main access route for the HGVs and construction workers for Site 4 is proposed to come off the A19 crossroads, travelling directly through part of Chapel Haddlesey and all of West Haddlesey and along Birkin Road. The construction period is expected to last for 3 years.	The Applicant makes note of this comment and refers the Parish Council to **ES Volume 1, Chapter 14: Traffic and Movement [APP-052]**, Table 14-20 where the forecast construction period for Solar development Site 4 is estimated to be 751 days, or 2 years. Please also note **ES Volume 2, Figure 14.4: Construction Routing [APP-113]** which shows access to Solar Development Site 4 is also proposed to be taken via Roe Lane.
WHPM-03	West Haddlesey Parish Meeting	Transport and access	The West Haddlesey Parish meeting considers that, with respect to the proposed construction route to Site 4, the LVS documents are fundamentally flawed and not fit for purpose.	The Applicant makes note of this comment and disagrees for the reasons set out in these responses.
WHPM-04	West Haddlesey Parish Meeting	Transport and access	LVS have been unable to provide a breakdown of the existing baseline data broken down by HGV type nor are LVS able to provide information on the construction	The Applicant notes this comment. The **Transport Assessment (TA) [APP-178]** has been prepared to assess the impact of the Proposed Development on the transport network during construction. The conclusions of the TA are set out in full in Section 7;

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			traffic by HGV category. This is considered a critical area for clarification given that a 7.5-tonne delivery van and a 44-tonne articulated lorry are manifestly different on their impacts on village residents, road users and road infrastructure but are currently indistinguishable in the data presented.	overall, the TA concludes that any temporary impacts from the Proposed Development can be managed through the final Construction Traffic Management Plan (CTMP), and there is not expected to be any long-term significant impacts on the transport network. Baseline traffic data presented within the Transport Assessment has been collected through site-specific traffic surveys and supplemented with Department for Transport data, in line with standard industry practice. These data sources typically classify vehicles by broad category, including HGVs, rather than providing detailed breakdowns by vehicle type. The assessment of construction traffic impacts follows established methodologies used for nationally significant infrastructure projects, with HGV movements forecast based on comparable developments and robust worst-case construction assumptions. Impacts are assessed based on total traffic and HGV flows, including percentage changes relative to baseline conditions, which is the accepted approach within the relevant guidance. Vehicle type would be determined on panel choice and configuration at detailed design stage but it is unlikely that the HGV movements for the Proposed Development would be made up only of 44-tonne articulated lorries. The Applicant reiterates its commitment to road safety, and notes that with implementation of the final version of the **Outline Construction Traffic Management Plan (oCTMP) [APP-201]**, roads should be no less safe than they currently are. Highway Improvement Areas (HIAs) have been identified where required to support the safe movement of construction traffic. HIAs are sections of the highway network where localised improvements are proposed, such as improvements to the road edge where it is deteriorated and provision of temporary passing places within the existing highways boundary, traffic management, and provision of visibility splays, or temporary highway and traffic works required to safely accommodate the Abnormal Indivisible Load (AIL) deliveries. While these measures will benefit construction traffic, including AILs, they will also enhance road safety and general usability for all road users; for example, the provision of passing places on narrower roads enabling regular and construction traffic to pass each other with ease.
WHPM-05	West Haddlesey Parish Meeting	Transport and access	In addition, the baseline number of HGVs in the LVS Traffic and Movement Plan document is incorrect – LVS have confirmed, after a written request for clarification, to the Parish Meeting that the correct baseline flow for the route is 9 HGVs per day (approximately 3% of total traffic) rather than the 50 HGVs per day (14%) currently in their document. Therefore, the impact of HGV construction traffic is significantly greater than the normal baseline level.	The Applicant makes note of this comment and can confirm that a letter has been issued to West Haddlesey Parish Meeting on 17 April 2026 thanking the Parish Council for identifying the issue and confirming that the correct baseline flow for Link 7 (Haddlesey Road) is 9 HGVs rather than 50 as previously reported. The Applicant also confirmed a broader check of the Transport Assessment dataset was carried out and no other errors were identified. The Applicant also advised that the assessment indicates that HGV movements on Haddlesey Road would increase to approximately 15 HGVs per day during peak construction, representing an increase of six HGV movements per day associated with the Proposed Development.
WHPM-06	West Haddlesey Parish Meeting	Transport and access	There is no mention of the following high/medium receptors that are present along the road from the A19 in Chapel and West Haddlesey. None of these listed below are recognised in the Transport and Movement Plan nor in the Outline Construction Environmental Management Plan EN0110012/APP/LVS/07.02:	The Applicant makes note of this comment and can confirm that a letter has been issued to West Haddlesey Parish Meeting on 17 April 2026 thanking the Parish Council for their comments on the sensitivity classification of this route. As set out in the response to West Haddlesey, whilst the assessments describe this route as largely rural in character, it is acknowledged that sections of the route pass

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
			• The Doorstep Green – this is a community park and recreation area with two entrances/exit points – one close to the A19 junction the other on the second of the two bends encountered coming from the A19. The Green is used for general recreation and village events (including outdoor parties involving children); • The Haddlesey Church Community Hall – this is a facility used widely in the local area – e.g. for school and children's activities, exercise classes, parties and other events during the day and evening; • Chapel Haddlesey Church of England Primary School. The school runs a breakfast club (from 7.45 am and an afterschool club until c. 4.45pm). The school entrance and exit are directly onto Millfield Road; • Tankard's Bridge – this is a Grade II listed bridge built in the late 1700's over the Selby Canal and links West Haddlesey and Chapel Haddlesey. It is a single lane bridge with no footway. Two public footpaths meet at the bridge – the very popular Selby Canal footpath used extensively by walkers as well as cyclists and people fishing, and a footpath to the River Aire. Cars are parked around the bridge by people using these footpaths. The bridge was recently damaged by a large vehicle which necessitated the closure of the canal for several months until repairs to the parapet could be made preventing canal traffic entering or leaving the Selby canal to the River Aire and the road being closed for several days while repairs were made. It presents a significant obstacle for abnormal loads and a bottleneck for traffic generally; • West Haddlesey Children's Playground. This is a children's playground – for all ages from toddler to teens containing a variety of play equipment (swings, slides, climbing frames etc) and a grass area for football/other ball games. The entrance/exit is directly onto Millfield Road. Cars park on the opposite side of the road to the entrance of the park, due to a low level wooden fence near the playground, necessitating children crossing Millfield Road. It should be noted that there is also an entrance/exit to a campground (touring caravans) in the centre of West Haddlesey as well as a pub/restaurant that has a car park exit onto the road. These are also totally absent from the LVS documentation. LVS can provide no reason why the above 'receptors' have not been recognised and considered in the Traffic and Movement Planning document.	through residential areas and near community facilities. As such, parts of the route could reasonably be considered to have a higher sensitivity to traffic changes. However, even where a higher sensitivity classification is assumed, the very small increase in HGV movements associated with the Proposed Development means that the overall conclusions remain unchanged, following the application of industry assessment guidance. More generally, construction traffic will be managed through measures included within the **Outline Construction Traffic Management Plan (oCTMP) [APP-201],** which will be developed further through a detailed Construction Traffic Management Plan (CTMP) as secured through the DCO. These measures are applied across the full project site, and include: • Scheduling deliveries to avoid peak travel periods, with no deliveries allowed before 9.30am and after 4.30pm. This commitment would also avoid the breakfast club timescales and be ahead of the pick up times for afterschool clubs when parents are dropping off or collecting children. • Clear signed routing for construction vehicles Contractor management procedures, including strict penalties for drivers who do not comply with standards. • Temporary speed management measures, to be agreed with the North Yorkshire Council. The route from the A19 through West Haddlesey to Solar Development Site 4 was selected as it represents the most direct connection to the strategic road network. Alternative routes via the A63 or A1 would require significantly longer journeys and would pass through a greater number of residential areas and communities. On this basis, the selected route was considered the most appropriate option.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
			The Parish Meeting therefore can only conclude that LVS has only conducted a superficial assessment of the route that has totally failed to identify the hazards and risks posed by this route as it passes thorough part of Chapel Haddlesey and the whole of West Haddlesey from the A19. This omission is indicative of a fundamentally flawed traffic assessment by LVS that cannot be relied on by examiners.	
WHPM-07	West Haddlesey Parish Meeting	Transport and access	Hazards and risks have been totally overlooked. It seems the driving factor is primary ease of access to Site 4 for the Applicant rather than any consideration of the considerable risks to the residents of West Haddlesey and others, particularly those using the children's facilities and school.	The Applicant makes note of this comment. **ES Volume 1, Chapter 14: Traffic and Movement [APP-052]** presents the impact assessment undertaken for traffic and details the likely significant effects of the Proposed Development on traffic and movement. The **Transport Assessment (TA) [APP-178]** has been prepared to assess the impact of the Proposed Development on the transport network during construction. Construction traffic routes and access points have been developed to utilise the most appropriate sections of the highway network and to minimise use of constrained rural routes where practicable. Table 2-1 in the TA outlines the baseline traffic flows associated on assessed links. Access routes to Solar Development Site 4 (Roe Lane, Haddlesey Road / Birkin Road and Birkin Lane) all accommodate HGV movements at present - each between 2-5% of total movements. Table 6-1 in the TA shows that there will be an average of 6 additional HGV movements per day associated with construction of the Proposed Development. It should be noted that this is a worst case forecast to ensure a robust assessment, where in reality these 6 daily movements would be spread across the access routes rather than all arriving via one as has been assessed. The conclusions of the TA are set out in full in Section 7; overall, the TA concludes that any temporary impacts from the Proposed Development can be managed through the final Construction Traffic Management Plan (CTMP), and there is not expected to be any long-term significant impacts on the transport network. The final Construction Traffic Management Plan (CTMP) will set out the detailed measures to manage construction traffic, including timing and traffic management arrangements, and will be subject to approval by the relevant planning authority in consultation with the highway authority. This process will ensure that appropriate measures are identified to manage potential interactions with sensitive receptors, including school locations, where relevant.
WHPM-08	West Haddlesey Parish Meeting	Transport and access	There will be a significant impact on all road users and a significant risk of accidents if this route is used as it is totally unsuited to the use by construction traffic.	The Applicant makes note of this comment. **ES Volume 1, Chapter 14: Traffic and Movement [APP-052]** presents the impact assessment undertaken for traffic and details the likely significant effects of the Proposed Development on traffic and movement. The review of baseline accidents and safety conditions concluded that there was not evidence of accident clustering within the referenced area (please refer to response above for further context), suggesting that there were no significant road safety concerns. The assessment demonstrates that construction traffic associated with the Proposed Development would result in relatively small and temporary increases in traffic flows on the local network. On this basis, the magnitude of change is not considered sufficient to materially alter existing road safety conditions or increase the likelihood of accidents.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				The Applicant reiterates its commitment to road safety, and notes that with implementation of the final version of the **Outline Construction Traffic Management Plan (oCTMP) [APP-201]**, roads should be no less safe than they currently are. Construction activities affecting these routes would be temporary and managed through the implementation of the CTMP. Measures may include temporary diversions, signage, and traffic management to maintain safety for users. Construction traffic will also be controlled through routing strategies and timing restrictions, reducing interaction with pedestrians where practicable. On this basis, appropriate mitigation would be in place to ensure there is no increased risk of accidents on the road network during the construction phase of the Proposed Development.
WHPM-09	West Haddlesey Parish Meeting	Transport and access	Tankard's bridge is crossed by vehicles, pedestrians, cyclists and horse riders and, in particular, parents and children walking from to and from the primary school, the village playground, the Community Hall, Doorstep Green and the main bus stops on the A19 Junction. Two footpaths meet at the bridge, as mentioned above, and the bridge is often crossed by foot traffic. The A19 crossroads is also a high-risk junction. It is often difficult, especially for large HGVs, to turn into Millfield Road from the A19 due to cars parked in front of the houses that line both sides of the road at this junction. Given the proximity of the River Aire bridge on the A19 immediately south of the crossroads, this makes this a particularly hazardous junction. It is entirely foreseeable that this will significantly increase the risk of accidents on the A19 at this difficult junction.	The Applicant makes note of this comment. Traffic surveys were undertaken in January 2025 to inform the **Transport Assessment (TA) [APP-178]**. A count location was established to the west of West Haddlesey and Tankards Bridge (Link 8 on **ES Volume 2, Figure 14.5: Traffic Survey Locations [APP-114]**). Weekday (Monday–Friday) data for this location indicates an average of 29 HGV movements per day in 2025, reducing to an average of 24 movements when weekend flows are included. It is reasonable to assume that the majority of these existing HGV movements travel through West Haddlesey via the A19 junction. During the construction period, a worst-case scenario in which all traffic associated with Solar Development Site 4 travels via the A19 through West Haddlesey and across Tankards Bridge would result in an average daily increase of up to 3 additional HGV trips to and from the Proposed Development (the equivalent uplift of 6 daily HGV movements). This uplift is comparable with observed day-to-day variation in baseline flows, with survey data recording 32 HGV movements on Monday 3 February 2025 compared to 25 movements on Tuesday 28 January 2025 (a difference of 7 movements) In addition to HGV movements, the assessment forecasts that there could be average daily increase of up to 36 other vehicle trips (72 two-way movements) expected to access Solar Development Site 4 on an average day. The assessment confirms that these construction movements would result in a temporary change in the composition of traffic flows on the route through West Haddlesey and over Tankards Bridge. However, with the implementation of the management measures set out in the **Outline Construction Traffic Management Plan (oCTMP) [APP-201]**, the effects of these additional trips can be appropriately managed. Furthermore, Solar Development Site 4 will be served by four access locations: one on Haddlesey Road and three on Roe Lane. As such, construction traffic is expected to be distributed across these access points, meaning that the number of daily trips using the route via West Haddlesey is expected to be lower than the worst-case scenario assessed. The proposed construction routing (**ES Volume 2, Figure 14.4: Construction Routing [APP-113]**) indicates alternative routes to Solar Development Site 4 via the A1(M) and M62. Notwithstanding this, the assessment has applied a consistent uplift on traffic across all access routes to ensure a robust assessment.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				No abnormal load traffic will use the route via West Haddlesey. Accident statistics for the period 2014 to 2024 (the latest available) indicates that two 'slight' accidents have occurred at the A19 / Millfield Road junction. With Department for Transport data showing average daily flows of 9,902 vehicles on this section of the A19, the forecast increase in traffic associated with construction, equating to approximately a 1% increase, is not expected to materially alter traffic composition or increase accident risk. The Applicant reiterates its commitment to road safety, and notes that with implementation of the final version of the **Outline Construction Traffic Management Plan (oCTMP) [APP-201]**, roads should be no less safe than they currently are. Construction activities affecting pedestrian routes would be temporary and managed through the implementation of the CTMP. Measures may include temporary diversions, signage, and traffic management to maintain safety for users. With further regards to accidents and safety, please refer to response above.
WHPM-10	West Haddlesey Parish Meeting	Transport and access	Several of the houses and other buildings fronting the road through West Haddlesey date back over 150 years and have minimal or no foundations and will be adversely affected by vibration from construction traffic – this is a significant concern to several of our residents.%	Birkin Road and Haddlesey Road will be used as construction routes, with further detail on the potential impacts provided in the **Transport Assessment (TA) [APP-178].** As set out in **ES Volume 1, Chapter 11: Noise and Vibration [APP-049]**, the construction plant vibration levels have been calculated in accordance with the procedures in BS 5228-2. Paragraph 11.9.26 of the **ES Chapter 11: Noise and Vibration [APP-049]** states that vibration from construction activities is anticipated to result in levels well below the threshold for risk of cosmetic damage to any properties. As presented in **ES Volume 1, Chapter 11: Noise and Vibration [APP-049]**, based on guidance provided in British Standards BS5228-2 and BS7385-2, as well as the Design Manual for Roads and Bridges (DMRB) LA 111, construction traffic vibration is unlikely to be of sufficient magnitude to result in adverse impacts on people. Risk of any damage (even cosmetic damage) to any buildings or other structures, including older houses, starts to occur at levels much higher than those that are perceptible to people. As such, no significant effects from vibration are expected. Extensive work was carried out by the Transport and Road Research Laboratory (TRRL Research Report 246, Traffic Induced Vibration in Buildings by G R Watts) that showed the levels of vibration caused by road traffic, even passing very close to historic buildings and on uneven surfaces, did not present a damage risk. The **Outline Construction Environmental Management Plan (oCEMP) [APP-192]** and **Outline Construction Traffic Management Plan (oCTMP) [APP-201]** include mitigation measures to control and minimise any potential noise and vibration impacts resulting from the construction of the Proposed Development. Where vibration is perceptible for some residents, the oCEMP requires engagement with residents to provide reassurance that properties will not be at risk of damage, particularly where vibration is perceptible.
WHPM-11	West Haddlesey Parish Meeting	Transport and access	Children will be at risk around the playground, bridge, school, and park. The footways are also limited and	The Applicant makes note of this comment. The **Transport Assessment (TA) [APP-178]** has been prepared to assess the impact of the Proposed Development on the

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
			change from one side of the road to the other in some areas. Notably there is no footway on the same side of the road as the primary school. The school access is directly onto the road to be used by the construction traffic.	transport network during construction. Construction traffic routes and access points have been developed to utilise the most appropriate sections of the highway network and to minimise use of constrained rural routes where practicable. The final Construction Traffic Management Plan (CTMP) will set out the detailed measures to manage construction traffic, including timing and traffic management arrangements, and will be subject to approval by the relevant planning authority in consultation with the highway authority. This process will ensure that appropriate measures are identified to manage potential interactions with sensitive receptors, including school locations, where relevant.
WHPM-12	West Haddlesey Parish Meeting	Transport and access	The route from the A19 crossroads through West Haddlesey is therefore totally unsuited as a route for construction traffic to Site 4.	The **Transport Assessment (TA) [APP-178]** has been prepared to assess the impact of the Proposed Development on the transport network during construction. Construction traffic routes and access points have been developed to utilise the most appropriate sections of the highway network and to minimise use of constrained rural routes where practicable. Table 2-1 in the TA outlines the baseline traffic flows associated on assessed links. Access routes to Solar Development Site 4 (Roe Lane, Haddlesey Road / Birkin Road and Birkin Lane) all accommodate HGV movements at present - each between 2-5% of total movements. Table 6-1 in the TA shows that there will be an average of 6 additional HGV movements per day associated with construction of the Proposed Development. It should be noted that this is a worst case forecast to ensure a robust assessment, where in reality these 6 daily movements would be spread across the access routes rather than all arriving via one as has been assessed. The conclusions of the TA are set out in full in Section 7; overall, the TA concludes that any temporary impacts from the Proposed Development can be managed through the final Construction Traffic Management Plan (CTMP), and there is not expected to be any long-term significant impacts on the transport network. The Applicant therefore believes that the assessed routes can suitably accommodate traffic associated with construction of the Proposed Development.
WHPM-13	West Haddlesey Parish Meeting	Transport and access	LVS should consider other alternative routes if the project is to be approved – there are a number of other options that do not have a concentration of high and medium receptors and do not pose a high risk to residents, children, visitors and road uses.	The Applicant notes this comment. Construction traffic routing strategy was developed to prioritise the most direct and appropriate routes from the Strategic Road Network to the site, while also taking account of additional factors including highway suitability, safety and the presence of local constraints. As set out in the **Transport Assessment (TA) [APP-178]**, construction traffic routes and access points have been developed to utilise the most appropriate sections of the highway network and, where practicable, to minimise the use of more constrained rural routes.
WHPM-14	West Haddlesey Parish Meeting	Transport and access	These routes, primarily off the A63, including from the Selby by-pass, present a much lower risk and impact on communities and are more suitable for the proposed traffic.	The Applicant notes this comment. Construction traffic routing strategy was developed to prioritise the most direct and appropriate routes from the Strategic Road Network to the site, while also taking account of additional factors including highway suitability, safety and the presence of local constraints. The route from the A19 through West Haddlesey to Solar Development Site 4 was selected as it represents the most direct connection to the strategic road network.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				Alternative routes via the A63 or A1 would require significantly longer journeys and would pass through a greater number of residential areas and communities. On this basis, the selected route was considered the most appropriate option.
WHPM-15	West Haddlesey Parish Meeting	Landscape and visual	The Proposed Development changes the area for decades into the future. The Proposed Development is for 60 years plus – it is effectively permanent (a point noted in the North Yorkshire Council assessment of the LVS PEIR). The impact will be not only on existing residents but also future generations. The introduction of this extensive and dominant industrial feature into an open rural landscape fundamentally alters its character and opens the door to further commercial developments and erosion of this rural area.	The Applicant's **Statement of Need [APP-214]** provides evidence that an unprecedented capacity of new low-carbon generation Proposed Developments is urgently needed for the UK to meet its legally binding climate change targets. The government has confirmed that solar energy is at the heart of the Clean Power 2030 Mission [NPS EN-3 (2025) Paras 2.10.1 & 2.10.2]. The Statement of Need confirms that the need for the Proposed Development is urgent and that substantial weight should be given to the need for the Proposed Development [NPS EN-1 (2023) Para 3.2.9-3.2.10]. In addition, the Applicant is seeking a time-limited consent for the Proposed Development to have an operational period of up to 60 years, with decommissioning to take place following cessation of operation. This is secured by Requirement 19 in Schedule 2 of the **Draft Development Consent Order (DCO) [APP-017]**. The Applicant confirms that none of the land will be considered brownfield automatically after decommissioning. The expectation is that the land will return to farming, but the Applicant cannot dictate what will happen to the land post-decommissioning when the Applicant no longer has an interest in the land. However, any proposal taken forward by a landowner after decommissioning would be seen in the context that the lawful use, post-solar, would be the land use that is currently taking place on that land. The changes to the landscape character are included in **ES Volume 1, Chapter 10: Landscape and Visual [APP-048]** with detailed baseline and effect assessments provided in **ES Volume 3, Appendix 10.2: Landscape Baseline and Effects [APP-168].** The assessment identifies that likely significant effects on landscape character areas (LCAs) are limited and would primarily occur during the construction phase. Significant effects (moderate adverse) are identified for four LCAs (LCA 3, 11, 13 and 14) during construction, arising from temporary changes in land use, loss of openness and reductions in tranquillity. At Year 1 of operation, significant effects are limited to LCA 3 only, reflecting the introduction of solar infrastructure. All other LCAs would experience effects that are minor or negligible adverse and not significant. By Year 15 of operation, effects would reduce across all LCAs, with no significant residual effects identified following establishment of mitigation planting.
WHPM-16	West Haddlesey Parish Meeting	Landscape and visual	The scale, height, and spread of the solar panels (at least 3.5m high – as high as a bungalow), fencing and associated infrastructure would be clearly visible from public footpaths, nearby homes and the surrounding countryside, changing the landscape from open farmland to a barren industrial scene.	As set out in **ES Volume 1, Chapter 10: Landscape and Visual [APP-048]**, the Landscape and Visual Impact Assessment (LVIA) has assessed effects on visual amenity of residential receptors in accordance with relevant guidance. Further detail on the approach to assessing the potential impacts on the views of residents of local communities is provided in **ES Volume 3, Appendix 10.1: Landscape and Visual Assessment Methodology [APP-167].** Visual mitigation measures include substantial new planting, reinforcement of existing vegetation, careful siting of infrastructure, and minimisation of lighting to avoid unnecessary urbanising effects. While landscape mitigation takes time to establish, the LVIA demonstrates that by Year 15 of operation, once planting has matured, the majority of landscape and visual effects would reduce to minor or non-significant levels. These are shown on the **Outline Environmental Masterplans (OEM) [PDA-003 to PDA-010]** and are secured via the **Works Plans**

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				[AS-004] and **Outline Landscape and Ecological Management Plan (oLEMP) [APP-195].** The Applicant has embedded mitigation measures to maintain the amenity of Public Rights of Way, including the provision of landscaping and a minimum 15 metre buffer offset from all infrastructure, including fencing; these measures are set out in **ES Volume 1, Chapter 13: Socioeconomics [APP-051]** as well as the provision of new permissive paths. In addition, measures have been identified to minimise disruption and manage temporary diversions during construction, ensuring pedestrian access is maintained wherever possible and that safe, clearly signposted alternatives are implemented where necessary. These are set out in the **Outline Public Rights of Way Management Plan (oPROWMP) [APP-199]** submitted as part of the Application.
WHPM-17	West Haddlesey Parish Meeting	Landscape and visual	Site 4 nearest to West Haddlesey is the largest site in the proposal at 283.8 hectares (701 acres) – making this one of the largest individual solar sites in the UK if approved and will visually dominate the area and fundamentally alter the landscape and amenity value for all the surrounding villages.	The changes to the landscape character have been assessed in **ES Volume 1, Chapter 10: Landscape and Visual [APP-048]** with detailed baseline and effect assessments provided in **ES Volume 3, Appendix 10.2: Landscape Baseline and Effects [APP-168]**. Site 4 is located within landscape character areas LCA 7: Aire Valley and LCA 13: Haddlesey Farmland, both of which are assessed. Impacts on LCA 7 would be very limited and localised, as no solar development areas are located within the character area. LCA 13, within which Solar Development Sites 3 and 4 are located, would experience the most direct and notable landscape effects. Moderate adverse (significant) effects are predicted during construction due to the introduction of large-scale infrastructure and loss of openness. However, effects would reduce through operation and, following the establishment of mitigation planting, are assessed as minor adverse and not significant at Year 15 of operation, with the development becoming partially integrated into the landscape. With respect to residential visual amenity, Landscape Institute Technical Guidance Note (TGN) 01/24 explains in point 6(1) that views from houses and individual properties are a matter of private amenity, noting that it is an established planning principle that there is no right to a view. The LVIA has not identified any significant adverse residual effects on the views of residents that would breach the Residential Visual Amenity threshold and cause serious harm to the living conditions of residents (major adverse) and therefore a Residential Visual Amenity Assessment (RVAA) has not been carried out. Further information is provided in Table 10-5 of **ES Volume 1, Chapter 10: Landscape and Visual [APP-048]**.
WHPM-18	West Haddlesey Parish Meeting	Landscape and visual	The area is an intensively farmed landscape with areas that are sensitive to change such as grassland areas, watercourses and woodland. Site 4 runs up to Gateforth Wood an area of public recreation and amenity. The project if approved will fundamentally change the character of the landscape and the amenity value of this woodland.	The Applicant acknowledges the sensitivity of the landscape in the vicinity of Gateforth Wood and the importance of this area for recreation and amenity. As set out in the **Design Approach Document (DAD) [APP-216]**, the layout of Solar Development Site 4 has been informed by a clear design strategy to retain and strengthen existing landscape features and to avoid unacceptable effects on key receptors, including areas of public access such as Gateforth Wood. In this context, the design incorporates setbacks and offsets from Gateforth Wood and its boundaries, ensuring that development is not located directly adjacent without mitigation, alongside the retention of intervening field boundaries where practicable. The DAD also sets out proposals to enhance recreational connectivity through the introduction of new permissive paths within and around Site 4, which will complement

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				the existing Public Rights of Way network and provide improved access to, and around, Gateforth Wood, increasing opportunities for public enjoyment of the landscape. These routes are designed to integrate with the landscape structure and benefit from proposed planting, improving the quality of the recreational experience over time.
WHPM-19	West Haddlesey Parish Meeting	Landscape and visual	We fully support other Parish Council representations that any significant changes to the landscape would be contrary to policies such as the 'Selby District Core Strategy Local Plan (2013)' and the 'Revised Publication: Selby Local Plan (2024)' that seek to protect local landscape character and rural setting and prevent urban sprawl.	As a National Significant Infrastructure Project, NPS EN-1, combined with any technology specific energy NPS where relevant, provides the primary policy for decisions by the Secretary of State. Whilst it is acknowledged that local planning policies, such as those contained in the Selby Local Plan, may be important and relevant, paragraph 5.10.5 of NPS EN-1 is clear in recognising that "*virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation*." The Proposed Development has identified opportunities for landscape restoration and enhancement, by introducing planting which repairs or reinforces existing vegetation patterns (as illustrated on the **Outline Environmental Masterplans (OEM) [PDA-003 to PDA-010]**). The LVIA also informed the identification of opportunities for new green infrastructure including permissive paths and additional tree and hedgerow planning, which will have the added benefit of supporting new habitats. Overall, the Proposed Development would avoid impacts on nationally designated landscapes and have no significant residual effects beyond the site level by year 15 of operation. Taking into account the recognition in the NPSs that energy infrastructure is likely to have landscape and visual effects, it is considered that the Proposed Development is compliant with relevant NPS policy and the localised residual landscape effects identified do not outweigh the benefits of, or urgent need for, the Proposed Development.
WHPM-20	West Haddlesey Parish Meeting	Landscape and visual	We agree and fully support the similar points made by South Milford Parish Council and expressed in the 'NYC Strategic Committee Report' on 10th Feb 2026 - where para 4.8 presents the Council's Landscape Officers concerns, highlighting "The potential negative cumulative effects on local communities….; the transformative scale of the Proposed Development in combination with other major development; the significance of the grid connection point at Monk Fryston substation; the pace of change and the erosion of the landscape and visual baseline around those settlement areas affected".	Information regarding cumulative effects can be found in **ES Volume 1, Chapter 17: Cumulative and In-Combination Effects [APP-055].** In addition, through developing the ES, each topic chapter, where relevant, has included a cumulative impact assessment, considering other committed developments in the area and potential added impacts to aspects such as landscape. It has been assessed that the Proposed Development is likely to lead to some cumulative landscape and visual effects during construction, year 1 of operation and decommissioning stages. These effects represent the change to the landscape and visual experiences that would emerge during any change to the landscape, as recognised through NPS EN-1 which acknowledges in Section 5.10 that "*virtually all nationally significant energy infrastructure projects will impact the landscape*". It should be noted that with proposed mitigation in place and following initial establishment, landscape and visual impacts will generally reduce over time.
WHPM-21	West Haddlesey Parish Meeting	Alternatives and Design Iteration, and Site Selection	This 60-year project is not a temporary loss. The long-term loss of such land to industrial-scale infrastructure is not justified, particularly where alternative sites (including brownfield or lower grade land) and other options have not been adequately explored.	The Applicant makes note of this comment and refers the Parish Council to the submitted **Statement of Need [APP-214]** and the **Environmental Statement Volume 3, Appendix 3.1: Site Selection Assessment Report (SSAR) [AS-019]** which sets out the methodical approach the Applicant has taken to site identification and selection.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				Previously developed land (PDL) (including brownfield sites, contaminated land and industrial land) and lower grade agricultural land have been considered, as set out in **ES Volume 3, Appendix 3.1: Site Selection Assessment Report (SSAR) [AS-019]**. None of the PDL sites considered were considered suitable and/or available, either individually or in combination with other sites, to facilitate a 500 MW solar project. Regarding lower grade agricultural land, the Applicant adopted a sequential approach to its site selection assessment by initially excluding grades 1, 2 and 3 agricultural land from its site selection search. The first four potential development areas identified at this stage of the assessment were discounted due to existing or Proposed Development on the sites and site size. On that basis, the Applicant went on to consider higher grade agricultural land. Five further potential development areas were then identified and assessed against standard assessment criteria including agricultural land classification, ecology and biodiversity, cultural heritage, flood risk and other factors. Each Potential Development Area was also considered for its ability to deliver the Project Objectives. When all assessment results were balanced, it was concluded that there are no more suitable and available locations within the search area than the location for the Proposed Development, based on the Project Objectives and the assessment criteria applied.
WHPM-22	West Haddlesey Parish Meeting	Agricultural Land and Soils	As mentioned in the application documents (EN0110012/APP/LVS/06.01.05), the majority of the land within the nearest site to West Haddlesey site 4 is classified as Agricultural Land Classification (ALC) 1-3b [ranging from excellent (1%) to very good to moderate quality (99%)]. None of the land at Site 4 is classified as poor or very poor quality.	The Applicant makes note of this comment. An assessment of the potential effects of the Proposed Development on soils and agricultural land is provided in **ES Volume 1, Chapter 5: Agricultural Land and Soils [APP-043]**. As set out in Chapter 5, 77.1 ha of Solar Development Site 4 is classified as Subgrade 3a and a further 51.1 ha (16%) as Grades 1 and 2, whilst 156.8 ha (56%) is classified as Grade 3b. As set out in **ES Volume 3, Appendix 3.1: Site Selection Assessment Report (SSAR) [AS-019]** the process of site selection has taken considered the minimisation of BMV land use against other factors including flood risk, sensitive receptors, heritage impacts and safe access. The overall approach to design and mitigation have been informed through pre-application engagement with Natural England.
WHPM-23	West Haddlesey Parish Meeting	Agricultural Land and Soils	The use of this Best and Most Versatile agricultural land appears to have been selected simply because the land was easily available. There has been no attempt to avoid high quality land, contrary to Local Plan policy. This is also true of other proposed sites. Basing large scale solar developments primarily on what is a rather random process of farmers making areas available for development, results in what we now see is an uncoordinated and invasive concentration of developments on a regional basis making a greater detrimental impact across our region as a whole.	The Applicant makes note of this comment and refers the Parish Council to **Environmental Statement Volume 3, Appendix 3.1 Site Selection Assessment Report (SSAR) [AS-019]** which sets out the methodical approach the Applicant has taken to site identification and selection including how the use of BMV has been minimised. The SSAR sets out the process of site selection and how impacts to BMV land has been balanced against other factors in determining the SDSs as being the most appropriate location for the Proposed Development, including flood risk, sensitive receptors, heritage impacts and safe access. The SSAR concludes there are no more suitable alternative sites within 25 km, and the selected Solar Development Sites are the most appropriate to meet the project objectives.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				As set out in the **Planning Statement [APP-207]** through the site selection process, siting of built infrastructure, the Design Commitments and the application of embedded and additional mitigation and management methods, set out in the **Outline SRMP [APP-203]**, **Outline Operational Environmental Management Plan (oOEMP) [APP-193]** and **Outline Decommissioning Environmental Management Plan (oDEMP) [APP-194]**, impacts on BMV agricultural land have been minimised and mitigated. The overall approach to design and mitigation have been informed through pre-application engagement with Natural England. The Applicant has complied with planning policy in respect of site selection and design and agricultural land and the wider benefits for the agricultural businesses, for biodiversity and for delivery of affordable, zero carbon energy, are considered in this context to weigh in favour of the Proposed Development.
WHPM-24	West Haddlesey Parish Meeting	Landscape and visual	This project could have been designed to significantly reduce the current impact especially given the dominating area proposed for Site 4 which is far too large and out of keeping with the area.	Paragraph 5.10.26 of NPS EN-1 states that "*reducing the scale of a project can help to mitigate the visual and landscape effects of a proposed project. However, reducing the scale or otherwise amending the design of a proposed energy infrastructure project may result in a significant operational constraint and reduction in function – for example, electricity generation output*." This also important in the context of Section 4.2 of NPS EN-1, which stresses the critical national priority for low carbon infrastructure. The Applicant followed a robust environmentally led design process taking account of the mitigation hierarchy. As the design has evolved, effects considered in the EIA have been avoided from the outset where possible, where further effects have been identified it has been possible to demonstrate that they can be reduced where practicable, through measures that form part of the design, or through application of methods for construction, operation and decommissioning ('embedded mitigation'). With respect to Site 4, this includes green corridors across the landscape to strengthen the green infrastructure and nature network and incorporating public rights of way and permissive paths. In addition, a large area in the southeastern corner of Site 4 close to Haddlesey Road, will not be used for solar infrastructure and instead have alternative land use; currently indicated as a potential recreational space.
WHPM-25	West Haddlesey Parish Meeting	Agricultural Land and Soils	In addition, the 13-mile Cable Route Corridor will be laid across large areas of prime agricultural land, carving up the landscape, destroying vegetation and impacting on the local wildlife.	The Applicant makes note of this comment and refers the Parish Council to Environmental Statement where the Cable Route is assessed for the potential impacts on agricultural land **[APP-043]**, landscape **[APP-048]**, and biodiversity **[APP-044]**, and no significant impacts are assessed to arise.
WHPM-26	West Haddlesey Parish Meeting	Agricultural Land and Soils	In addition, the 13-mile Cable Route Corridor will be laid across large areas of prime agricultural land, carving up the landscape, destroying vegetation and impacting on the local wildlife. Given the reliance of the UK on food imports, and increasingly volatile international politics, there is a clear risk to food security as there is little/no overall consideration of the totality of proposed solar industrialisation especially given the uncoordinated proliferation of large-scale solar sites in the UK. The project will therefore negatively impact UK food security. We consider solar infrastructure should be	As set out in the **Outline Construction Environmental Management Plan (oCEMP) [APP-192],** the land use for the Cable Route Corridor construction would be temporary in nature; once the cable has been laid underground and completed, the land will be reinstated to its previous state and use, allowing for activities such as farming to continue after construction. Therefore, there will be no impact on food production as a result of the Cable Route Corridor.

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			prioritised for brownfield sites and rooftops (industrial/warehouses) to protect national food security.	
WHPM-27	West Haddlesey Parish Meeting	Cumulative and In-Combination Effects	We have serious concerns about the cumulative impact of this proposal when considered alongside other existing and approved projects in the wider area. We note and fully support the comments made by South Milford Parish Council where they state that "a review of renewable energy planning applications (Q2 2025) revealed that there were 15 Nationally Significant Infrastructure Projects (NSIP) and 71 lower-level renewable energy planning applications being considered within a 15-mile radius of the South Milford."	The Applicant makes note of this comment. Information regarding cumulative effects can be found in **Environmental Statement (ES) Volume 1, Chapter 17: Cumulative and In-Combination Effects [APP-055]**. Through developing the ES, each topic chapter, where relevant, has included a cumulative impact assessment, considering other committed developments in the area (including surrounding South Milford) and potential added impacts to aspects such as traffic. As outlined in Section 17.6 of **Chapter 17 [APP-055]** a 10 km radius was used to create an initial long list for consideration within the cumulative impacts assessment based on the zone of influences identified within the ES chapters. Where it was appropriate for technical topics to consider National Significant Infrastructure Projects (NSIPs) within a larger spatial area, a 20 km radius was used (for Biodiversity and Ornithology). The topic-specific conclusions are summarised in each relevant topic chapter of the ES and in Table 17-12 of **ES Volume 1, Chapter 17: Cumulative and In-Combination Effects [APP-055]**. The cumulative assessment has taken into account nearby developments, including other solar projects, that fall within the relevant zones of influence for each topic to evaluate potential combined effects. Many of these developments are located within North Yorkshire, with some in nearby administrative areas due to the proximity of the Proposed Development to other administrative areas. The assessment concludes there will be significant adverse cumulative landscape and visual effects with three other energy Proposed Developments and a locally significant loss of BMV land (not significant at a regional level). No other significant adverse cumulative effects were found with other energy Proposed Developments.
WHPM-28	West Haddlesey Parish Meeting	Cumulative and In-Combination Effects	We are also concerned that the Light Valley Solar project's 'Preliminary Environmental Information Report' (PEIR) focuses narrowly on the impact of this Proposed Development in isolation and fails to consider properly the combined effects on the landscape character, traffic levels, and residential amenity arising from multiple projects and developments operating concurrently or sequentially.	The Applicant makes note of this comment and refers the Parish Council to **Environmental Statement Volume 1, Chapter 17: Cumulative and In-Combination Effects [APP-055]** which has reviewed the cumulative effects and in-combination effects comprehensively across different projects and receptors.
WHPM-29	West Haddlesey Parish Meeting	Cumulative and In-Combination Effects	There are significant existing developments ongoing in the area which have not been taken into account.	The Applicant makes note of this comment and refers the Parish Council to **Environmental Statement Volume 1, Chapter 17: Cumulative and In-Combination Effects [APP-055]**. The cumulative assessment concludes there will be significant adverse cumulative landscape effects on two landscape character areas and visual effects at seven viewpoints, and a locally significant loss of BMV land (not significant at a regional level). No other significant adverse cumulative effects were found.
WHPM-30	West Haddlesey Parish Meeting	Landscape and visual	We support the view that this proposal contributes to an unacceptable cumulative industrialisation of the	The Applicant notes this comment. Information regarding cumulative effects can be found in **ES Volume 1, Chapter 17: Cumulative and In-Combination Effects [APP-**

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
			countryside and the application fails to address sufficiently the combined visual and environmental impact of multiple developments.	**055].** Table 17-12 provides the broad overall conclusions regarding cumulative effects for **ES Chapters 5 to 15 [APP-043 to APP-053],** including in respect of landscape and visual impacts. In addition, through developing the ES, each topic chapter, where relevant, has included a cumulative impact assessment, considering other committed developments in the area and potential added impacts to aspects such as landscape and visual.
WHPM-31	West Haddlesey Parish Meeting	Socioeconomics , Tourism and Recreation	West Haddlesey residents have concerns that the development will adversely affect the amenity of the local area – there will be visual impacts and detrimental impacts on recreational use of the area (for example Birkin Fisheries and Tea Room which is a heavily used recreational feature that will be dominated and irreversibly adversely effected by the development of Site 4).	The assessment within **ES Volume 1, Chapter 13 Socioeconomics [APP-051]** identified that, before mitigation, Birkin Fisheries and Tea Room would potentially experience temporary disturbance, disruption and reduced amenity value during the construction activities. Mitigation has been incorporated including the management of HGV movements, scheduling of noisy activities and implementation of temporary acoustic and visual screening for these receptors. With additional mitigation in place, it has been assessed that effects would reduce to minor adverse and would not be significant. Effects would be temporary and limited to those time periods where construction activities are occurring in proximity to this receptor and would not continue for the entire duration of the construction period.
WHPM-32	West Haddlesey Parish Meeting	Construction and decommissioning	During construction (setting aside the high risks given the specific high/medium receptors omitted in the Traffic and Movement Plan by LVS and mentioned at 1. above) residents of West Haddlesey will be impacted by recurrent noise, air quality (dust), vibration, lighting and the increased disturbance in a previously very quiet rural area.	As West Haddlesey is approximately 1.5km east of Solar Development Site 4 and is not close to the Cable Route Corridor it would not experience significant effects from the construction of the Solar Development Site, West Haddlesey is outside of the study area for direct noise and vibration assessment within **ES Volume 1, Chapter 11: Noise and Vibration [APP-049]** and is well beyond the distance for potential significant effects to occur. This response therefore relates to construction traffic management only. Haddlesey Road / Birkin Road will be used to access from the A19 to Solar Development Site 4. As noted in a previous response, the Applicant has revisited and acknowledged the correct the baseline HGV usage data on this route between the A19 and the south end of Solar Development Site 4. **ES Chapter 11: Noise and Vibration [APP-049]** outlines indirect impacts from construction traffic with a study area of 50 m around affected roads being used. The assessment concludes that Birkin Road, Main Street and Haddlesey Road are all predicted to be subject to negligible construction traffic noise impacts. Construction traffic vibration has not been assessed as the maintained road surface that would be used by construction vehicles should be free of irregularities. Furthermore, construction vehicles will be similar to existing vehicles operating on public roads so any vibration arising would be similar. Construction traffic vibration will therefore not have the potential to lead to significant adverse effects. **ES Volume 3, Appendix 16.1: Construction Dust Assessment [APP-183]** outlines that *"with the appropriate best practice mitigation measures suitable for high-risk sites in place, there is likely to be no significant effects on existing receptors from the dust-generating activities onsite"* and therefore the residents of West Haddlesey will not experience significant effects.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				A range of measures will be adopted to minimise impacts on local communities and other sensitive locations during the construction period and these are secured via the **Outline Construction Environment Management Plan (oCEMP) [APP-192]** and the **Outline Construction Traffic Management Plan (oCTMP) [APP-201].** Legal requirements and best practice methods will be followed including careful planning and scheduling of works.
WHPM-33	West Haddlesey Parish Meeting	Noise and vibration	As already mentioned, the risk of vibration damage to older houses in the village on the road is a particular concern.	The Applicant notes this comment and has responded above. As set out in **ES Volume 1, Chapter 11: Noise and Vibration [APP-049]**, the construction plant vibration levels have been calculated in accordance with the procedures in BS 5228-2. Paragraph 11.9.26 20.1.26 of the **ES Chapter 11: Noise and Vibration [APP-049]** states that vibration from construction activities is anticipated to result in levels well below the threshold for risk of cosmetic damage to any properties. As presented in **ES Volume 1, Chapter 11: Noise and Vibration [APP-049]**, based on guidance provided in British Standards BS5228-2 and BS7385-2, as well as the Design Manual for Roads and Bridges (DMRB) LA 111, construction traffic vibration is unlikely to be of sufficient magnitude to result in adverse impacts on people. Risk of any damage (even cosmetic damage) to any buildings or other structures, including older houses, starts to occur at levels much higher than those that are perceptible to people. As such, no significant effects from vibration are expected. As such, no vibration adverse impacts are expected and are scoped out from the EIA assessment. Extensive work was carried out by the Transport and Road Research Laboratory (TRRL Research Report 246, Traffic induced vibration in buildings) that showed the levels of vibration caused by road traffic, even passing very close to historic buildings and on uneven surfaces, did not present a damage risk. The **oCEMP [APP-192]** and **oCTMP [APP-201]** include mitigation measures to control and minimise any potential noise and vibration impacts resulting from the construction of the Proposed Development. Where vibration is perceptible for some residents, the oCEMP requires engagement with residents to provide reassurance that properties will not be at risk of damage, particularly where vibration is perceptible.
WHPM-34	West Haddlesey Parish Meeting	Biodiversity and Ecology	Our residents fear the rural character of the area will be irredeemably lost along with impacts on local wildlife.	The Applicant notes the concerns regarding impact on rural character and wildlife. The Proposed Development has been designed to maximise the energy generation benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects. The Applicant acknowledges that the Proposed Development would introduce changes to the character of parts of the landscape and to some views. However, the LVIA set out in **ES Volume 1, Chapter 10: Landscape and Visual [APP-048]** concludes that, with embedded and additional mitigation, the resulting effects would be localised, reversible and would reduce over time. This approach is consistent with paragraph 5.10.5 of the Overarching National Policy Statement for Energy (NPS EN 1), which recognises that *"virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape,"* while also acknowledging that beneficial landscape character effects may arise through mitigation.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 6: Biodiversity [APP-044]** and **ES Volume 1, Chapter 12: Ornithology [APP-050]**. The Applicant has followed a robust environmentally led design process taking account of the mitigation hierarchy. This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the Proposed Development. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. The assessment concludes that there will no likely significant adverse impacts from the Proposed Development.
WHPM-35	West Haddlesey Parish Meeting	Ornithology	For Site 4 given the large area and proximity to the River Aire concerns remain regarding habitat disturbance, the removal of hedging, the loss of wildlife corridors, and insufficient long-term management and monitoring commitments. For site 4 for example – this area is used by barn owls, deer and other wildlife. In hard winters and cold winter periods the fields of site 4 are used by swans for winter grazing with over 20+ birds present at times and significant numbers of other waterfowl. An ecological survey does not pick this up unless it is conducted continually over several years. Clearly lack of winter grazing may for example limit recovery of swan populations already impacted by bird flu.	The Applicant acknowledges the concerns raised regarding Site 4. However, it is important to clarify that the concerns relating to non-breeding birds, particularly swan species, pertain to areas located directly north of the river and more than 500 m from the Site boundary, which were recorded during ornithological surveys. Within the boundary of Site 4, the bird assemblage is predominantly comprised of geese, specifically greylag geese, which are considered a feral population. Notwithstanding this, these birds have been afforded appropriate consideration as part of the wider Humber Estuary and Lower Derwent Valley SPA and Ramsar populations. Consequently, they have been incorporated into the overall mitigation strategy, with suitable provision delivered within Site 1. Furthermore, wildfowl are highly adaptive and responsive species, selecting areas for landing, foraging, and roosting based on conditions within a given winter season. Their distribution can be influenced by a range of factors, including crop type, flooding events, and levels of disturbance. Given their high mobility, these species frequently utilise adjacent fields, and accordingly, peak counts from surrounding areas have been incorporated into the assessment to inform the design and size of the Bird Mitigation Area. The Applicant invites the respondent to visit **ES Volume 3, Appendix 12.2: Non-breeding Bird Survey Report [AS-029 to AS-031]** and **ES Volume 1, Chapter 12: Ornithology [APP-050]**, where the concerns are discussed in depth. With regards to barn owl, impacts to this species are considered de-minimums, arable farmland is considered sub-optimal for this species and rough grassland and field margins will be implemented as part of the design and roosting and nesting locations such as buildings and mature trees will be retained. Furthermore, boxes will also be installed throughout the Site to increase the carrying capacity of the Site. The Proposed Development will not result in the loss of hedgerows. The woodland and hedgerow network within the Solar Development Sites will be strengthened through the creation of new areas of habitat to increase habitat connectivity (as secured through the **Outline Landscape and Ecological Management Plan (oLEMP) [APP-195]**. Wide commuting corridors are proposed within the Solar Development Sites comprising neutral grassland and other valuable ecological habitats which will remain unfenced, allowing the maintained permeability of the Order Limits for a range of fauna including larger mammals. The presence of these numerous existing and newly created commuting corridors within the Proposed Development will limit habitat

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				fragmentation within the Order Limits alone and cumulatively when considering impacts of other consented proposals. Furthermore, the arable land that will be lost will be replaced with grassland beneath the solar panels, which will also form suitable commuting habitat for a range of fauna, and due to the halt of detrimental farming practices (e.g. extensive pesticide use), will improve the biodiversity of the Order Limits post development.
WHPM-36	West Haddlesey Parish Meeting	Agricultural Land and Soils	The cumulative impact of panel coverage and construction across multiple sites will increase water runoff from panels, soil compaction and erosion in the long-term. The PEIR acknowledges a high risk of permanent soil degradation through compaction and poor drainage.	The **Outline Drainage Strategy (ODS) [APP-182]** demonstrates how surface water runoff arising from the Proposed Development can be managed appropriately during construction and operation, without increasing surface water flood risk on-site or elsewhere. As long as vegetation beneath the solar arrays is retained, no significant increase in surface water runoff is anticipated from the installation of the solar PV areas when compared to the existing scenario. The potential effects of soil compaction during construction have been considered within the **Outline Drainage Strategy (ODS) [APP-182]** and the **Outline Construction Environmental Management Plan (oCEMP, [APP-192])** which considers appropriate construction-phase measures to be implemented to manage this risk. Furthermore, the **Outline Soil Resource Management Plan (oSRMP) [APP-203]** sets out best practice measures to avoid damage to soil structure, including measures to both minimise ground compaction and ensure remedial action is undertaken where ground is compacted. The soil resource in the Order Limits is identified as medium to low sensitivity, with medium to high resilience to structural damage respectively. The potential effects of soil compaction during construction have been considered within the **Outline Drainage Strategy (ODS) [APP-182]** and the **Outline Construction Environmental Management Plan (oCEMP, [APP-192])** which considers appropriate construction-phase measures to be implemented to manage this risk. Furthermore, the **Outline SRMP [APP-203]** sets out good practice measures to avoid damage to soil structure, including measures to both minimise ground compaction and ensure remedial action is undertaken where ground is compacted. Utilising grass or wildflower cover will help to enhance interception and root growth, promoting effective rainwater infiltration and interception. Handling soils in appropriate moisture conditions will avoid damage to soil structure, particularly from compaction and smearing.
WHPM-37	West Haddlesey Parish Meeting	Water Resources and Flood Risk	The area is already vulnerable to surface water impact, especially given the clay and sandy soil composition. The loss of vegetation and soil compaction during construction will exacerbate the flood risks.	The Proposed Development is being carefully designed to minimise impacts on water resources and flood risk. Key embedded mitigation measures include setting back infrastructure from watercourses (10m); where infrastructure is placed in areas at risk of flooding, it is designed to be flood-resistant; sustainable drainage systems (SuDS) will be used to manage surface water runoff, maintaining greenfield runoff rates and reducing flood risk. The **Outline Drainage Strategy (ODS) [APP-182]** sets out the Applicant's assessment of surface water runoff from the Solar PV areas. The solar panels are not expected to increase runoff volumes or peak runoff rates, or adversely affect time to peak, compared with pre-development conditions. Utilising grass or wildflower cover will help to enhance interception and root growth, promoting effective rainwater infiltration and

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				interception. Case studies such as Ref. 20 within the **ODS [APP-182]** indicate that where panels are installed above well-maintained grassland, changes in runoff volume and peak discharge are negligible. The same study demonstrates that ground cover is a key factor in controlling runoff, with well-managed vegetation helping to maintain drainage performance across solar array areas. Furthermore, the Proposed Development is in accordance with all relevant national standards and guidelines on the management of surface water, including NPS EN-3 on the management of runoff from solar panels. The **Outline SRMP [APP-203]** includes measures on management of soil compaction. It states that compaction will be monitored during construction by inspecting the soil following installation of piles but prior to fixing the panels. If compaction is identified, remedial action must be taken while the ground remains accessible to the machinery required to relieve compaction and before the panels are fixed.
WHPM-38	West Haddlesey Parish Meeting	Construction and decommissioning	Although the application describes the development as temporary, it would remain in place for a significant number of years. It should be regarded as a permanent development and cannot be considered temporary. There is insufficient detail as to how the site would be restored at the end of its operational life or how this would be guaranteed.	The Applicant is seeking a time-limited consent with respect to the operation of the Proposed Development, which will start from the date of the final commissioning phase of the Proposed Development. The operational life of the Proposed Development will be up to 60 years with decommissioning to take place following cessation of operation. This is secured by Requirement 19 in Schedule 2 of the **Draft Development Consent Order (DCO) [APP-017]**. At the end of the Proposed Development's operational life, it would be decommissioned and the land restored to its original use and condition as far as practicable. Information on decommissioning activities is provided within the **Outline Decommissioning Environmental Management Plan (oDEMP) [APP-194]**.
WHPM-39	West Haddlesey Parish Meeting	Construction and decommissioning	The application states that the underground cables will remain and will not be removed as part of the decommissioning process and will therefore result in long-term scarring and limit the future use of the land affected.	The land use for the Cable Route Corridor construction would be temporary in nature; once the cable has been laid underground and completed, the land will be reinstated to its previous state and use, allowing for activities such as farming to continue. As set out in **Cable Route Method Statement [APP-147]** the cable trench would be up to 2 m wide and 2 m deep. The mode of dealing with Interconnecting Cables and Grid Connection Cables during decommissioning will be dependent upon government policy and good practice at that time. Currently, the most environmentally acceptable option is to leave the cables in-situ. If required at the time, the cables could be removed by excavating at regular intervals and pulling the cable through to the extraction point, thus avoiding the need to excavate the entire cable trench. In either case, the disturbance to the land and soil would be less than that likely to occur during the construction phase.
WHPM-40	West Haddlesey Parish Meeting	Community benefit	The proposal offers little or no direct benefit to our village and community, despite the scale of impact borne by residents. We do not see any evidence that any benefit will come to residents in the area of these developments. There appear to be no or few employment benefits in the local area. The profit and benefit are taken out of the area leaving residents with only the adverse impacts.	The Applicant is committed to providing a Community Benefit Fund to allow for community driven benefits that are not necessarily associated with the Proposed Development itself as the Applicant agrees that the communities closest to the project should benefit from it. As set out in the **Planning Statement [APP-207]** the Proposed Development will also provide localised benefits including Employment generation and Gross Value Added contributions during the construction and decommissioning phases as well as local recruitment and procurement and supporting local education and skills uplifting,

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				including promotion of apprenticeship Proposed Developments, workforce training, and STEM education initiatives.
South Milford Parish Council				
SMPC-01	South Milford Parish Council	Landscape and visual	The Proposed Development would introduce an extensive industrial feature into an open rural landscape, fundamentally altering its character. The scale, height, and spread of the solar panels, fencing and associated infrastructure would be clearly visible from public footpaths, nearby homes and the surrounding countryside, changing the landscape from open farmland to an industrial site.	A detailed Landscape and Visual Impact Assessment (LVIA) has been undertaken and is reported in **ES Volume 1, Chapter 10: Landscape and Visual [APP-048].** The LVIA assesses the likely significant effects of the Proposed Development on both landscape character and people's views and visual amenity during construction, operation and decommissioning, in accordance with the relevant legislation, policy, standards and guidance set out in Chapter 10, Section 10.3 **[APP-048]**. This includes the assessment of visual impacts with reference to viewpoints across the study area, including from PRoW. Residential views are a matter of private amenity and have not been assessed. Further detail is provided in Table 10-5 of **ES Volume 1, Chapter 10: Landscape and Visual [APP-048]**. South Milford straddles two Landscape Character Areas defined in the Selby Landscape Character Assessment: LCA 8: west Selby Limestone Ridge and LCA 11: Sherburn Farmland. Minor adverse effects are predicted for LCA 8 during construction and year 1 of operation, with no effects by year 15 of operation. With respect to LCA 11, whilst moderate adverse effects (significant) are assessed for construction and year 1 of operation, these would reduce to minor adverse by year 15 of operation, which is not significant. Intervening vegetation and buildings means that views from South Milford are likely to be screened. The design of the Proposed Development has included the establishment of **Design Parameters and Commitments document [APP-217]**, for example minimum offsets from residential properties. Mitigation measures, secured by the **Outline Landscape and Ecological Management Plan (oLEMP) [APP-195]**, include substantial new planting, reinforcement of existing vegetation, careful siting of infrastructure, and minimisation of lighting to avoid unnecessary urbanising effects. While landscape mitigation takes time to establish, the LVIA demonstrates that by Year 15 of operation, once planting has matured, the majority of landscape and visual effects would reduce to minor or non-significant levels.
SMPC-02	South Milford Parish Council	Landscape and visual	The 'Selby Landscape Character Assessment', Character Area 8: Natural Character (2019) states: 'This is an intensively farmed landscape, though locally important watercourses, marsh and wetlands, grasslands and woodlands are sensitive to change. Woodland on the upper slopes of the limestone ridge contributes greatly towards the character of the landscape and Locally Important Landscape Area (LILA) and often dominates the distant skylines. Therefore, this woodland would be highly sensitive to changes from new features and development in the landscape'.	The Applicant has included an assessment of the effects of the Proposed Development on Landscape Character Area 8 (LCA 8: West Selby Limestone Ridge) within **ES Volume 1, Chapter 10: Landscape and Visual [APP-048]** with detailed baseline and effect assessments provided in **ES Volume 3, Appendix 10.2: Landscape Baseline and Effects [APP-168]**. It lies on the western edge of the study area, covering a small part of the Order Limits associated with CRC 4-POC and does not coincide within any areas proposed for solar panels, as shown on **ES Volume 2, Figure 10.3.2: Selby District Published Landscape Character Areas [APP-092].** LCA 8 is identified as a high sensitivity receptor due to its elevated and undulating landform, woodland structure, rural character and LILA. The assessment concluded that, although LCA 8 is of high sensitivity, the Proposed Development would result in localised and temporary effects that are not significant, with no residual effects at operation following establishment of mitigation planting.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
SMPC-03	South Milford Parish Council	Landscape and visual	Any significant changes to the landscape would be contrary to policies such as the 'Selby District Core Strategy Local Plan (2013)' and the 'Revised Publication: Selby Local Plan (2024)' that seek to protect local landscape character and rural setting and prevent urban sprawl./	As a National Significant Infrastructure Project, NPS EN-1, combined with any technology specific energy NPS where relevant, provides the primary policy for decisions by the Secretary of State. Whilst it is acknowledged that local planning policies, such as those contained in the Selby District Core Strategy Local Plan (2013) and the Revised Publication: Selby Local Plan (2024), may be important and relevant, paragraph 5.10.5 of NPS EN-1 is clear in recognising that "*virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation*." The relevant policy relating to the countryside in the Selby Core Strategy 2013 is Policy SP2 (Spatial Development Strategy), with part C seeking to limit the type and scale of development within the countryside. In this context, the Proposed Development has been designed to respond to the critical national priority for low carbon infrastructure, while seeking to avoid, minimise and/or mitigate potential harmful effects. The overall extent of the development reflects the land required to support viable renewable energy generation and an efficient grid connection, alongside substantial provision for environmental mitigation and enhancement. The Applicant included the assessment of the effects of the Proposed Development on landscape character within **ES Volume 1, Chapter 10: Landscape and Visual [APP-048]** with the detailed baseline and effect assessments provided in **ES Volume 3, Appendix 10.2: Landscape Baseline and Effects [APP-168]**. The LVIA identifies that likely significant effects on landscape character are limited and would primarily occur during the construction phase. Significant effects (moderate adverse) are identified for four LCAs (LCA 3, 11, 13 and 14) during construction, arising from temporary changes in land use, loss of openness and reductions in tranquillity. At Year 1 of operation, significant effects are limited to LCA 3 only, reflecting the introduction of solar infrastructure. All other LCAs would experience effects that are minor or negligible adverse and not significant. By Year 15 of operation, effects would reduce across all LCAs, with no significant residual effects identified following establishment of mitigation planting.
SMPC-04	South Milford Parish Council	Landscape and visual	With reference to the application documents and in particular figure 10.4.2 (Sheets 3 of 4) which defines the 'Zone of Theoretical Visibility (ZTV)', there will be no escape from the views of solar panels when walking or cycling from South Milford to Monk Fryston and then on through Hillam to Birkin. A point recognised in the 'NYC Strategic Committee Report' on 10th Feb 2026. Para 4.8 presents the Council's Landscape Officers concerns, that being: 'The potential negative cumulative effects on local communities….; the transformative scale of the Proposed Development in combination with other major development; the significance of the grid connection point at Monk Fryston substation; the pace of change and the erosion	The Applicant included the assessment of the landscape and visual effects of the Proposed Development within **ES Volume 1, Chapter 10: Landscape and Visual [APP-048]**. The LVIA has explicitly assessed the experience of users travelling through the landscape, including walkers, cyclists and road users along public rights of way and local roads. This includes representative viewpoints where visual receptors are identified as *"people travelling along PRoW"* and "*people travelling on local roads"*, with baseline descriptions confirming that views are experienced sequentially as a series of changing and transient views along routes, rather than as continuous or static panoramas. None of the PRoW identified in this part of the study area are promoted routes. The assessment demonstrates that, while there may be points along routes between

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
			of the landscape and visual baseline around those settlement areas affected.	South Milford, Monk Fryston, Hillam and Birkin where the Proposed Development is visible, these views are typically intermittent, filtered or glimpsed, often influenced by roadside hedgerows, woodland blocks and existing vegetation. With time, the mitigation planting, including hedgerows, woodland belts and field boundary reinforcement, will have established, resulting in further filtering and screening of views. Across the majority of PRoW and local road receptors, residual visual effects are assessed as minor adverse or negligible adverse, and therefore not significant, with visibility reduced to glimpsed or filtered views and the baseline character of the landscape partially restored. Additionally, it is important to clarify that the ZTV is a theoretical model which identifies the maximum potential visibility of any part the Proposed Development based solely on a digital surface model. It does not precisely reflect actual on-the-ground visibility as experienced by people, including the acuity of the eye, and does not take into account any proposed planting intended as mitigation. Nonetheless, **ES Volume 2, Figure 10.4.2: Zone of Theoretical Visibility (ZTV) - Screened [APP-094]** indicates a corridor of limited theoretical visibility along the route from South Milford to Monk Fryston and onward through Hillam, with the extent of predicted visibility increasing between Hillam and Birkin. The cumulative effects are assessed within Section 10.14 of **ES Chapter 10 [APP-048]**. The assessment results relevant to LVIA are further detailed within **Table 17-12 of ES Volume 1, Chapter 17: Cumulative and In-Combination Effects [APP-055]**.
SMPC-05	South Milford Parish Council	Agricultural Land and Soils	The site comprises productive agricultural land that contributes to local food security. We understand the importance of energy security but not at the expense of Best and Most Versatile (BMV) agricultural land. While global warming brings about the need to explore green energy production, global warming is also significantly impacting on farm production, with 2025 being particularly hard hit through drought. Energy production needs to be balanced alongside crop loss.	The effects of the Proposed Development on agricultural land, including land quality and productivity, are assessed in **ES Volume 1, Chapter 5: Agricultural Land and Soils [APP-043],** which states that food security has been considered. The Applicant does not consider that food security will be compromised by the Proposed Development (or solar energy more widely), particularly in the context that the 486 ha of BMV land within the Proposed Development (of which/ approximately 19.1 ha would be required for the permanent elements of the Proposed Development involving soil sealing) would represent approximately 1% of the likely BMV land in Selby District and 0.08% of the likely BMV land in the Yorkshire and Humber Region. It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the NPPF. Further, the Government's UK Solar Roadmap (2024) (Ref 27) states that solar development is not considered to compromise food security, and that climate change itself poses the greatest long-term risk to food production - a risk which the Proposed Development directly helps to address by providing a secure, low-carbon source of electricity. Government-led agricultural initiatives, such as the Sustainable Farming Incentive which is relaunching later in 2026, have prioritised soil health, environmental enhancement and climate resilience, recognising that long-term food security is influenced by a range of factors beyond land take alone, including soil condition, climate change and environmental pressures. The Proposed Development allows soils to remain in situ and undisturbed during operation, supporting soil recovery and long-term land health, with land reinstated and returned to agricultural use as far as

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				practicable following decommissioning. No permanent loss of agricultural land is anticipated.
SMPC-06	South Milford Parish Council	Agricultural Land and Soils	This 60-year project is not a temporary loss. The long-term loss of such land to industrial-scale infrastructure is not justified, particularly where alternative sites (including brownfield or lower grade land) and other renewable options have not been adequately explored.	An assessment of the potential effects of the Proposed Development on soils and agricultural land is provided in **ES Volume 1, Chapter 5: Agricultural Land and Soils [APP-043]**. For the panel areas, the Proposed Development will result in a temporary and reversible loss of agricultural land for the operational life of the Proposed Development. **ES Volume 1, Chapter 5: Agricultural Land and Soils [APP-043]** sets out that, as the Proposed Development is temporary, albeit long-term (lifetime of the Proposed Development), and reversible, the ISEP guidance indicates that the magnitude for the change of use of agricultural land for the panel areas, including all temporary construction elements and access tracks required, is low. The Proposed Development would have a direct, long-term, temporary and reversible moderate adverse effect on Grades 1 and 2 agricultural land, which is assessed as significant, and minor adverse effects on Subgrade 3a and 3b agricultural land, which is not significant. Of the 486 ha of BMV land within the Proposed Development, approximately 19.1 ha would be required for the permanent elements of the Proposed Development involving soil sealing, which would represent approximately 1% of the likely BMV land in Selby District and 0.08% of the likely BMV land in the Yorkshire and Humber Region. These effects are fully reported in the ES and are a matter for the Secretary of State to weigh in the planning balance against the need for the Proposed Development and its wider benefits. During the operational phase of the Proposed Development, the soil resource under the solar PV panels will remain largely undisturbed, and following decommissioning, the soil quality is expected to have improved from its current status, which is assessed as a significant moderate beneficial effect. Measures to avoid and minimise effects on soils and agricultural land are embedded within the Proposed Development design and secured through Schedule 2, Requirement 17 of the **Draft Development Consent Order (DCO) [APP-017]** which includes the preparation and implementation of a Soil Resource Management Plan (SRMP) in substantial accordance with the **Outline SRMP [APP-203]**. The SRMP will control soil handling, storage and reinstatement during construction, operation and decommissioning, and a requirement to prepare and implement a Decommissioning Environmental Management Plan in substantial accordance with the **oDEMP [APP-194]**, which is secured by Schedule 2, Requirement 19 of the **Draft Development Consent Order (DCO) [APP-017]**. In relation to suggestions that brownfield land or alternative locations should be used, these matters are addressed in **ES Volume 1, Chapter 3: Alternatives and Design Iteration [APP-041]** and in the **Statement of Need [APP-214]**. The Applicant has considered alternatives, including previously developed land and other forms of solar deployment, as part of the site selection and design evolution process. As explained in **ES Volume 3, Appendix 3.1: Site Selection Assessment Report (SSAR) [AS-019]** an appraisal of alternative sites within a 25km radius of the existing National Grid Monk Fryston Substation has been undertaken, which concludes that

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				there are no more suitable locations, including brownfield sites, within the 25km search area than the proposed location for the Proposed Development.
SMPC-07	South Milford Parish Council	Agricultural Land and Soils	As mentioned in the application documents (EN0110012/APP/LVS/06/01/06), the majority of the land within sites 6 and 7 is predominantly made up of clay and sand and is classified as Agricultural Land Classification (ALC) 2-3b (ranging from very good to moderate quality). As such, sizable areas are considered to be Best and Most Versatile agricultural land, which appear to have been selected simply because the land was easily available. There has been no attempt to avoid high quality land, contrary to Local Plan policy.	The Applicant followed a staged approach to site selection, taking into consideration a range of planning, environmental and operational factors and the project objectives. **ES Volume 1, Chapter 3: Alternatives and Design Iteration [APP-041]** and **ES Volume 3, Appendix 3.1: Site Selection Assessment Report (SSAR) [AS-019]** explains the methodology that has been applied when identifying and evaluating potential sites for the Proposed Development. It identifies a number of potential development areas for the Proposed Development that were considered as part of the site selection process and presents how each of those areas perform against a range of planning, environmental and operational constraints and opportunities and the project objectives. This report concludes that there are no more suitable and available locations within the search area than the proposed location for the Proposed Development, based on the criteria identified. The Applicant has had regard to agricultural land quality and relevant policy protections (as detailed in Sections 4.2 and 4.3 of **ES Volume 3, Appendix 3.1: Site Selection Assessment Report (SSAR) [AS-019])** in the design and site selection process and has sought, where practicable, to locate infrastructure on lower quality land An assessment of the potential effects of the Proposed Development on soils and agricultural land is provided in **ES Volume 1, Chapter 5: Agricultural Land and Soils [APP-043]**. This chapter considers baseline agricultural land quality, including Best and Most Versatile (BMV) land, and assesses likely significant effects arising from construction, operation and decommissioning of the Proposed Development, together with embedded mitigation measures. Of the land within Solar Development Site 6, 19 ha (19%) is confirmed as Subgrade 3a whereas 22.8 ha (23%) is confirmed as Grades 1 and 2. For Solar Development Site 7, 1.4 ha (16%) is confirmed as Grade 2 and 1.5 ha (18%) as subgrade 3a. The distribution of ALC grades is shown in **ES Volume 2, Figure 5.2: Agricultural Land Classification [APP-071].** During the operational phase of the Proposed Development, the soil resource under the solar PV panels will remain largely undisturbed, and following decommissioning, the soil quality is expected to have improved from its current status, which is assessed as a significant moderate beneficial effect.
SMPC-08	South Milford Parish Council	Alternatives and Design Iteration, and Site Selection	The proposal makes no attempt to outline why the sites selected were not more comprehensively assessed to consider a more compact proposal with possible alternative technologies (combination of wind and solar), delivering the same outcomes. The approach taken in this development appears to follow land availability irrespective of its cumulative impacts on environmentally sensitive areas, including habitat corridors, heritage assets, landscape harms, Green Belt and Best and Most Versatile land. By blindly taking the most commercially available land, the project has become fragmented in a manner that creates greater	As detailed in **ES Volume 1, Chapter 3: Alternatives and Design Iteration [APP-041]** and **ES Volume 3, Appendix 3.1: Site Selection Assessment Report (SSAR) [AS-019]**, the Applicant has followed a staged approach to assessment, taking into consideration a range of planning, environmental and operational factors and the project objectives. Potentially willing landowners with large scale land holdings within the search area was a consideration, however it is not the only consideration in the site selection process, given the policy tests that need to be passed by a project seeking consent. Regarding alternative technologies, further information is provided in Section 3.9 of **ES Volume 1, Chapter 3: Alternatives and Design Iteration [APP-041].** The Solar Development Sites are considered suitable for solar energy generation due to their

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
			impact on all these topics, over a considerably larger area.	topography and the irradiance levels in this part of the country, proximity to a point of connection, and availability. Given this, and the fact that the Applicant is a solar and battery development company which stands ready to help deliver the Government's ambition in its Clean Power Action Plan to achieve 45-47 GW of installed solar capacity by 2030, other technologies have not been considered by The Applicant in the development of the Proposed Development. That said, the Applicant has considered other technologies as alternatives in principle, including onshore wind. Whilst onshore wind Proposed Developments have been developed in areas close to the Proposed Development, the flat topography of the Site means that wind turbines would likely give rise to greater adverse landscape and visual effects, due to the height of the wind turbines, and the proximity to residential dwellings may give rise to adverse effects associated with shadow flicker and turbine noise. Further, as set out in the **Statement of Need [APP-214]**, by following good design principles, solar projects can generate a similar amount of energy per hectare of land as onshore wind, due to the distance required between turbines. Therefore, the use of onshore wind over solar does not offer any particular benefit in terms of electricity generation capacity per hectare.
SMPC-09	South Milford Parish Council	Alternatives and Design Iteration, and Site Selection	It is our opinion this project could have been designed to significantly reduce the current impact.	The Applicant notes this comment and, with regard to site selection and alternatives considered, has provided its response separately in the preceding paragraphs. With regard to the design of the Proposed Development, further details of how the design has evolved in order to reduce environmental impacts can be found in the **Design Approach Document (DAD) [APP-216].** Refinements include reduction in the Order Limits in sensitive areas to avoid archaeology, high-quality farmland, flood risk and visual impacts, a refined BESS layout, removal of substations, habitat planting, the inclusion of bird mitigation, and changes to fencing locations and alignment to allow commuting corridors for larger mammals. It is therefore considered that, on balance, the proposals represent the most appropriate Proposed Development for the location and respect the identified constraints.
SMPC-10	South Milford Parish Council	Agricultural Land and Soils	The 13-mile Cable Route Corridor will be laid across large areas of prime agricultural land, carving up the landscape, destroying vegetation and impacting on the local wildlife. The application documentation makes reference to the cable depth being up to 2m in areas, however, this may be reduced due to the geological conditions. UK regulations (The Electricity Safety, Quality and Continuity Regulations, 2002) states that the minimum depth requirement for underground cables on agricultural land is 1.8m. In areas where the cable depth is less than 1.8m, the ability to farm the land is significantly impaired. We are concerned that farming over the Cable Route Corridor can be significantly constrained due to the construction, maintenance, and long-term soil impacts, affecting crop yields, machinery access, and land recovery. Trenching can damage soil structure, remove topsoil and alter drainage patterns, particularly on heavier clay	The construction of the cable route has been assessed throughout the **Environmental Statement (ES) [APP-038 to APP-190]**, which considers the effects associated with these works. The ES assesses the cable route within defined parameters, including limits on working width and assumed trench dimensions (as identified within **ES Volume 1, Chapter 2: The Proposed Development [APP-040]** and, where relevant, the **Design Parameters and Commitments document [APP-217]**). The design commitments that have been made are secured within Schedule 2, Requirement 4 of the **Draft Development Consent Order (DCO) [APP-017]**. The Grid Connection Cables will be installed at a depth of 2m as set out in **ES Chapter 2: The Proposed Development [APP-040]**. The detailed design and construction of the cable route will be undertaken within the parameters authorised by the DCO. Measures to manage and minimise construction effects, including reinstatement of land following installation, are set out in the **Outline Construction Environmental Management Plan (oCEMP) [APP-192]**. The land use for the Cable Route Corridor would be temporary in nature; once the cable has been laid underground and completed, the land will be reinstated to its previous state and use, allowing for activities such as farming to continue. **ES Volume 1, Chapter 5: Agricultural Land and Soils [APP-043]** notes that the reinstatement of land would be

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
			soils, potentially increasing surface water and making the land less productive in the long-term.	in accordance with the **Outline SRMP [APP-203]** including the replacement of soils in the Cable Route Corridor to replicate the original soil profile and enable agricultural uses to continue following the installation of the cables. The Applicant disagrees with the interpretation of the (The Electricity Safety, Quality and Continuity Regulations, 2002). The legislation states: **14.**—(1) Every underground cable shall be kept at such depth or be otherwise protected so as to avoid, so far as is reasonably practicable, any damage or danger by reason of such uses of the land which can be reasonably expected. (The Electricity Safety, Quality and Continuity Regulations 2002).
SMPC-11	South Milford Parish Council	Cumulative and In-Combination Effects	The Parish Council has serious concerns about the cumulative impact of this proposal when considered alongside other existing and approved projects in the wider area. In addition to several large-scale developments, a review of renewable energy planning applications (Q2 2025) revealed that there were 15 Nationally Significant Infrastructure Projects (NSIP) and 71 lower-level renewable energy planning applications being considered within a 15-mile radius of South Milford – see supporting evidence Appendices (a) and (b).	Information regarding cumulative effects can be found in **Environmental Statement (ES) Volume 1, Chapter 17: Cumulative and In-Combination Effects [APP-055].** Through developing the ES, each topic chapter, where relevant, has included a cumulative impact assessment, considering other committed developments in the area and potential added impacts to aspects such as traffic. As outlined in Section 17.6 of **Chapter 17 [APP-055]** a 10 km radius was used to create an initial long list for consideration within the cumulative impacts assessment based on the zone of influences identified within the ES chapters. Where it was appropriate for technical topics to consider National Significant Infrastructure Projects (NSIPs) within a larger spatial area, a 20 km radius was used (for Biodiversity and Ornithology).The topic-specific conclusions are summarised in each relevant topic chapter of the ES and in Table 17-12 of **ES Volume 1, Chapter 17: Cumulative and In-Combination Effects [APP-055].** The cumulative assessment has taken into account nearby developments, including other solar projects, that fall within the relevant zones of influence for each topic to evaluate potential combined effects. Many of these developments are located within North Yorkshire, with some in nearby administrative areas due to the proximity of the Proposed Development to other administrative areas. The Applicant notes that Appendices (a) and (b) are not available for review. The cumulative assessment concludes there will be significant adverse cumulative landscape effects on two landscape character areas and visual effects at seven viewpoints, and a locally significant loss of BMV land (not significant at a regional level). No other significant adverse cumulative effects were found.
SMPC-12	South Milford Parish Council	Cumulative and In-Combination Effects	We are concerned that the Light Valley Solar project's 'Preliminary Environmental Information Report' (PEIR) focuses narrowly on the impact of this Proposed Development in isolation and fails to properly consider the combined effects on the landscape character, traffic levels, and residential amenity arising from multiple projects and developments operating concurrently or sequentially.	The Applicant makes note of this comment and refers the Parish Council to **ES Volume 1, Chapter 17: Cumulative and In-Combination Effects [APP-055]** which has reviewed the cumulative effects and in-combination effects comprehensively across different projects and receptors. Through developing the ES, each topic chapter, where relevant, has included a cumulative impact assessment, considering other committed developments in the area and potential added impacts to aspects such as traffic. As outlined in Section 17.6 of **Chapter 17 [APP-055]** a 10 km radius was used to create an initial long list for consideration within the cumulative impacts assessment based on the zone of influences identified within the ES chapters. Where it was appropriate for technical

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				topics to consider National Significant Infrastructure Projects (NSIPs) within a larger spatial area, a 20 km radius was used (for Biodiversity and Ornithology). The topic-specific conclusions are summarised in each relevant topic chapter of the ES and in Table 17-12 of **ES Volume 1, Chapter 17: Cumulative and In-Combination Effects [APP-055]**. The cumulative assessment has taken into account nearby developments, including other solar projects, that fall within the relevant zones of influence for each topic to evaluate potential combined effects. Many of these developments are located within North Yorkshire, with some in nearby administrative areas due to the proximity of the Proposed Development to other administrative areas. The cumulative assessment included within the ES concludes there will be significant adverse cumulative landscape effects on two landscape character areas and visual effects at seven viewpoints, and a locally significant loss of BMV land (not significant at a regional level). No other significant adverse cumulative effects were found.
SMPC-13	South Milford Parish Council	Cumulative and In-Combination Effects	There are significant existing developments ongoing in the area – see supporting evidence Appendix (c), which have not been taken into account. This proposal would contribute to an unacceptable cumulative industrialisation of the countryside and the application fails to sufficiently address the combined visual and environmental impact of multiple developments.	The Applicant notes that Appendix (c) is not available for review. Information regarding cumulative effects can be found in **ES Volume 1, Chapter 17: Cumulative and In-Combination Effects [APP-055]**. Table 17-12 provides the broad overall conclusions regarding cumulative effects for **ES Chapters 5 to 15 [APP-043 to APP-053].** In addition, through developing the ES, each topic chapter, where relevant, has included a cumulative impact assessment, considering other committed developments in the area and potential added impacts to aspects such as landscape and visual. The cumulative assessment has taken into account nearby developments, including other solar projects, that fall within the relevant zones of influence for each topic to evaluate potential combined effects. Chapter 17 sets out the approach to establishing the list of developments to be included in the cumulative assessment. The methodology and approach undertaken aligns with PINS advice including establishing an initial long list of developments and then reducing this to a short list based on specific thresholds. As outlined in Section 17.6 of **Chapter 17 [APP-055]** a 10 km radius was used to create an initial long list for consideration within the cumulative impacts assessment based on the zone of influences identified within the ES chapters. Where it was appropriate for technical topics to consider National Significant Infrastructure Projects (NSIPs) within a larger spatial area, a 20 km radius was used (for Biodiversity and Ornithology). The short list of cumulative Proposed Developments is included in Table 17-11 **ES Volume 3, Appendix 17.1: Long List of Developments to Inform Cumulative Assessment [APP-189]** and shown visually on **ES Volume 2, Figure 17.1: Locations of Short List Cumulative Schemes [APP-142],** alongside a long list of 196 proposed developments, included in Table 2-1 of **ES Volume 3, Appendix 17.1: Long List of Developments to Inform Cumulative Assessment [APP-189].** The cumulative assessment concludes there will be significant adverse cumulative landscape effects on two landscape character areas and visual effects at seven

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				viewpoints, and a locally significant loss of BMV land (not significant at a regional level). No other significant adverse cumulative effects were found.
SMPC-14	South Milford Parish Council	Landscape and visual	The development would adversely affect the amenity of nearby residents through visual impact.	A detailed Landscape and Visual Impact Assessment (LVIA) has been undertaken and is reported in **ES Volume 1, Chapter 10: Landscape and Visual [APP-048]**. The LVIA assesses the likely significant effects of the Proposed Development on both landscape character and visual amenity during construction, operation and decommissioning, in accordance with the relevant legislation, policy, standards and guidance set out in **Chapter 10, Section 10.3 [APP-048]**. With respect to residential visual amenity, Landscape Institute Technical Guidance Note (TGN) 01/24 explains in point 6(1) that views from houses and individual properties are a matter of private amenity, noting that it is an established planning principle that there is no right to a view. The LVIA has not identified any significant adverse residual effects on the views of residents that would breach the Residential Visual Amenity threshold and cause serious harm to the living conditions of residents (major adverse) and therefore a Residential Visual Amenity Assessment (RVAA) has not been carried out. Further information is provided in Table 10-5 of **ES Volume 1, Chapter 10: Landscape and Visual [APP-048]**.
SMPC-15	South Milford Parish Council	Glint and glare	The development would adversely affect the amenity of nearby residents through potential glint and glare.	The Applicant acknowledges these comments. As part of the Application, the Applicant submitted a **Glint and Glare Assessment (ES Volume 3, Appendix 16.4) [APP-186],** where the Applicant considered the impact of the Proposed Development from a glint and glare including impacts on residential properties, and this is discussed further in **ES Volume 1, Chapter 16: Other Environmental Matters [APP-054]**. Temporary significant impacts were predicted for some roads, rail routes, and dwellings. However, with mitigation in the form of advanced planting, which has been secured in the **Outline Landscape and Ecological Management Plan (oLEMP) [APP-195],** these effects would be reduced to not significant. The detailed LEMP must be approved by the relevant planning authority, in accordance with Requirement 6 in Schedule 2 to the **Draft Development Consent Order (DCO) [APP-017].**
SMPC-16	South Milford Parish Council	Noise and vibration	The development would adversely affect the amenity of nearby residents through recurrent noise.	The assessment of noise associated with the Proposed Development is presented in **ES Volume 1, Chapter 11: Noise and Vibration [APP-049].** The assessment of operational noise is undertaken in accordance with relevant standards and guidance, with likely impacts and effects set out in Section 11.9. This assessment concludes that although exceedances are predicted at some of the closest sensitive receptors, no significant noise effects are predicted during operation. The assessment of construction noise and vibration is undertaken in accordance with the methodologies outlined in Section 11.5 of **ES Volume 1, Chapter 11: Noise and Vibration [APP-049].** The assessment references British Standard BS 5228:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites - Noise (Part 1) and Vibration (Part 2). Details of the assessment including plant equipment assumptions and predicted construction noise levels are presented in **ES Volume 3, Appendix 11.2: Construction Noise and Vibration Assumptions and Results [APP-172].** The assessment, which includes noise emissions from horizontal directional drilling and piling, concludes that adverse effects

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				from construction noise and vibration are not significant, following the application of best practicable measures mitigation approaches. Accordingly, the effects of noise on nearby residential receptors are assessed as not significant.
SMPC-17	South Milford Parish Council	Air Quality	The development would adversely affect the amenity of nearby residents through reduced air quality, including dust.	A Construction Dust Assessment (CDA) is included in **ES Volume 3, Appendix 16.1: Construction Dust Assessment [APP-183]**. The assessment acknowledges a high risk of dust during construction, but determines the resulting effect, including from traffic movements on sensitive human and ecological receptors and from construction activity, would be not significant. As discussed in **ES Volume 1, Chapter 16: Other Environmental Matters [APP-054]** it has been concluded that with the appropriate best practice mitigation measures suitable for high-risk sites in place, as set out within **ES Volume 3, Appendix 16.1: Construction Dust Assessment [APP-183]** and secured via the **oCEMP [APP-192]**, including monitoring during the construction phase, provision to erect barriers around dusty activities, and requirement to produce a Dust Management Plan (DMP), there is likely to be no significant effects on existing receptors from the dust-generating activities onsite.
SMPC-18	South Milford Parish Council	Noise and vibration	The development would adversely affect the amenity of nearby residents through vibration.	The Applicant is confident that the proposed management and mitigation measures set out in the **Environmental Statement [APP-038 to APP-190]** are comprehensive and robust and that the Proposed Development aligns with national and local planning policy; this is outlined in the **Planning Statement [APP-207]**. As set out in **ES Volume 1, Chapter 11: Noise and Vibration [APP-049]**, the construction plant vibration levels have been calculated in accordance with the procedures in BS 5228-2. Paragraph 20.1.26 of **ES Chapter 11: Noise and Vibration [APP-049]** states that vibration from construction activities is anticipated to result in levels well below the threshold for risk of cosmetic damage to any properties. As presented in **ES Volume 1, Chapter 11: Noise and Vibration [APP-049]**, based on guidance provided in British Standards BS5228-2 and BS7385-2, as well as the Design Manual for Roads and Bridges (DMRB) LA 111, construction traffic vibration is unlikely to be of sufficient magnitude to result in adverse impacts on people. Risk of any damage (even cosmetic damage) to any buildings or other structures starts to occur at levels much higher than those that are perceptible to people. As such, no vibration adverse impacts are expected and are scoped out from the EIA assessment. Extensive work was carried out by the Transport and Road Research Laboratory (TRRL Research Report 246, Traffic induced vibration in buildings) that showed the levels of vibration caused by road traffic, even passing very close to historic buildings and on uneven surfaces, did not present a damage risk. The **oCEMP [APP-192]** and **oCTMP [APP-201]** include mitigation measures to control and minimise any potential noise and vibration impacts resulting from the construction of the Proposed Development. Where vibration is perceptible for some residents, the

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				oCEMP requires engagement with residents to provide reassurance that properties will not be at risk of damage, particularly where vibration is perceptible.
SMPC-19	South Milford Parish Council	Landscape and visual	The development would adversely affect the amenity of nearby residents through lighting.	As set out in **Environmental Statement Volume 1, Chapter 10: Landscape and Visual [APP-048]**, with reference to the England's Light Pollution and Dark Skies map published by CPRE: The Countryside Charity, the Site and surrounding area is influenced by some lighting sources and no part of the area is considered to fall within the darkest night time sky category. As set out in **ES Chapter 2: The Proposed Development [APP-040]**, it is not anticipated that the Proposed Development would be lit. The exception to this is the BESS and substations where movement sensory triggered lighting will be needed and will follow the best practice to reduce spill light. These elements are located away from the residential receptors and are not expected to significantly affect the amenity of nearby residents.
SMPC-20	South Milford Parish Council	Noise and vibration	The development would adversely affect the amenity of nearby residents through increased disturbance in a previously quiet rural area.	The assessment of operational noise is undertaken in accordance with the British Standard 4142:2014+A1:2019 Methods for rating and assessing industrial and commercial sound, as presented in Section 11.5 of **ES Volume 1, Chapter 11: Noise and Vibration [APP-049]**. The assessment of operational likely impacts and effects are provided in Section 11.9. An acoustic feature correction for clearly perceptible tonality has been applied as a reasonable worst-case scenario to determine rating sound levels. Details of noise modelling results and assumptions are presented in **ES Volume 3, Appendix 11.3: Operational Noise and Vibration Assumptions and Results [APP-173]** and **Volume 2, Figure 11.3: Operational Noise Modelling Results [APP-100]**. This assessment concludes that although exceedances are predicted at some of the closest sensitive receptors, the effects of operational noise are assessed as not significant. This is because the design of the Proposed Development has included embedded mitigation measures to manage noise and vibration impacts from an early stage in the design process. Details of mitigation measures are presented in Section 11.8 of Chapter 11.
SMPC-21	South Milford Parish Council	Human Health	Local communities fear the erosion of their rural identity, the loss of their farming history and the impact on local wildlife. The imbalance between the national energy benefits and concentrated local impacts are a material consideration.	The Applicant acknowledges that any adverse effects from the Proposed Development are more likely to be felt locally than the largely wider-scale benefits of the Proposed Development. Where the Proposed Development is anticipated to benefit local people more specifically, this is done through providing onsite permissive paths to increase access to the countryside, providing improved landscape planting through reinforcing existing hedgerows and planting of new trees and providing biodiversity net gains through habitat improvements. These are set out in detail with the **Planning Statement [APP-207].** That notwithstanding, the Applicant is committed to providing a Community Benefit Fund to allow for community-driven benefits that are not necessarily associated with the Proposed Development itself. The purpose is to establish a means to recognise local community needs that the Applicant wants to be able to contribute towards in recognition of the local impact of the Proposed Development. However, the Applicant recognises that this Fund should not be taken into account in the planning balance for

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				the Proposed Development. As set out in the **Planning Statement [APP-207]** the Proposed Development will also provide localised benefits including Employment generation and Gross Value Added contributions during the construction and decommissioning phases as well as local recruitment and procurement and supporting local education and skills. **ES Volume 1, Chapter 5: Agricultural Land and Soils [APP-043]** notes that for the solar panel areas the Proposed Development will result in a temporary and reversible loss of agricultural land for the operational life of the Proposed Development rather than a permanent loss. The Applicant confirms that none of the land will be considered brownfield automatically after decommissioning. The expectation is that the land will return to farming, although the Applicant cannot dictate what will happen to the land post-decommissioning when the Applicant no longer has an interest in the land. However, any proposal taken forward by a landowner after decommissioning would be seen in the context that the lawful use, post-solar, would be the land use that is currently taking place on that land. Potential impacts of the Proposed Development on ecology and biodiversity (wildlife) are assessed in **ES Volume 1, Chapter 6: Biodiversity [APP-044]** and **Chapter 12: Ornithology [APP-050]**, which considers baseline conditions and evaluates likely effects during construction, operation and decommissioning. The assessment identifies embedded and additional mitigation measures and concludes that, with these measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated. A comprehensive package of habitat retention, creation, enhancement and long-term management measures is proposed to avoid, reduce and mitigate impacts and to deliver Biodiversity Net Gain. These include the protection of existing habitats, creation of new habitats, and long-term ecological management to improve habitat quality over the lifetime of the Proposed Development. The ecological mitigation and enhancement proposals, including BNG measures, are illustrated indicatively on the **Outline Environmental Masterplans (OEM) [PDA-003 to PDA-010]** and detailed in the **Outline Landscape and Ecological Management Plan (oLEMP) [APP-195]** and the **Outline Bird Mitigation Area Management Plan (oBMAMP) [APP-205]**.
SMPC-22	South Milford Parish Council	Transport and access	The Parish Council objects to the proposal on highway safety and transport grounds. The proposal raises concerns with regards to highway safety, the risk of congestion, damage to road surfaces and verges, and disruption to local residents.	The Applicant notes this comment. **ES Volume 1, Chapter 14: Traffic and Movement [APP-052]** presents the impact assessment undertaken for traffic and details the likely significant effects of the Proposed Development on traffic and movement. The **Transport Assessment (TA) [APP-178]** has been prepared to assess the impact of the Proposed Development on the transport network during construction. The conclusions of the TA are set out in full in Section 7; overall, the TA concludes that any temporary impacts from the Proposed Development can be managed through the final Construction Traffic Management Plan (CTMP), and there is not expected to be any long-term significant impacts on the transport network. An **Outline Construction Traffic Management Plan (oCTMP, [APP-201])** has been prepared to identify the routes that should be used by construction traffic, based on the findings of the TA These routes take into account the existing condition of the road and seek, where practicable, to avoid residential areas. The oCTMP also includes measures to minimise impacts during construction by reducing HGV movements during the peak hours and

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				managing employee movements. **ES Volume 1, Chapter 14: Traffic and Movement [APP-052]** includes a range of mitigation measures including the already mentioned implementation of an **Outline Construction Traffic Management Plan (oCTMP, [APP-201])** to formalise measures mitigating construction-related effects; the provision of suitable access points for construction vehicles. The provision of appropriate protection or separation between existing Public Rights of Way (PRoW) and construction routes where necessary is covered within the **Outline Public Rights of Way Management Plan (oPROWMP) [APP-199].** Further measures include restricting HGV and Abnormal Indivisible Load (AIL) movements to designated routes, undertaking improvement works where required to facilitate AIL access, and allowing within the Order Limits for the provision of passing places on narrow rural roads to enable the safe movement of construction vehicles. Where needed, these passing places would be located away from residential properties. Temporary Traffic Management (TTM) measures would also be implemented where required. With regards to the condition of the road, there is a commitment within the oCTMP for a pre-commencement condition survey and a commitment to resolving any damage to the highway that can be attributed to construction activities.
SMPC-23	South Milford Parish Council	Transport and access	The application has not demonstrated that the local highway network can safely accommodate the scale and cumulative volume of traffic associated with the construction, maintenance, and decommissioning of this proposal, particularly when considered in conjunction with other developments in the area.	The Applicant notes this comment. A **Transport Assessment (TA) [APP-178]** has been undertaken. The TA has assessed the road network capacity and existing transport conditions. The assessment takes into account other committed developments as part of the cumulative assessment scenario. The cumulative assessment findings show that none of the committed developments will impact the routes that have a greater than 10% increase in traffic from the Proposed Development. Furthermore, the Proposed Development has a 1 to 2% impact on traffic flows on those routes impacted by other committed developments. Mitigation in the **Outline Construction Traffic Management Plan (oCTMP, [APP-201])** includes measures to manage construction vehicle arrival and departure times to avoid the network peak hours. Construction phasing of all the committed developments will also be considered when updating the CTMP, to ensure that the construction routing of traffic associated with the Proposed Development would not have an unacceptable cumulative effect on local traffic conditions. These traffic management measures, to be secured through the detailed CTMP, will further minimise the magnitude of any cumulative impact.
SMPC-24	South Milford Parish Council	Transport and access	The Light Valley Solar proposal would result in additional Large Goods Vehicle (LGV) and abnormal load movements during construction, together with ongoing servicing and maintenance traffic. The Parish Council considers that the local highway network is unsuitable for the level of LGV movements associated with construction, maintenance, and decommissioning and we do not consider that the Applicant has demonstrated that the type, frequency, and routing of	The Applicant notes this comment. An **Outline Construction Traffic Management Plan (oCTMP, [APP-201])** has been prepared to identify the routes that should be used by construction traffic. These routes take into account the existing condition of the road and seek, where practicable, to avoid residential areas. With regards to the condition of the road, there is a commitment within the oCTMP for a pre-commencement condition survey and a commitment to resolving any damage to the highway that can be attributed to construction activities. The Applicant reiterates its commitment to road safety, and notes that with implementation of the final version of the **Outline Construction Traffic Management**

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
			construction traffic can be safely accommodated on the local road network without detriment to highway safety.	**Plan (oCTMP, [APP-201])**, roads would be no less safe than they currently are, hence the provision of Highway Improvement Areas (HIAs). HIAs are sections of the highway network where localised improvements are proposed, such as improvements to the road edge where it is deteriorated and provision of temporary passing places within the existing highways boundary, traffic management, and provision of visibility splays, or temporary highway and traffic works required to safely accommodate the Abnormal Indivisible Load (AIL) deliveries. While these measures will benefit construction traffic, including AILs, they will also enhance road safety and general usability for all road users; for example, the provision of passing places on narrower roads enabling regular and construction traffic to pass each other with ease.
SMPC-25	South Milford Parish Council	Transport and access	The current volume of traffic around the A162 Sherburn Bypass and the A63 Selby Road in both directions from the JP Plant roundabout is already considered by North Yorkshire Council to be an over-capacity road network, as outlined in the 'Transport Assessment' (06.03.14.01) and the 'Outline Construction Traffic Management Plan' (oCTMP - 07.12).	At a meeting with North Yorkshire Council, they advised that the A63/A162 roundabout is operating at capacity. As such, improvement works are anticipated at the junction, with an intended completion date of 2028, to provide additional capacity to accommodate background and committed development traffic. Should these works not be completed prior to or during the construction period, the **Outline Construction Traffic Management Plan (oCTMP) [APP-201]** provides for alternative construction routes to be agreed with the relevant highway authority where required. The **Transport Assessment (TA) [APP-178]** has been prepared to assess the impact of the Proposed Development on the transport network during construction. The conclusions of the TA are set out in full in Section 7; overall, the TA concludes that any temporary impacts from the Proposed Development can be managed through the final Construction Traffic Management Plan (CTMP), and there is not expected to be any long-term significant impacts on the transport network.
SMPC-26	South Milford Parish Council	Transport and access	Of particular concern is the residual cumulative impact of construction and operational traffic associated with multiple developments accessing the same routes over extended or overlapping time periods. The approved expansion of the Sherburn Industrial Estate (Sherburn 2 and 42) and the Gascoigne Interchange development will add a further 3000 more daily car and LGV journeys onto the local road network. As such, the application does not adequately reflect the combined effects of these proposals on the road network, capacity, or safety.	The Applicant notes this comment. A **Transport Assessment (TA) [APP-178]** has been undertaken. The TA has assessed the road network capacity and existing transport conditions. The assessment takes into account other committed developments as part of the cumulative assessment scenario. The cumulative assessment findings show that none of the committed developments will impact the routes that have a greater than 10% increase in traffic from the Proposed Development. Furthermore, the Proposed Development has a 1 to 2% impact on traffic flows on those routes impacted by other committed developments. At a meeting with North Yorkshire Council, they advised that the A63/A162 roundabout is operating at capacity. As such, improvement works are anticipated at the junction, with an intended completion date of 2028, to provide additional capacity to accommodate background and committed development traffic. Mitigation in the **Outline Construction Traffic Management Plan (oCTMP, [APP-201])** includes measures to manage construction vehicle arrival and departure times to avoid the network peak hours. Construction phasing of all the committed developments will also be considered when updating the CTMP, to ensure that the construction routing of traffic associated with the Proposed Development would not have an unacceptable cumulative effect on local traffic conditions. These traffic management measures, to be secured through the detailed CTMP, will further minimise the magnitude of any cumulative impact.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
SMPC-27	South Milford Parish Council	Transport and access	Common Lane, South Milford, is a constrained rural road with limited width, restricted opportunities for vehicles to pass, soft and vulnerable verges, and no formal provision for pedestrians, cyclists or horse riders. Although this road is subject to a 60mph limit, it connects two Public Rights of Way (PRoW) and is therefore regularly used by vulnerable road users, local residents and agricultural traffic. The junction of Common Lane with the A162 Sherburn Bypass represents a particular constraint due to its geometry and visibility limitations, with congestion already occurring during peak commuter travel periods. The Parish Council is aware of recorded collisions and ongoing safety concerns along this section of the A162 and at nearby junctions. North Yorkshire Council has recently proposed a reduced 40mph speed limit on stretches of the A162 around Sherburn-in-Elmet (north and south of the main roundabout), specifically citing safety concerns and the unsuitability of the previous 60mph limit, given local road conditions and development pressures.	The Applicant notes this concern. Public Rights of Way (PRoW) and pedestrian routes within the study area have been identified and assessed as part of the **Transport Assessment (TA) [APP-178]**. Routes for construction traffic have been chosen to avoid and minimise the impact on settlements where possible. The Environmental Statement includes an assessment of fear and intimidation in **ES Volume 1, Chapter 14: Traffic and Movement [APP-052]**. This calculates a degree of hazard score, which takes into account the average two-way flow, the HGV composition and the vehicle speed. Table 14-30 and Table 14-31 shows that Common Lane, South Milford is subject to a 'Small' level of fear and intimidation in both the baseline (existing) and 'with construction' scenarios. Therefore, the temporary increase in traffic during the construction phase is not expected to significantly alter the levels fear and intimidation. The Applicant reiterates its commitment to road safety, and notes that with implementation of the final version of the **Outline Construction Traffic Management Plan (oCTMP) [APP-201]**, roads should be no less safe than they currently are. Construction activities affecting pedestrian routes would be temporary and managed through the implementation of the CTMP. Measures may include temporary diversions, signage, and traffic management to maintain safety for users. Construction traffic will also be controlled through routing strategies and timing restrictions, reducing interaction with pedestrians where practicable. On this basis, any impacts on pedestrian connectivity would be temporary and appropriately mitigated.
SMPC-28	South Milford Parish Council	Transport and access	The Parish Council therefore concludes that the Applicant has failed to demonstrate that the residual cumulative impacts on the road network would not be severe, and that the proposal is contrary to TR6: National Planning Policy Framework: Assessing Transport Impacts.	The Applicant notes this comment. A **Transport Assessment (TA) [APP-178]** has been undertaken. The TA has assessed the road network capacity and existing transport conditions. The assessment takes into account other committed developments as part of the cumulative assessment scenario. The cumulative assessment findings show that none of the committed developments will impact the routes that have a greater than 10% increase in traffic from the Proposed Development. Furthermore, the Proposed Development has a 1 to 2% impact on traffic flows on those routes impacted by other committed developments. At a meeting with North Yorkshire Council, they advised that the A63/A162 roundabout is operating at capacity. As such, improvement works are anticipated at the junction, with an intended completion date of 2028, to provide additional capacity to accommodate background and committed development traffic. Mitigation in the **Outline Construction Traffic Management Plan (oCTMP, [APP-201])** includes measures to manage construction vehicle arrival and departure times to avoid the network peak hours. Construction phasing of all the committed developments will also be considered when updating the CTMP, to ensure that the construction routing of traffic associated with the Proposed Development would not have an unacceptable cumulative effect on local traffic conditions. These traffic management measures, to be secured through the detailed CTMP, will further minimise the magnitude of any cumulative impact.

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SMPC-29	South Milford Parish Council	Biodiversity and Ecology	The Parish Council is not satisfied that the submitted ecological information demonstrates a clear net gain in biodiversity. Concerns remain regarding habitat disturbance, the removal of hedging, the loss of wildlife corridors, and insufficient long-term management and monitoring commitments.	Potential impacts of the Proposed Development on ecology and biodiversity are assessed in **ES Volume 1, Chapter 6: Biodiversity [APP-044]** and **Chapter 12: Ornithology [APP-050]**, which considers baseline conditions and evaluates likely effects during construction, operation and decommissioning. The assessment identifies embedded and additional mitigation measures and concludes that, with these measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated. A comprehensive package of habitat retention, creation, enhancement and long-term management measures is proposed to avoid, reduce and mitigate impacts and to deliver Biodiversity Net Gain. These include the protection of existing habitats, creation of new habitats, and long-term ecological management to improve habitat quality over the lifetime of the Proposed Development. The ecological mitigation and enhancement proposals, including BNG measures and habitat monitoring, are illustrated indicatively on the **Outline Environmental Masterplans (OEM) [PDA-003 to PDA-010]** and detailed in the **Outline Landscape and Ecological Management Plan (oLEMP) [APP-195]** and the **Outline Bird Mitigation Area Management Plan (oBMAMP) [APP-205]**. These outline plans also set out the management prescriptions for the landscaping and ecological measures that are provided. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, Bird Mitigation Area Management Plan and the BNG Strategy is secured through Requirements 6, 7 and 8 (respectively) in Schedule 2 to the **Draft Development Consent Order (DCO) [APP-017]**, ensuring that ecological mitigation and enhancement measures are delivered, monitored and maintained throughout the lifetime of the Proposed Development.
SMPC-30	South Milford Parish Council	Water Resources and Flood Risk	The cumulative impact of panel coverage and construction across multiple sites will increase water runoff from panels, soil compaction and erosion in the long-term.	The **Outline Drainage Strategy (ODS) [APP-182]** sets out the Applicant's assessment of surface water runoff from the Solar PV areas. The solar panels are not expected to increase runoff volumes or peak runoff rates, or adversely affect time to peak, compared with pre-development conditions. Utilising grass or wildflower cover will help to enhance interception and root growth, promoting effective rainwater infiltration and interception. Case studies such as Ref. 20 within the **ODS [APP-182]** indicate that where panels are installed above well-maintained grassland, changes in runoff volume and peak discharge are negligible. The same study demonstrates that ground cover is a key factor in controlling runoff, with well-managed vegetation helping to maintain drainage performance across solar array areas. Furthermore, the Proposed Development is in accordance with all relevant national standards and guidelines on the management of surface water, including NPS EN-3 on the management of runoff from solar panels. The potential effects of soil compaction during construction have been considered within the **Outline Drainage Strategy (ODS) [APP-182]** and the **Outline Construction Environmental Management Plan (oCEMP, [APP-192])** which considers appropriate construction-phase measures to be implemented to manage this risk. Furthermore, the **Outline Soil Resource Management Plan (oSRMP) [APP-203]** sets out best practice measures to avoid damage to soil structure, including measures

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				to both minimise ground compaction and ensure remedial action is undertaken where ground is compacted.
SMPC-31	South Milford Parish Council	Agricultural Land and Soils	The PEIR acknowledges a high risk of permanent soil degradation particularly across Sites 6 and 7 through compaction and poor drainage. The area is already vulnerable to surface water impact, especially given the clay and sandy soil composition. The loss of vegetation and soil compaction during construction will exacerbate the flood risks.	The potential effects of soil compaction during construction have been considered within the **Outline Drainage Strategy (ODS) [APP-182]** and the **Outline Construction Environmental Management Plan (oCEMP, [APP-192])** which considers appropriate construction-phase measures to be implemented to manage this risk. Furthermore, the **Outline Soil Resource Management Plan (oSRMP) [APP-203]** sets out best practice measures to avoid damage to soil structure, including measures to both minimise ground compaction and ensure remedial action is undertaken where ground is compacted. The **Outline Drainage Strategy (ODS) [APP-182]** sets out the Applicant's assessment of surface water runoff from the Solar PV areas. The solar panels are not expected to increase runoff volumes or peak runoff rates, or adversely affect time to peak, compared with pre-development conditions. Utilising grass or wildflower cover will help to enhance interception and root growth, promoting effective rainwater infiltration and interception. Case studies such as Ref. 20 within the **ODS [APP-182]** indicate that where panels are installed above well-maintained grassland, changes in runoff volume and peak discharge are negligible. The same study demonstrates that ground cover is a key factor in controlling runoff, with well-managed vegetation helping to maintain drainage performance across solar array areas. Furthermore, the Proposed Development is in accordance with all relevant national standards and guidelines on the management of surface water, including NPS EN-3 on the management of runoff from solar panels.
SMPC-32	South Milford Parish Council	Construction and decommissioning	Although the application describes the development as temporary, it would remain in place for a significant number of years. There is insufficient detail as to how the site would be restored at the end of its operational life or how this would be guaranteed. The application states that the underground cables will remain and will not be removed as part of the decommissioning process and will therefore result in long-term scarring and limit the future use of the land affected.	The decommissioning of the Proposed Development has been assessed within the **Environmental Statement (ES) [APP-038 to APP-190]** which considers the effects associated with decommissioning activities. As part of the assessment, appropriate mitigation measures are incorporated into the Proposed Development. Information on decommissioning activities is provided within the **ES [APP-038 to APP-190]** and within the **Outline Decommissioning Environmental Management Plan (oDEMP) [APP-194]**. At the end of the Proposed Development's operational life, it would be decommissioned and the land restored to its original use and condition as far as practicable. Decommissioning may take between 24-36 months, however it is possible that decommissioning may take less time, and this will be confirmed in the final DEMP. Decommissioning will involve the removal of all solar infrastructure, including the solar PV modules, and BESS and all associated infrastructure (including On-Site Cabling) to 1.2 m bgl; to be recycled or disposed of in accordance with good practice and processes at that time. Any piles would be removed. The mode of dealing with Interconnecting Cables and Grid Connection Cables during decommissioning will be dependent upon government policy and good practice at that time. Currently, the most environmentally acceptable option is considered to be leaving

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				the cables in situ, as this avoids disturbance to overlying land and habitats and to neighbouring communities. All above ground infrastructure will be removed and the land restored to its current use and to the landowner. Post decommissioning it is up to the landowners who will choose how the land is to be used and managed. It is likely that established habitats such as hedgerows and woodland would be retained. Measures to manage and minimise disruption during decommissioning are set out in the **Outline Decommissioning Environmental Management Plan (oDEMP) [APP-194]**. This explains how mitigation measures identified in the **ES [APP-038 to APP-190]** will be implemented during decommissioning and includes controls for working hours, noise, lighting, traffic management, pollution prevention, waste management and community liaison. A detailed Decommissioning Environmental Management Plan will be prepared substantially in accordance with the **Outline Decommissioning Environmental Management Plan (oDEMP) [APP-194]** and must be submitted to and approved by the relevant local planning authority prior to the commencement of decommissioning. This is secured through Requirement 19 in Schedule 2 of the **Draft Development Consent Order (DCO) [APP-017]**.
SMPC-33	South Milford Parish Council	Community benefit	The proposal offers little or no direct benefit to the local community, despite the scale of impact borne by Parish residents. Evidence from other solar developments has shown that there is limited long-term employment benefits in the local area, compared to the scale of land take. Community involvement and benefit Proposed Developments should be proportionate to the size and impact of the development.	The Applicant is committed to providing a Community Benefit Fund to allow for community driven benefits that are not necessarily associated with the Proposed Development itself as the Applicant agrees that the communities closest to the project should benefit from it. The Applicant will continue to engage locally to shape a community Benefit Fund that works for the community.
SMPC-34	South Milford Parish Council	Transport and Access	Due to the limited number of Public Rights of Way (PRoW) in South Milford and the lack of a footpath along Lumby Lane leading to Monk Fryston, Common Lane (South Milford) is a regular pedestrian walking route linking South Milford and Monk Fryston. If the proposal was to be approved, this would further limit the local foot access routes between the villages, as detailed in the 'Selby Landscape Character Assessment', Character Area 8: Access and Recreation (2019).	The Applicant notes this concern. Public Rights of Way (PRoW) and pedestrian routes within the study area have been identified and assessed as part of the **Transport Assessment (TA) [APP-178]**. Routes for construction traffic have been chosen to avoid and minimise the impact on settlements where possible. The Environmental Statement includes an assessment of fear and intimidation in **ES Volume 1, Chapter 14: Traffic and Movement [APP-052]**. This calculates a degree of hazard score, which takes into account the average two-way flow, the HGV composition and the vehicle speed. Table 14-30 and Table 14-31 shows that Common Lane, South Milford is subject to a 'Small' level of fear and intimidation in both the baseline (existing) and 'with construction' scenarios. Therefore, the temporary increase in traffic during the construction phase is not expected to significantly alter the levels fear and intimidation. The Applicant notes that Common Lane will remain available for use by pedestrians, and in addition to the existing Public Rights of Way network, permissive paths within the Order Limits will provide opportunities to maintain and enhance local connectivity. The Applicant reiterates its commitment to road safety, and notes that with implementation of the final version of the **Outline Construction Traffic Management Plan (oCTMP) [APP-201]**, roads should be no less safe than they currently are. Construction activities affecting pedestrian routes would be temporary and managed

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				through the implementation of the CTMP. Measures may include temporary diversions, signage, and traffic management to maintain safety for users. Construction traffic will also be controlled through routing strategies and timing restrictions, reducing interaction with pedestrians where practicable. The provision of appropriate protection or separation between existing Public Rights of Way (PRoW) and construction routes where necessary is covered within the **Outline Public Rights of Way Management Plan (oPROWMP) [APP-199].** On this basis, any impacts on pedestrian connectivity would be temporary and appropriately mitigated.
SMPC-35	South Milford Parish Council	Battery safety	North Yorkshire Fire & Rescue Service's (NYFRS) guidance relating to fires at Battery Energy Storage Systems (BESS) and large-scale solar farm installations, recognises the growing use of lithium-ion batteries in Battery Energy Storage Systems (BESS) and acknowledges that these systems present unique risks (thermal runaway, toxic emissions and long-duration fires) compared to typical fire hazards. NYFRS states that the location and access provisions of proposed solar/BESS sites directly influence the ability of the Fire Service to respond safely and effectively. They acknowledge that local firefighting capability exists but has its limitations, especially for large-scale BESS incidents, which require specialist planning and resources. Responding to such incidents requires clear, permanent access with room for Fire Appliances to approach from multiple directions and manoeuvre safely. The volume of traffic along the A63 and especially around the A162 roundabouts would severely impact on the NYFRS' ability to respond to incidents at the Monk Fryston BESS.	Full details regarding the approach to battery safety are set out in the **Outline Battery Safety Management Plan (oBSMP) [APP-196]**. As set out in the **oBSMP [APP-196]**, the final BESS design and site layout should minimise the requirement for direct NYFRS intervention. NYFRS intervention in worst-case scenarios would typically be limited to boundary cooling of adjacent BESS and Energy Storage System (ESS) units to prevent the fire from spreading. A Detailed BSMP will be submitted to and approved in consultation with NYFRS, the Environment Agency (EA), and North Yorkshire Council prior to the commencement of the works for the BESS. It will be clearly communicated in the Emergency Response Plan (ERP) to be produced. Measures which will be incorporate measures to: - ensure that fire smoke and any release of toxic gases do not significantly impact site operatives, first responders and the local community - ensure that fire water runoff is contained and tested before release or, if necessary, removed by tanker and treated offsite. The NYFRS have been consulted, and engagement will continue across the project lifecycle. With regard to traffic volumes on the local road network affecting access, the Design Manual for Roads and Bridges (DMRB) Advice Note TA 79/99 (Traffic Capacity of Urban Roads) has been withdrawn and no direct replacement exists for calculating theoretical link capacities. However, the previous guidance indicated that for two-lane single carriageway roads with a 60 mph speed limit, such as the A63 and A162, an hourly flow of approximately 1,590 vehicles per direction could be assumed. Traffic surveys undertaken to inform the Transport Assessment recorded flows of 869 vehicles on the A63 during the weekday morning peak hour (08:00–09:00), and 508 vehicles on the A162 at South Milford during the same period. These observed flows are notably well below the indicative capacity previously recommended in the DMRB guidance. Committed developments will add in the range of 1,500-3,500 daily movements to the A162/A63 depending on location (further detailed in Table 6-6 in the TA). Applying the percentage increases associated with committed developments to the peak hour would still see both roads operating under the capacity outlined in the paragraph above. North Yorkshire Council has identified existing capacity constraints at the A162/A63 roundabout during peak periods and has proposals in place to increase junction capacity. These improvements are expected to be delivered prior to the Proposed Development becoming operational.

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				While consultation feedback indicates that local routes can experience higher levels of traffic during peak periods, the data does not suggest that the highway links are subject to such severe capacity issues that would hinder access. Access will be designed such that emergency services are able to access the site easily with site roads being clearly laid out and signed in accordance. Three separate NYFRS access points to the BESS Compound have been integrated. A swept path analysis for emergency vehicles has been undertaken, and the roads have been confirmed as suitable for emergency vehicle access. The BESS Compound will have a robust and validated Emergency Response Plan, developed in consultation with NYFRS. An ERP will be developed post planning consent to facilitate effective and safe emergency response. It will follow UK National Fire Chiefs Council (NFCC) and NFPA 855 guidelines.
SMPC-36	South Milford Parish Council	Aviation, Glint and Glare	Sherburn-in-Elmet airfield operates as a flying club and flight training school and is located approximately 1.5 miles from Sites 2, 6, 7 and 8 (Monk Fryston, South Milford and Sherburn-in-Elmet). As such, the sites are within the regular approach and departure flightpath for all light aircraft. Risks such as 'glint and glare' can affect visibility during take-off, landing and pattern circuits, particularly on small local airfields with Visual Flight Rules (VFR). As Sherburn has multi-directional runways, solar panels located in any direction from the airfield cause a potential risk. In addition, large open areas of solar panels can create low-level wind turbulence near to light aircraft circuits.	The Applicant acknowledges these comments. As part of the Application, the Applicant submitted a **Glint and Glare Assessment (ES Volume 3, Appendix 16.4) [APP-186]**, where the Applicant considered the impact of the Proposed Development from a glint and glare perspective on the Sherburn-In-Elmet Airfield and Burn Airfield as well as for road, rail and residential properties plus other aviation receptors, and this is discussed further in **ES Volume 1, Chapter 16: Other Environmental Matters [APP-054].** The Glint and Glare Assessment predicted significant impacts from south-facing and tracking panels on aviation activity at Sherburn-in-Elmet and Burn Airfields. However, the **Empirical Study (ES Volume 3, Appendix 16.4: Glint and Glare Assessment [APP-186])** indicates the impacts predicted by the Glint and Glare modelling do not occur in practice. On this basis, the Applicant considers that no mitigation is required, and no significant effects are anticipated for airfield users. The Applicant is continuing to engage with these airfields. The Applicant agrees that ground-mounted solar arrays have the potential to produce low-level wind turbulence through thermal updraughts when solar panels are heated by the Sun; there is however no evidence of this negatively impacting general aviation pilots. Solar panels are designed to absorb energy from the Sun and typically operate most efficiently at around 25°C; they are designed to remain cool in direct sunlight, and it is not anticipated that panels would reach temperatures significantly greater than the surrounding ground. Thermal updraughts from solar PV are expected to be comparable to that already experienced by pilots from natural and manmade heat sinks (such as areas of asphalt/tarmac), which pilots are routinely trained to manage.
SMPC-37	South Milford Parish Council	Ornithology	Solar farms can also attract birds due to the open spaces, water retention features, or foraging opportunities. Increased bird activity near airfields may raise the risk of bird strikes, which is a major safety concern, particularly for light aircraft.	The nearest airfield is located over 10 km from the Bird Mitigation Area and is used only intermittently by light aircraft. At this distance and given the limited scale and low-intensity nature of such operations, there is no credible pathway for risk or disturbance. Furthermore, comprehensive baseline data have been collected across the Site using a range of robust survey methods, including vantage point surveys and both diurnal and nocturnal walkovers. Light aircraft movements therefore form part of the existing baseline conditions. Across all surveys undertaken (including vantage point surveys, nocturnal and diurnal walkover surveys), there have been no recorded instances of disturbance attributable to aircraft activity, nor any evidence of bird strike events.

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				Taken together, this provides strong empirical evidence that the current level of aviation activity does not pose as a risk to bird populations within the Site or vice versa.
SMPC-38	South Milford Parish Council	Ornithology	The Light Valley Solar site is within 3 miles of Fairburn Ings which is an RSPB Nature Reserve, with wetlands that attract a variety of migrating birds.	The Applicant acknowledges these concerns. A detailed desk and field study, including breeding and non-breeding bird surveys, were undertaken in accordance with recognised guidance and are reported in Section 12.6 of **ES Volume 1, Chapter 12: Ornithology [APP-050]** as well as **ES Volume 3, Appendix 12.1: Breeding Bird Survey Report - Solar Development Sites 1-5 [APP-174]**, **Appendix 12.2: Non-breeding Bird Survey Report [AS-029 to AS-031]**, and **Appendix 12.3: Breeding Bird Survey Report - Solar Development Sites 6-8 [AS-032]**. Potential impacts to all relevant bird species have been assessed, and a comprehensive package of embedded and additional mitigation, including habitat retention, enhancement and the Bird Mitigation Area, has been proposed and is secured via the **Outline Landscape and Ecological Management Plan (oLEMP) [APP-195]** and the **Outline Bird Mitigation Area Management Plan (oBMAMP) [APP-205]** to avoid or reduce effects to a non-significant level, but such measures will also be beneficial to all species. Both plans are secured through Requirements in the **Draft Development Consent Order (DCO) [APP-017]**. **ES Chapter 12: Ornithology [APP-050]** has assessed impacts on Fairburn Ings and concludes that no significant adverse effects on the ornithological interest features of Fairburn and Newton Ings SSSI are predicted due to the separation distance between the Proposed Development and Fairburn Ings, however it is also important to note that species that are associated with the SSSI, overlap substantially with those listed under the international designated site (Lower Derwent Valley and Humber Estuary) and therefore they are indirectly captured in the assessment through those sites. See paragraphs 12.11.13 to 12.11.16 in **ES Chapter 12 [APP-050]** for additional details. The Applicant notes that the RSPB has agreed with the approach to the assessment of birds (breeding and non-breeding) and are satisfied with the mitigation and enhancement measures proposed, outlined within **ES Volume 1, Chapter 12: Ornithology [APP-050]** and the **Outline Bird Mitigation Area Management Plan (oBMAMP) [APP-205]**.
SMPC-39	South Milford Parish Council	Construction and decommissioning	Sites 6, 7 and 8 were added to the proposal after the first round of consultation. This was a material change in the development; therefore, there was limited data available in the initial scoping opinion, thereby undermining the integrity of the project's 'Preliminary Environmental Information Report' (PEIR). This is in contravention of the Planning Inspectorate's guidance. As such, members of the local community feel that they were not given sufficient data or the opportunity to comment during the scoping phase. This undermines the principles of transparency and meaningful engagement that underpin the Nationally Significant Infrastructure Project (NSIP) process.	Although Environmental Impact Assessment (EIA) Scoping is recognised as a useful preliminary procedure, it is not a mandatory requirement under the EIA Regulations and is advisory only. The purpose of the EIA scoping process is to get agreement on the methodologies and the scope of assessments that would be taken based on the description of the Proposed Development and not a specific red line boundary. EIA Scoping is also not a public consultation process but a technical consultation on the EIA scope only. The addition of Sites 6-8 did not change the methodology or the scope of what needed to be assessed as it involves the same type of development as the other Solar Development Sites. The addition of these sites only adjusted the study area to be considered.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				Sites 6-8 were included in the Phase 2 Statutory Consultation where members of the local community were able to comment on the proposals. The Applicant considers that the Statutory Consultation has been robust, thorough and undertaken in accordance with the requirements of the Planning Act 2008, the Environmental Impact Assessment (EIA) regulations, and the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. The Applicant's consultation has been considered sufficient by the Planning Inspectorate through its acceptance of the DCO Examination. Furthermore, the Applicant's consultation has been considered sufficient and compliant by North Yorkshire Council through its **Adequacy of Consultation Response [AoC-005]**.
Skipwith Parish Council				
SKPC-01	Skipwith Parish Council	Landscape and visual	Overall Proposed Development is an industrialised Proposed Development inappropriate for this rural area.	The Applicant makes note of this comment. The Applicant acknowledges that the Proposed Development would introduce changes to the character of parts of the landscape and to some views north of Skipwith. It is recognised through NPS EN-1 which states in Section 5.10 that '*virtually all nationally significant energy infrastructure projects will impact the landscape*'". Paragraph 5.10.13 explains further that *"all proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites"*. NPS EN-3 provides further policy on solar photovoltaic generation. In paragraph 2.10.19 it notes that "*utility-scale solar farms are large sites that may have a significant zone of visual influence*." A detailed Landscape and Visual Impact Assessment (LVIA) has been carried out by the Applicant, and this is presented in **ES Volume 1, Chapter 10: Landscape and Visual [APP-048]**. The Applicant acknowledges that the Proposed Development would introduce changes to the character of parts of the landscape and to some views. However, the LVIA concludes that, with embedded and additional mitigation, the resulting effects would be localised, reversible and would reduce over time. It should be noted that with proposed mitigation in place and following initial establishment, landscape and visual impacts will generally reduce over time. Mitigation measures include substantial new planting, reinforcement of existing vegetation, careful siting of infrastructure, and minimisation of lighting to avoid unnecessary urbanising effects. While landscape mitigation takes time to establish, the LVIA demonstrates that by Year 15 of operation, once planting has matured, the majority of landscape and visual effects would reduce and would not be significant. Mitigation measures are shown on the **Outline Environmental Masterplans (OEM) [PDA-003 to PDA-010]** and are secured via the **Works Plans [AS-004]**, **Outline Landscape and Ecological Management Plan (oLEMP) [APP-195]**, and the **Design Parameters and Commitments document [APP-217]**.
SKPC-02	Skipwith Parish Council	Agricultural Land and Soils	Your assessment of the quality of land is deeply flawed. We reject your contention that 80% of land in site 1 is subgrade 3.	The Applicant makes note of this comment. The areas of each Agricultural Land Classification (ALC) grade affected by the Proposed Development are set out in **ES Volume 3, Appendix 5.1: Agricultural Land Classification [APP-150]**. Of the agricultural land within the Solar Development Sites, approximately 402 ha (45%) is confirmed as Subgrade 3b which is a resource of medium sensitivity and not considered BMV land. Approximately 307 ha (34%) is confirmed as Subgrade 3a, while approximately 179.4 ha (20%) is confirmed as Grades 1 and 2. The distribution of ALC

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				grades is shown in **ES Volume 2, Figure 5.2: Agricultural Land Classification [APP-071].** The methodology for assessing agricultural land quality aligns with accepted best practice guidance issued by the Institute of Environmental Management and Assessment (IEMA) (now known as the Institute of Sustainability and Environmental Professionals (ISEP) and the methodology for soil surveys and the assessment have been verified as acceptable in consultation with Natural England.
SKPC-03	Skipwith Parish Council	Transport and access	No proper understanding of impact on Skipwith, in particular the siting of the cabling corridor, enabling work, associated traffic and engineering works and why the construction traffic should pass down Main Street. The village infrastructure should not be torn apart to facilitate extraordinary loads coming through it	**ES Volume 1, Chapter 14: Traffic and Movement [APP-052]**, Table 14-6 notes in response to consultation comments from Skipwith Parish Council that an **Outline Construction Traffic Management Plan (oCTMP) [APP-201]** has been prepared to identify the routes that should be used by construction traffic. An access route, located off Skipwith Road and north of Main Street, has been identified to minimise movements through the village. This route will be used by the majority of construction vehicles. Skipwith Main Street will only be used for movement of Abnormal Loads. Arrangements for transport of the Abnormal Loads will need to be made under licence with the Local Highway Authority to ensure it can be done safely, and to minimise impacts. To accommodate Abnormal Loads, the authorised works on Main Street will be temporary (see Schedule 5 to the **Draft Development Consent Order (DCO) [APP-017]**, 'Alteration of Streets', Part 2 'Temporary Alteration of Layout', and shown on the **Streets Plans [AS-007]**, Sheet 4 of 22). No other works activities are proposed in Skipwith Village.
SKPC-04	Skipwith Parish Council	The Proposed Development and DCO Process	Unrealistic contribution to the grid, based upon other existing solar farms.	The **Statement of Need [APP-214]** sets out the need and justification for the Proposed Development. It describes the Government's policy that large capacities of low carbon generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "*a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar*" (NPS EN-1(2025) Para 3.3.23). As such, the Proposed Development, and other solar projects, are needed. The Proposed Development will generate up to 500MW of clean power, and the Battery Energy Storage System (BESS) which is included as associated development would allow energy generated by the solar panels to be stored such that it could be exported to the grid to contribute to meeting consumer needs during higher demand periods. **ES Volume 1, Chapter 9: Greenhouse Gas Emissions [APP-047]** describes at Paragraph 9.9.31 that the Proposed Development is expected to generate on average 568 GWh per year (when allowing for panel degradation) over the Proposed Development's 60-year operational life. Figure 32 of the **Statement of Need [APP-214]** shows how a combination of low carbon technologies, including wind and solar, is capable of closely matching a future projection of annual national electricity demand on a month-average level.
Riccall Parish Council				
RCPC-01	Riccall Parish Council	Transport and access	[Concern around] The cable crossing over the A19 - access to village, traffic safety etc.	The Applicant notes this comment. **ES Volume 1, Chapter 14: Traffic and Movement [APP-052]** presents the impact assessment undertaken for traffic and details the likely significant effects of the Proposed Development on traffic and movement. The **Transport Assessment (TA) [APP-178]** has been prepared to assess the impact of the Proposed Development on the transport network during construction.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				The Applicant reiterates its commitment to road safety, and notes that with implementation of the final version of the **Outline Construction Traffic Management Plan (oCTMP) [APP-201]**, roads should be no less safe than they currently are. Highway Improvement Areas (HIAs) have been identified where required to support the safe movement of construction traffic. HIAs are sections of the highway network where localised improvements are proposed, such as improvements to the road edge where it is deteriorated and provision of temporary passing places within the existing highways boundary, traffic management, and provision of visibility splays, or temporary highway and traffic works required to safely accommodate the Abnormal Indivisible Load (AIL) deliveries. While these measures will benefit construction traffic, including AILs, they will also enhance road safety and general usability for all road users; for example, the provision of passing places on narrower roads enabling regular and construction traffic to pass each other with ease. Agreement has been reached with NYC on the traffic management proposals for the construction access locations for the Cable Route Corridor crossing the A19. It has been advised, for example, that vehicles approaching the Cable Route Corridor access at Riccall should approach the junction on the A19 from the south, using a roundabout south of the access to approach and left turn into the junction only, thereby preventing the need to cross the A19. This routing is incorporated into **ES Volume 2, Figure 14.4: Construction Routing [APP-113]**. The cable crossing of the A19 would be undertaken using trenchless techniques, such as Horizontal Directional Drilling (HDD). This approach avoids the need for open trenching of the carriageway and therefore would not require road closures or significant disruption to traffic on the A19. Therefore, the temporary increase in traffic during the construction phase is not expected to significantly alter the conditions on the network.
RCPC-02	Riccall Parish Council	Transport and access	[Concern around] The cable run alongside the children's playground - access, road safety, hedgerows and trees.	The construction access routes for the Cable Route Corridor and detailed within **ES Volume 2, Figure 14.4 Construction Routing [APP-113]**. Routes have been designed such that construction traffic does not pass directly adjacent to the playground. As such, no direct interaction between construction traffic and users of the playground is anticipated. The likely significant effects of the Proposed Development during the construction phase are assessed throughout the **Environmental Statement (ES) [APP-038 to APP-190]**, including effects on traffic and transport, noise and vibration, air quality, landscape and visual amenity, ecology, and local communities. As part of the assessment, appropriate mitigation measures have been developed and are incorporated into the Proposed Development. Measures to limit disruption during construction are secured in the **Outline Construction Environmental Management Plan (oCEMP) [APP-192]** and the **Outline Construction Traffic Management Plan (oCTMP) [APP-201]**. The construction of the cable route has been assessed throughout the **ES [APP-038 to APP-190]**, which considers the effects associated with these works. The ES assesses the cable route within defined parameters, including limits on working width and assumed trench dimensions (as identified within **ES Volume 1, Chapter 2: The**

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				Proposed Development [APP-040] and, where relevant, the **Design Parameters and Commitments document [APP-217]**) to ensure that a reasonable worst-case scenario is assessed. The design commitments that have been made are secured within Schedule 2, Requirement 4 of the **Draft Development Consent Order (DCO) [APP-017]**. The detailed design and construction of the cable route will be undertaken within the parameters authorised by the DCO. In relation to hedgerows and trees, works within the Cable Route Corridor have been designed to minimise vegetation removal where practicable, with any necessary clearance limited and managed as part of construction and followed by reinstatement on completion. Measures to manage and minimise construction effects, including reinstatement of land following installation, are set out in the **oCEMP [APP-192]**.
RCPC-03	Riccall Parish Council	Noise and vibration	[Concern around] Noise and access to the construction site	The assessment of construction noise and vibration is undertaken in accordance with the methodologies outlined in Section 11.5 of **ES Volume 1, Chapter 11: Noise and Vibration [APP-049]**. The assessment references British Standard BS 5228:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites - Noise (Part 1) and Vibration (Part 2). Details of the assessment including plant equipment assumptions and predicted construction noise levels are presented in **ES Volume 3, Appendix 11.2: Construction Noise and Vibration Assumptions and Results [APP-172].** The assessment, which includes noise emissions from horizontal directional drilling and piling, concludes that there will be no significant adverse effects from construction noise and vibration, following the application of best practicable measures mitigation approaches. The closest noise sensitive receptor within Riccall is represented by assessment location reference CRC_R2 as illustrated in **ES Volume 2, Figure 11.2: Environmental Sound Survey and Assessment Locations [APP-099]** and as described in Table 11-8 of the **ES Volume 1, Chapter 11: Noise and Vibration [APP-049]**. As presented in Table 2.1 of **ES Volume 3, Appendix 11.2: Construction Noise and Vibration Assumptions and Results [APP-172]**, construction activities during the daytime are not predicted to exceed Category A (adopted noise impact threshold). In line with BS5228, this is an indication of impacts not resulting in a significant effect. As for activities during the night-time, temporal exceedances of the ABC threshold are predicted at CRC_R2 for a relatively short period (1-2 days for the closest HDD site). However, noise levels are not predicted to exceed the threshold for more than 40 days within any six consecutive months, or for a period of ten or more days in any 15 consecutive days. As such the temporal criterion for significance (as defined in BS 5228) is not expected to be triggered. Noise effects from night-time construction activities are therefore assessed as not significant. **ES Volume 1, Chapter 14: Traffic and Movement [APP-052]** includes a host of mitigation measures including the implementation of an **Outline Construction Traffic Management Plan (oCTMP, [APP-201])** to formalise measures mitigating construction-related effects; the provision of suitable access points for construction vehicles; and the provision of appropriate protection or separation between existing Public Rights of Way (PRoW) and construction routes where necessary. Further

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				measures include restricting HGV and Abnormal Indivisible Load (AIL) movements to designated routes, undertaking improvement works where required to facilitate AIL access, and allowing within the Order Limits for the provision of passing places on narrow rural roads to enable the safe movement of construction vehicles. The **oCTMP [APP-201]** has been prepared to identify the routes that should be used by construction traffic. These routes take into account the existing condition of the road and seek, where practicable, to avoid residential areas.
RCPC-04	Riccall Parish Council	Construction and decommissioning	[Concern around] The last minute addition of a construction camp in King Rudding Lane - this is totally unsuitable for construction traffic - it is a single track country lane with passing places leading to Skipwith Common and joins the A19 at a very sharp junction with no traffic splays - we believe there are better alternatives to this available locally - two small industrial areas with open storage both of which could directly access the cable route. - we haven't had a reply over this yet.	The **Transport Assessment (TA) [APP-178]** has been prepared to assess the impact of the Proposed Development on the transport network during construction. Construction traffic routes and access points have been developed to utilise the most appropriate sections of the highway network and, where practicable, to minimise the use of more constrained rural routes. Table 2-1 of the Transport Assessment sets out baseline traffic flows on the assessed links and demonstrates that King Rudding Lane currently accommodates HGV movements, with approximately 7% of total traffic comprising HGVs. Under the assessed worst-case scenario, the construction phase would result in a temporary increase in HGV numbers on this route (from 28 to 56 movements), representing a short-term increase in HGV composition. These changes have been assessed within the TA and are considered to be temporary and limited in scale. They would be managed through the Construction Traffic Management Plan (CTMP), which will include measures such as defined routing, controls on the timing of vehicle movements, and the use of traffic management where required to minimise impacts on the local network. The conclusions of the TA are set out in Section 7 and confirm that any temporary impacts associated with the Proposed Development can be appropriately managed through the final Construction Traffic Management Plan (CTMP), with no long-term significant effects expected on the transport network. Based on the information received it is assumed this concerns the potential use of the A19 Business Park and the industrial estate on Market Weighton Road. The A19 Business Park has been deemed to not be suitable due to its separation distance from the Proposed Development leading to increased vehicle movements between the business park and the Proposed Development which would lead to increased effects on local residents as vehicles would be required to travel down Selby Road. The industrial estate on Market Weighton Road has been deemed to not be suitable due to its separation distance from the Proposed Development leading to increased vehicle movements on the local network. A response to a similar comment was responded to within **Consultation Report Appendix 12: Section 42 Applicant Response Table [APP-037]**.
RCPC-05	Riccall Parish Council	Cumulative and In-Combination Effects Consultation	We are extremely concerned over the cumulative effect of number of solar farms in the area and we will making representations over this, the information sources that we were pointed to in the meeting don't show all of the solar farms and are extremely difficult to read, we	Information regarding cumulative effects can be found in **Environmental Statement (ES) Volume 1, Chapter 17: Cumulative and In-Combination Effects [APP-055]**. Through developing the ES, each topic chapter, where relevant, has included a cumulative impact assessment, considering other committed developments in the area

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
			urgently need a map showing all of the proposed solar farms including those under construction North of the M62 and East of the A1, in particular those in and around Selby and up the A19 corridor - without this it is difficult to visualise the overall impact on the area.	and potential added impacts to aspects such as traffic. The topic-specific conclusions are summarised in each relevant topic chapter of the ES and in Table 17-12 of **ES Volume 1, Chapter 17: Cumulative and In-Combination Effects [APP-055]**. The cumulative assessment has taken into account nearby developments, including other solar projects, that fall within the relevant zones of influence for each topic to evaluate potential combined effects. Many of these developments are located within North Yorkshire, with some in nearby administrative areas due to the proximity of the Proposed Development to other administrative areas. To support the ES the Applicant produced a short list of cumulative Proposed Developments, included in Table 17-11 **ES Volume 1, Chapter 17: Cumulative and In-Combination Effects [APP-055]**, and shown visually on **ES Volume 2, Figure 17.1: Locations of Short List Cumulative Schemes [APP-142]**. Figure 17.1 names ten nearby Nationally Significant Infrastructure Projects within the study area of the cumulative assessment and includes a number of Solar Farms; but also includes the locations of other smaller cumulative developments that also includes a number of solar farms. See Table 17-11 for additional solar farms which can then be cross-checked against the numbering on Figure 17.1 to locate these. A long list of 196 Proposed Developments, is included in Table 2-1 of **ES Volume 3, Appendix 17.1: Long List of Developments to Inform Cumulative Assessment [APP-189]**. The approach to establishing the list of developments to be included in the cumulative assessment is set out in Chapter 17 and aligns with PINS advice.
RCPC-06	Riccall Parish Council	The Proposed Development and DCO Process	We have concerns that once the cable route has been built additional solar farms will be constructed on adjoining land along the cable route to utilise the infrastructure that is being put in place as part of this proposal - particularly as these would be much smaller individual developments and therefore not receive as much scrutiny as Light Valley.	The Cable Route serves the Proposed Development alone and the cables installed are for the purpose of the Light Valley Solar Farm alone. The cable therefore cannot be used for the benefit of other solar developments in the area.
Thorganby Parish Council				
TGPC-01	Thorganby Parish Council	Agricultural Land and Soils	Most of the land which would be affected around the Escrick site (LVS Site 1) is classified as BMV/ALC Grade 2 (the second highest land rating in the UK), and is used for arable production rather than grazing pasture. The removal of this land from productive farming would have a negative impact on UK domestic food production and therefore UK food security – increasing reliance on overseas producers and leading to increased CO2 emissions resulting from transportation of food into the UK via sea and air freight.	The effects of the Proposed Development on agricultural land, including land quality and productivity, are assessed in **ES Volume 1, Chapter 5: Agricultural Land and Soils [APP-043]**, which states that food security has been considered. The Applicant does not consider that food security will be compromised by the Proposed Development (or solar energy more widely), particularly in the context that the 486 ha of BMV land within the Proposed Development (of which/ approximately 19.1 ha would be required for the permanent elements of the Proposed Development involving soil sealing) would represent approximately 1% of the likely BMV land in Selby District and 0.08% of the likely BMV land in the Yorkshire and Humber Region. It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the NPPF. Further, the Government's UK Solar Roadmap (2024) states that solar development is not considered to compromise food security, and that climate change itself poses the greatest long-term risk to food production - a risk which
TGPC-02	Thorganby Parish Council	Agricultural Land and Soils	We are not familiar with the status of other affected areas, but feel that parishes across the development will and should highlight the BMV/ALC values for their	

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
			areas so that the wider impact on food production and the amplified effect on additional imports is made clear. Every thousand tonnes of wheat, potatoes or carrots (widely grown in this area) not produced in the UK must be imported, as we are not a net exporter of any of these foodstuffs.	the Proposed Development directly helps to address by providing a secure, low-carbon source of electricity. As set out in **ES Volume 1, Chapter 3: Alternatives and Design Iteration [APP-041]** and **ES Volume 3, Appendix 3.1: Site Selection Assessment Report (SSAR) [AS-019]**, the northern portion of Site 1 which was recorded as BMV, was removed from use for solar panels in response to landscape, agricultural land and cultural heritage considerations. Government-led agricultural initiatives, such as the Sustainable Farming Incentive which is relaunching later in 2026, have prioritised soil health, environmental enhancement and climate resilience, recognising that long-term food security is influenced by a range of factors beyond land take alone, including soil condition, climate change and environmental pressures. The Proposed Development allows soils to remain in situ and undisturbed during operation, supporting soil recovery and long-term land health, with land reinstated and returned to agricultural use as far as practicable following decommissioning. No permanent loss of agricultural land is anticipated. It should also be noted that the latest figures to September 2024 indicate that solar occupied around 21,200 ha of agricultural land in the UK. In 2025, 545,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England on 1 June 2025). Whilst there is an environmental and economic cost to importing food, and it is recognised the UK imports a far greater amount of food than it exports. It should also be noted that, as set out in the **Outline Decommissioning Environmental Management Plan (oDEMP) [APP-194]**, post-decommissioning of the Proposed Development, the land will be able to be returned to agricultural use. The landowners would choose how the land is to be used and managed, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate.
TGPC-03	Thorganby Parish Council	Socioeconomics, Tourism and Recreation	Whilst landowners may be content to sell up and pocket the proceeds, Parishioners have expressed serious concerns over how many tenant farming families are either going to be made jobless/homeless, or have the acreage they farm reduced below sustainable business levels. Add to this the reduction in work for the many independent and small-scale farming contractors based throughout the region and we foresee a great deal of economic hardship resulting from the significant loss of arable lands under this proposed Proposed Development. These are not careers or skills that are easily transferrable into other areas, so we do not consider that any "employment opportunities" associated with the development would be sufficient to remedy the likely hardships which would be brought about by the Proposed Development.	**ES Volume 1, Chapter 13: Socioeconomics [APP-051]** notes that no job losses are anticipated across the majority of farms within the Order Limits. One farm which has signed an Option Agreement with the Applicant has identified the potential for a single job loss; however, this has been deemed negligible in the context of the wider assessment of the economy and has therefore been scoped out of further consideration. The **EIA Scoping Report (ES Volume 3, Appendix 1.1 [APP-143])** proposed to scope out effects on agricultural holdings and farm businesses because all landowners with farm businesses who are involved in the solar and battery elements of the Proposed Development have agreed to be involved in the project on a voluntary basis and have, therefore, considered the potential effects on the overall viability, diversity and resilience of their farm businesses. Agreements will also be in place between the landowners and occupiers of the land should the Proposed Development proceed. The Applicant has provided evidence to PINS that voluntary agreements are in place and that all existing tenancies in these sites are based on short-term licences only, with no

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				long-term tenancy agreements or succession rights affected by the Proposed Development. The Proposed Development would provide a long-term, alternative income source that would remove reliance on direct public support from agri-environment schemes whilst still providing environmental benefits. It would offer a stable diversification option for agricultural businesses and provide financial security against volatility in wholesale food commodity markets and yields, protecting the remaining farm operations. Alongside this, for contractors there would be ongoing opportunities during the construction phase of the Proposed Development as well as during operation for local workforce to upskill and engage with the employment opportunities offered during the lifecycle of the Proposed Development.
TGPC-04	Thorganby Parish Council	Biodiversity and Ecology	North Yorkshire is predominantly a rural county, and as such is recognised as having a large number of often sensitive and internationally recognised wildlife sanctuaries. Within this immediate area we have both the Lower Derwent Valley National Nature Reserve, a SSSI/Ramsar site of internationally recognised importance for migrating wildfowl, and the Skipwith Common National Nature Reserve.	The Applicant acknowledges these concerns. Potential impacts of the Proposed Development on ecology and biodiversity are assessed in **ES Volume 1, Chapter 6: Biodiversity [APP-044]** and **Chapter 12: Ornithology [APP-050]**, which considers baseline conditions and evaluates likely effects during construction, operation and decommissioning. The assessment identifies embedded and additional mitigation measures and concludes that, with these measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated. A detailed desk and field study, including breeding and non-breeding bird surveys, were undertaken in accordance with recognised guidance and are reported in Section 12.6 of **ES Volume 1, Chapter 12: Ornithology [APP-050] as well as ES Volume 3, Appendix 12.1: Breeding Bird Survey Report - Solar Development Sites 1-5 [APP-174], Appendix 12.2: Non-breeding Bird Survey Report [AS-029 to AS-031], and Appendix 12.3: Breeding Bird Survey Report - Solar Development Sites 6-8 [AS-032].** For avoidance of doubt, the Lower Derwent Valley SAC, SPA, Ramsar and SSSI, Skipwith Common SAC and SSSI were scoped in at scoping phase and have been carried through the Assessment. This site has been considered and assessed in the **ES Volume 1, Chapter 6: Biodiversity [APP-044], Chapter 12: Ornithology [APP-050]** and **sHRA [APP-223].** The sHRA found no credible impact pathways to Skipwith Common SAC. With regards to the Lower Derwent Valley, potential impacts to all waterbird species have been assessed using a precautionary approach, and a comprehensive package of embedded and additional mitigation, including habitat retention, enhancement and the Bird Mitigation Area, has been proposed and is secured via the **Outline Landscape and Ecological Management Plan (oLEMP) [APP-195]** and the **Outline Bird Mitigation Area Management Plan (oBMAMP) [APP-205]** to avoid or reduce effects to a non-significant level, but such measures will also be beneficial to all species. Both plans will be secured through **Requirements the Draft Development Consent Order (DCO) [APP-017]**. The Applicant notes that the RSPB has expressed broad support for the approach to assessment of birds (breeding and non-breeding) and is satisfied with the mitigation and enhancement measures proposed, outlined within **ES Volume 1, Chapter 12:**

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				Ornithology [APP-050] and Outline Bird Mitigation Area Management Plan (oBMAMP) [APP-205].
TGPC-05	Thorganby Parish Council	Ornithology	The Lower Derwent Valley NNR has been recognised by the UK Government as a Special Protection Area and a Ramsar site - Ramsar Sites are wetlands of international importance designated under the Convention on Wetlands. The area sees tens of thousands of migrating birds visiting each year, and there is a great danger of massive solar arrays causing disturbance to migratory flightpaths, creating "false lake" effects and thereby causing death, injury and displacement amongst the birdlife normally seen in the area – totally contrary to the safeguards put in place to establish the protected status of the area.	The Applicant acknowledges the respondent's concerns and has robustly considered the relevant internationally designated sites, including the Lower Derwent Valley (although noted as an NNR too), as well as the more distant Humber Estuary SPA and Ramsar sites. However, the concept of the "lake effect" is largely derived from studies undertaken in the United States (US), typically in relation to large-scale solar developments in expansive desert environments. These conditions are not directly comparable to the UK, which is characterised by a greater vegetated landscape and a greater abundance of natural and man-made waterbodies. It is also important to note that there is no evidence to suggest that solar arrays create displacement for birds in flight, as species are able to readily pass over such infrastructure (and larger than that within the Proposed Development) without implications as these are migratory birds which travel significant distances.
TGPC-06	Thorganby Parish Council	Biodiversity and Ecology	In respect of Skipwith Common NNR - Skipwith Common is one of the last remaining areas of northern lowland heath in England. An incredible variety of plants and animals depend on the Common for their survival. The 270ha of open heath, ponds and mire is an ancient landscape, with its roots in pre-history. Skipwith Common's heathland has stayed almost the same for thousands of years – with its physical geography closely linked to the surrounding area and likely to suffer if watercourses and drainage around the site are disturbed.	Potential impacts of the Proposed Development on ecology and biodiversity are assessed in **ES Volume 1, Chapter 6: Biodiversity [APP-044]**. An assessment of the potential impacts on the qualifying features of the Skipwith Common SAC and SSSI as a result of the Proposed Development is included in the ES chapter and the **Shadow Habitat Regulations Assessment (sHRA) [APP-223]**. The sHRA concludes no pathway for adverse effects to be caused to Skipwith Common SAC, and **ES Volume 1, Chapter 6: Biodiversity [APP-044]** confirms that negligible effects on Skipwith Common SAC and SSSI are anticipated during construction, which are not significant. Skipwith Common SSSI was also considered from an ornithological point, whereby a detailed assessment was undertaken during the PEIR stage and concluded that there would be no significant effects to ornithological reasons for notification, which Natural England also supported. Details of this are provided in 12.11.19 of the ES Chapter 12. Natural England have accepted in their relevant representation that there will be no water impacts to Skipwith Common.
TGPC-07	Thorganby Parish Council	Transport and access	During the lengthy construction phase of such a large-scale proposal, there is inevitably going to be a massive increase of HGV traffic onto narrow, often poorly surfaced country roads. One consequence of this is going to be a rapid degradation of already challenging roads, making driving more hazardous and damage to vehicles far more likely as HGVs break up road edges and create more potholes.	**ES Volume 1, Chapter 14: Traffic and Movement [APP-052]** includes a host of mitigation measures including the implementation of an **Outline Construction Traffic Management Plan (oCTMP, [APP-201])** to formalise measures mitigating construction-related effects. This includes a requirement for a road condition survey to be carried out prior to commencement of construction. The survey scope, including the routes to be surveyed, would be agreed with NYC prior to a road condition survey being undertaken. On completion of construction activities, a follow-up survey will be undertaken. If any issues are identified, that can be attributed to the construction activities for the Proposed Development, these issues will be resolved by the Principal Contractor to the satisfaction of NYC. Private access tracks used for construction access will be maintained and returned to a condition no worse than before.
TGPC-08	Thorganby Parish Council	Transport and access	There are already times when commuting traffic makes the rural road network congested, and residents having to share narrow road space with large vehicles is only going to exacerbate this problem – and over a very lengthy period of time.	**ES Volume 1, Chapter 14: Traffic and Movement [APP-052]** includes a host of mitigation measures including the implementation of an **Outline Construction Traffic Management Plan (oCTMP, [APP-201])** to formalise measures mitigating construction-related effects; the provision of suitable access points for construction vehicles. The oCTMP includes controls to avoid construction traffic travelling during peak periods on the network. Deliveries will typically be scheduled between 09:30 and

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				16:30, thereby avoiding the morning and evening peak hours of 08:00–09:00 and 17:00–18:00, and construction worker travel will also be managed to occur outside of these peak periods. The provision of appropriate protection or separation between existing Public Rights of Way (PRoW) and construction routes where necessary is covered within the **Outline Public Rights of Way Management Plan (oPROWMP) [APP-199]**. Further measures include restricting HGV and Abnormal Indivisible Load (AIL) movements to designated routes, undertaking improvement works where required to facilitate AIL access, and allowing within the Order Limits for the provision of passing places on narrow rural roads to enable the safe movement of construction vehicles. Where needed, these passing places would be located away from residential properties. Temporary Traffic Management (TTM) measures would also be implemented where required.
TGPC-09	Thorganby Parish Council	Transport and access	At certain times of the farming year, especially around harvest, the rural road network also sees a huge increase in farming traffic and large vehicles such as combined harvesters, and whilst residents of these areas are used to this and make allowances for sharing the road with contractors moving from farm to farm and between fields, to add a large amount of additional construction HGV traffic is likely to bring some areas to a standstill.	The **Transport Assessment (TA) [APP-178]** adopts a robust assessment approach based on a reasonable worst case scenario, with forecast traffic flows and construction activity levels ensuring that potential impacts are not underestimated. While recognising that rural roads can experience periodic increases in traffic, such as during agricultural activity, these variations are accounted for within the conservative assessment assumptions. Each link has been assessed based on the total forecast traffic associated with the relevant solar development site, representing a robust worst case scenario. In practice, construction traffic would be distributed across multiple access routes to each site, resulting in lower traffic levels on any individual link than those assessed. Section 5 of the TA provides further detail on Trip Generation. **ES Volume 1, Chapter 14: Traffic and Movement [APP-052]** includes a host of mitigation measures including the already mentioned implementation of an **Outline Construction Traffic Management Plan (oCTMP, [APP-201])** to formalise measures mitigating construction-related effects; the provision of suitable access points for construction vehicles; timing of construction vehicle movements to avoid peak hours. The provision of appropriate protection or separation between existing Public Rights of Way (PRoW) and construction routes where necessary is covered within the **Outline Public Rights of Way Management Plan (oPROWMP) [APP-199]**. Further measures include restricting HGV and Abnormal Indivisible Load (AIL) movements to designated routes, undertaking improvement works where required to facilitate AIL access, and allowing within the Order Limits for the provision of passing places on narrow rural roads to enable the safe movement of construction vehicles.Temporary Traffic Management (TTM) measures would also be implemented where required. The conclusions of the TA are set out in full in Section 7; overall, the TA concludes that any temporary impacts from the Proposed Development can be managed through the final Construction Traffic Management Plan (CTMP), and there is not expected to be any long-term significant impacts on the transport network.
TGPC-10	Thorganby Parish Council	Transport and access	The proposed road and junction changes planned to accommodate heavy vehicles and exceptionally large vehicles are going to entail loss of hedgerows and	The Proposed Development has been designed to avoid loss of woodland and hedgerow wherever practicable (as set out by the areas for physical infrastructure shown on the **Works Plans [AS-004]** and removal is largely only required to facilitate access points / cable routing / fencing, with reinstatement provided where feasible.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
			mature trees, with subsequent impact both on wildlife and the nature of the countryside around the sites.	Access tracks and cable routing will be sought to be located to pass through existing field gates and gaps in hedgerows, as set out in the **Outline Construction Environmental Management Plan (oCEMP) [APP-192]** and **Outline Landscape and Ecological Management Plan [APP-195]**. Overall, based on worst case assumptions, 4.08 km of hedgerow and treeline will require removal to facilitate the Proposed Development. To mitigate for this loss, 37.14 km of hedgerow are proposed within the Order Limits.
TGPC-11	Thorganby Parish Council	Socioeconomics, Tourism and Recreation	There is going to be a loss of amenity in terms of footpaths, bridleways and other rights of way currently enjoyed over varying types of countryside being subsumed into an industrial landscape offering no enjoyable recreational facilities in comparison with that available to residents and visitors at present.	Access to existing routes (with localised diversions implemented where necessary) will be maintained throughout the construction phase, with three permanent diversions planned, as secured through the **Outline Public Rights of Way Management Plan (oPROWMP, [APP-199]).** The Applicant has embedded mitigation measures to maintain the amenity of Public Rights of Way, including the provision of landscaping and a minimum 15 metre buffer offset from all infrastructure, including fencing; these measures are set out in **ES Volume 1, Chapter 13: Socioeconomics [APP-051]**. In addition, measures have been identified to minimise disruption and manage temporary diversions during construction, ensuring pedestrian access is maintained wherever possible and that safe, clearly signposted alternatives are implemented where necessary. These are set out in the **oPROWMP [APP-199]** submitted as part of the Application. The provision of approximately 8 km (5 miles) of new permissive paths (as shown on the **Outline Environmental Masterplans (OEM) [PDA-003 to PDA-010]**) will ensure that access to nature and the countryside for both visitors and the local community is maintained and enhanced.
TGPC-12	Thorganby Parish Council	Biodiversity and Ecology	Loss of habitat for mammals, birds and insect life is going to devalue the flora and fauna of the area in a manner which is unlikely ever to be improved in a dramatically changed landscape, regardless of ancillary planting Proposed Developments which are unlikely to mature for decades and, given the proposed 60-year lifespan of this development, we foresee a desertification effect of the ground under the solar arrays and those areas affected by associated infrastructure and cabling routes.	Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 6: Biodiversity [APP-044]** and **ES Volume 1, Chapter 12: Ornithology [APP-050]**. The Applicant has followed a robust environmentally led design process taking account of the mitigation hierarchy. This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the Proposed Development. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. The Applicant has incorporated a variety of mitigation and enhancement measures into the design of the Proposed Development; these include: • Fencing of the Solar Development Areas within the Solar Development Sites will be designed to let small mammals pass through, the layout of the fencing specifically designed to retain commuting corridors around existing linear features (ditches and hedgerows) through the Proposed Development that will be free of obstacles for animals. • The provision of a Bird Mitigation Area at the south of Site 1. • The woodland and hedgerow network within the Solar Development Sites will be strengthened through the creation of new areas of habitat, increasing habitat connectivity. • Buffer zones around watercourses will comprise grassland habitat and will be managed sympathetically for ecology where possible.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				• The final cable route will be microsited within the Cable Route Corridor to best avoid impacts on important ecological features and fauna as identified during the UK Habitat surveys and species surveys where possible. • The appointment of an Ecological Clerk of Works (ECoW) at the start of construction works, who will provide ecological supervision during any ecologically sensitive works. • Landscape planting will be provided within green corridors, and within larger areas of habitat creation within the Proposed Development, to provide habitat managed sympathetically for ecology, and to provide the net gain in biodiversity. These measures are further detailed in and secured via the **Outline Landscape and Ecological Management Plan [APP-195]**, **Outline Construction Environmental Management Plan (oCEMP) [APP-192], Outline Operational Environmental Management Plan (oOEMP) [APP-193], Outline Decommissioning Environmental Management Plan (oDEMP) [APP-194]** and the **Design Parameters and Commitments document [APP-217]** The Proposed Development will also result in the cessation of intensive arable farming within the Solar Development Sites. As identified in **ES Volume 1, Chapter 6: Biodiversity [APP-044],** this is expected to reduce the ongoing use of chemical fertiliser and pesticides, supporting improvements in habitat quality over the operational lifetime of the Proposed Development. The conversion of existing cropland within the Solar Development Sites to predominantly grassland habitats can be expected to benefit a wide range protected and notable species, as identified in **ES Volume 1, Chapter 6: Biodiversity [APP-044]**. It is expected that the Proposed Development will have a gain of approximately 70% Habitat BNG, including 78.58% for habitats, 73% for hedgerows, and 10.42% for watercourses, based on the current proposals. Full details are set out in the **Biodiversity Net Gain (BNG) Report [APP-220].** The Defra Statutory BNG Metric has been used to demonstrate net gain. The proposals are also supported by the **Outline Landscape and Ecological Management Plan [APP-195]**.
TGPC-13	Thorganby Parish Council	The Proposed Development and DCO Process	There is, it would seem, little to recommend in terms of turning an area from a green, pleasant and rural landscape into a mono-culture of extremely large solar panels, and there is no way of disguising the fact that this is going to make the area less appealing and therefore the properties owned and invested in by many families are likely to be both harder to sell and will achieve lower sale prices than if the development was not prevalent in the area. What compensation is the developer going to offer to those affected and what mechanism will exist to fairly value properties?	The Applicant notes this comment. The Applicant has submitted the **Book of Reference [APP-022]**. This includes persons who may be eligible to claim compensation if the Development Consent Order is granted and the Proposed Development developed. Under Part 1 of the Land Compensation Act 1973, property owners (Category 3) are eligible to claim compensation for any physical impacts from the operation of the Proposed Development, such as noise and vibration. However, compensation is not available for loss of value due to visual impacts or diminished views—this is consistent with established planning law. The Applicant will comply with statutory process for any compensation claims submitted and will review and assess each claim in accordance with the relevant legislation under which it is made.
TGPC-14	Thorganby Parish Council	Community benefit	Retail energy markets are largely governed by wholesale gas prices, which is mainly imported, and therefore we feel that this proposed Proposed Development would deliver zero benefit in terms of	The Applicant is committed to providing a Community Benefit Fund to allow for community driven benefits that are not necessarily associated with the Proposed Development itself as the Applicant agrees that the communities closest to the project should benefit from it.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
			cost savings to the residents whose locale is being so dramatically altered. The energy produced under such a Proposed Development would be fed into the National Grid and retailed according to market forces, and therefore this area simply becomes a "factory floor" for energy production and transitions from being a rural economy to an industrial economy – with no mandate for such change from those most affected.	As a low cost form of energy generation connected to the electricity transmission network, it will contribute to lowering the cost of energy for all including those locally.
TGPC-15	Thorganby Parish Council	Cumulative and In-Combination Effects	We have seen outline plans for other planned sites to the east of Thorganby, meaning that this area is set to be surrounded by such developments and many more communities to the east of the River Derwent are likely to be negatively affected as these developments join together. Regionally, this becomes a far larger impact than the 2500 acres covered by the LVS proposal, and should be recognised as a "bigger picture".	Information regarding cumulative effects can be found in **ES Volume 1, Chapter 17: Cumulative and In-Combination Effects [APP-055].** In addition, through developing the ES, each topic chapter, where relevant, has included a cumulative impact assessment, considering other committed developments in the area (including those east of Thorganby) and potential added impacts to aspects such as traffic. While summaries of the cumulative assessments undertaken for each topic are included in the topic's **ES chapter [APP-038 to APP-056], ES Volume 1, Chapter 17: Cumulative and In-Combination Effects [APP-055]** Table 17-12 provides the broader overall conclusions regarding cumulative and in-combination effects for **ES Chapters 5 to 15 [APP-043 to APP-053]**.
TGPC-16	Thorganby Parish Council	Site selection	We have seen no explanation as to why the many brownfield sites left in the wake of industrial shrinkage over the past 50 years are not being considered. In addition, as a result of the geographical location of this area near to a North-South/East-West crossroads of the A1/M1 and M62, there have been many massive scale warehousing and distribution centre developments with huge buildings with roofs suitable for solar power placements. Is it simply that going onto greenfield sites is cheaper and faster than the more complex exploitation of industrial and brownfield sites?	Site selection is addressed in **ES Volume 1, Chapter 3: Alternatives and Design Iteration [APP-041]** and **ES Volume 3, Appendix 3.1: Site Selection Assessment Report (SSAR) [AS-019].** The SSAR explains how brownfield land, industrial land, previously developed land, and low-grade agricultural land were considered through the site selection process. As set out in **ES Volume 3, Appendix 3.1: Site Selection Assessment Report (SSAR) [AS-019]** the Applicant reviewed available brownfield land within 25km of the POC at Monk Fryston Substation. The assessment concluded that there were no sites within the search area of sufficient size to accommodate a large-scale solar development, either individually or cumulatively. The sites assessed were too small to support the Proposed Development and were largely allocated for housing or mixed-use development, in line with local planning policies, thereby creating a conflict with the intended use for renewable energy infrastructure. Therefore, it was concluded that there was no available or suitable brownfield land for the purposes of the Proposed Development. National policy and government guidance, as set out in the **Statement of Need [APP-214]**, recognise that while rooftop and smaller-scale solar installations are an important part of the energy mix, they cannot alone meet the scale of capacity required to achieve clean power and net zero objectives. Large-scale ground-mounted solar therefore remains necessary in addition to, not instead of, rooftop solar. Rooftop Proposed Developments cannot deliver the necessary scale, even when combined.
TGPC-17	Thorganby Parish Council	The Proposed Development and DCO Process	This is not a Proposed Development which benefits residents, the UK taxpayer or the UK Treasury This Proposed Development, to the best of our knowledge, is backed by an international asset management company based in Australia. The profits	The Applicant, Light Valley Solar Limited, is a 100% subsidiary of IGP UK Projects Limited. Both are registered in England and Wales and subject to UK tax law and regulations. Investment may come from a range of sources, including international ones. This is common practice with UK infrastructure projects and helps fund the transition to clean energy at the scale required.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
			derived from running this Proposed Development are intended to flow to the shareholders of this organisation and, as shareholders demand accountability in relation to maximising their income from investments, the organisation behind the Proposed Development will have one simple motivation - to extract the maximum amount of revenue throughout the course of the Proposed Development in order to satisfy shareholder demand. The rights and negative consequences to the residents affected, and indeed the wider UK, simply will not feature in the operational planning of such a proposal. The Proposed Development may be dressed up as "green and environmentally positive" but big business does not operate on such a premise - it looks for profit opportunities. There is nothing wrong with this, per se, as this is the remit of the business, but asking residents of this area to put up with all the negative consequences of such a development "in the interests of the UK, green energy and global benefits" is disingenuous. This is about making money – potentially to the huge detriment of the residents and regions affected by it for generations.	The Applicant notes the concerns about the reasons behind the Proposed Development. The Applicant's **Statement of Need [APP-214]** provides evidence that the Proposed Development aims to help meet national targets for clean energy and net zero targets set out in legislation and policy. The aim is to deliver long term environmental benefit alongside a secure energy supply. The Applicant is committed to meeting all planning, environmental, and construction policies and standards committed to in the DCO and the submitted management plans. The Proposed Development is being developed in line with legal and regulatory requirements, with engagement with all relevant statutory and non-statutory bodies, ensuring quality and accountability throughout. These commitments are made in the context that a breach of them would be a criminal offence. The Applicant acknowledges that any adverse effects from the Proposed Development are more likely to be felt locally than the largely wider-scale benefits of the Proposed Development. The Proposed Development is anticipated to help meet the UK's net zero requirements for energy production, which is considered a critical national priority and set out in National Policy Statements for Energy NPS EN-1 (Section 4.2) and EN-3. This therefore will benefit the national population rather than just the local population. Where the Proposed Development is anticipated to benefit local people more specifically, this is done through providing onsite permissive paths to increase access to the countryside, providing improved landscape planting through reinforcing existing hedgerows and planting of new trees and providing biodiversity net gains through habitat improvements. These are set out in detail with the **Planning Statement [APP-207]**. It is also noted that the Proposed Development would be required to pay a substantial business rate contribution to North Yorkshire Council, retained and spent by them. That notwithstanding, the Applicant is committed to providing a Community Benefit Fund to allow for community-driven benefits that are not necessarily associated with the Proposed Development itself. The purpose is to establish a means to recognise local community needs that the Applicant wants to be able to contribute towards in recognition of the local impact of the Proposed Development. However, the Applicant recognises that this Fund should not be taken into account in the planning balance for the Proposed Development.
TGPC-18	Thorganby Parish Council	The Proposed Development and DCO Process	There is no mention of a compensation Proposed Development for loss of livelihoods, reductions in property values or loss of amenity – let alone the generational damage to the countryside and its wildlife – this is a Proposed Development which takes without giving, and as such we cannot endorse and will continue to oppose it.	The Applicant has submitted the **Book of Reference [APP-022].** This includes persons who may be eligible to claim compensation if the Development Consent Order is granted and the Proposed Development developed. Under Part 1 of the Land Compensation Act 1973, property owners (Category 3) are eligible to claim compensation for any physical impacts from the operation of the Proposed Development, such as noise and vibration. However, compensation is not available for loss of value due to visual impacts or diminished views—this is consistent with established planning law. The Applicant will comply with statutory process for any compensation claims

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				submitted and will review and assess each claim in accordance with the relevant legislation under which it is made.

4 The Applicant's responses to notable bodies and non-statutory organisations

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
Yorkshire Wildlife Trust				
YWT-01	Yorkshire Wildlife Trust	Biodiversity and Ecology	YWT have welcomed the engagement with the Applicant's design team at an early stage in the design process, to gain a mutual understanding of the technical constraints and the impacts upon the environment. During meetings regarding the Preliminary Environmental Information Report (PEIR) we welcomed the commitment to including adequate buffer zones to riparian zones and woodland parcels, including ancient woodland due to the presence of these habitats across the order limits.	This comment is acknowledged by the Applicant.
YWT-02	Yorkshire Wildlife Trust	Biodiversity and Ecology	We also acknowledge adequate buffer zones included in the Proposed Development design, due to the known presence of badger setts throughout the site.	The Applicant notes this comment.
YWT-03	Yorkshire Wildlife Trust	Arboriculture	We also welcome the commitment to avoiding removing any trees in the proposed cable route, however we would be grateful to be contacted regarding this matter if tree loss is anticipated and advise of compensatory measures.	The Applicant notes this comment and will continue to engage with YWT if tree loss is anticipated.
YWT-04	Yorkshire Wildlife Trust	Biodiversity and Ecology	Whilst we were pleased to note the following areas of conservation importance were scoped out of the order limits: "This notably includes the Skipwith Common SAC, SSSI, NNR and Lower Derwent Valley SPA, SAC, SSSI, NNR in the northeast of the search area, together with a number of SSSIs within the search area." (Site selection assessment: 06.03.03.01 ES Volume 3, Appendix 3.1 Site Selection Assessment Report) Due to the scale of the project, the land within the order limits is considered to be functionally linked to these areas. The Lower Derwent Valley (LDV) is designated as a Special Area of Conservation (SAC) for its lowland hay meadows amongst other features.	Whilst these areas have been excluded from the Order Limits, an assessment of the potential impacts on the qualifying features of the SAC, Ramsar and underlying SSSIs as a result of the Proposed Development is included in **ES Volume 1, Chapter 6: Biodiversity [APP-044]** and the **Shadow Habitat Regulations Assessment (sHRA) [APP-223].** The Lower Derwent Valley SAC is designated for Annex I habitats: Lowland hay meadows (Alopecurus pratensis, Sanguisorba officinalis) and Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) as well as Annex II species otter. As further discussed in the **Shadow Habitat Regulations Assessment (sHRA) [APP-223]**, the Proposed Development is not functionally linked to the Lower Derwent Vally **SAC** (however is functionally linked to SPA). The Applicant notes the presence of Functionally Linked Land to the SPA in both **ES Volume 1, Chapter 12: Ornithology [APP-044]** and **Shadow Habitat Regulations Assessment (sHRA) [APP-223]** that Functionally Land associated with bird species has been fully and appropriately assessed within the **Shadow Habitat Regulations Assessment (sHRA) [APP-223]**, which specifically assesses the Lower Derwent Valley and Humber Estuary SPA and Ramsar. It is also important to note that species located outside of the Order Limits were included in the overall assessment, including feral species, which has informed the design of the Bird Mitigation Area. Natural England is satisfied with the approach, assessment and conclusion.
YWT-05	Yorkshire Wildlife Trust	Biodiversity and Ecology	The North Yorkshire Local Nature Recovery Strategy (NY LNRS) states: "Lowland heathland is a rare habitat in England, and the	The Order Limits do not comprise any lowland heath and there will be no direct loss of lowland heath as a result of the Proposed Development.

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			York and Selby areas contain 2% of the country's resource, supporting rare species such as Pillwort, Slender Pond Snail, Adder and Nightjar." And: "The Lower Derwent Valley, south east of York, supports one of the best examples of traditionally managed species-rich floodplain meadow habitat in the UK and supports internationally important populations of wintering waterfowl," (Pg. 6: North Yorkshire and York Local Nature Recovery Strategy (LNRS)) In order to best restore these important areas, the LNRS states the aims are to: "Undertake creation/restoration of lowland heath utilising seed rich brash, green hay and other material from appropriate local donor sites, and ongoing sensitive management." (Pg. 46: North Yorkshire and York Local Nature Recovery Strategy (LNRS) Given the importance of landscape scale restoration in order to achieve nature's recovery in Yorkshire, it is crucial that important features are not further fragmented. Due to the extents of the order limits of Light Valley Solar (LVS), covering land functionally linked to the LDV, we are concerned that the proposal could hamper these efforts should it be approved. Therefore, we would expect to see that the mitigation design within the Applicant's supporting documentation is reflective of the aims of the LNRS. Here it is also prudent to note that YWT work extensively across the LDV catchment to help ensure nature's recovery so we are particularly interested in ensuring that any proposed mitigation is reflective of these aims.	The Lower Derwent Valley SAC is designated for Annex I habitats: Lowland hay meadows (Alopecurus pratensis, Sanguisorba officinalis) and Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) as well as Annex II species otter. As further discussed in the **Shadow Habitat Regulations Assessment (sHRA) [APP-223]**, the Proposed Development is not functionally linked to the Lower Derwent Vally **SAC** (however is functionally linked to SPA). Consulting the LNRS mapped measures layer, there are only very discrete areas where mapped measures overlap the Solar Development Sites, and none of which comprise measures advising the creation of lowland heathland. As such, the landscape proposals largely reflect the aims of the LNRS within the Solar Development Sites. The LNRS mapped measures for heathland (Restore degraded lowland heathland sites and re-create this habitat at suitable locations) does however overlap the Cable Route Corridor for approximately 670 m near Skipwith Common SAC**.** There will be no long-term ownership of the Cable Route Corridor, which will be passed back to the current landowners after the temporary works are completed. As such, the Applicant is not able to create habitat or restore degraded habitat within the Cable Route Corridor. The works within the Cable Route Corridor will however be minor and temporary. The baseline habitats will largely be reinstated after the works are completed within the Cable Route Corridor and as such, fragmentation of habitats will be no greater then at baseline within the Cable Route Corridor. The provision of various commuting corridors within the Solar Development Sites, and the proposals of grassland beneath the panels, will also maintain connectivity through the Solar Development Sites. The Applicant would welcome discussion with YWT over potential inclusion of lowland health within the Solar Development Sites to assist with the prevalence of the habitat within the region.
YWT-06	Yorkshire Wildlife Trust	Biodiversity and Ecology	We note the PEIR stating the following intention: "A significant positive effect is expected for arable field margins as a result of the creation of grassland habitat in place of cropland beneath the solar panels." (Pg.22, Chapter 6: Biodiversity,, PEIR, 2025) There is little reference to restoration of lowland heath throughout the embedded mitigation measures described in the PEIR, nor reference to lowland fen, another priority habitat currently present within the order limits. We would be keen to continue discussions with the Applicant to discuss how the proposed mitigation can be tailored to the area to ensure these priority habitats can flourish.	Within the Order Limits, there is no lowland heath habitat. The only area of lowland fen is located within the Cable Route Corridor, where Ouse Bank-Westfield-Riccall Ings SINC intersects with the Cable Route Corridor. This SINC will be crossed using HDD, so the lowland fen present will not be impacted by the Proposed development. The Applicant would welcome discussion with YWT over potential inclusion of lowland health and lowland fen within the Solar Development Sites to assist with the prevalence of the habitat within the region. There will be no long-term ownership of the Cable Route Corridor, which will be passed back to the current landowners after the temporary works are completed. As such, the Applicant is not able to create habitat or restore degraded habitat within the Cable Route Corridor; however, the baseline habitats will largely be reinstated.
YWT-07	Yorkshire Wildlife Trust	Biodiversity and Ecology	Where the potential for damage to retained habitats is mentioned, the following is stated: "Potential for damage to retained habitats should be	As discussed in the **Shadow Habitat Regulations Assessment (sHRA) [APP-223]**, the Proposed Development is not considered functionally linked to the Lower Derwent Vally SAC or Skipwith Common SAC as no habitats listed as part

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			avoided by following the Design Principles set out in Chapter 2 (and repeated below in the Embedded Mitigation in Section 6.8) which will be provided in the oCEMP/oLEMP" (Pg 12. Chapter 6: Biodiversity, PEIR, 2025) We are keen to discuss the detail included with the Outline Construction Environmental Management Plan (oCEMP) and review how habitat restoration and creation within the order limits will support the nature recovery efforts outlines in the LNRS. As we have stated, areas within the order limits are considered to be functionally linked to the LDV and other important areas of nature conservation such as Skipwith Common SSSI, SAC, NNR; as a result of the proximity of these sites of conservation importance to the order limits, habitat creation that creates stepping stones throughout the landscape would be favourable.	of the designations for these designated sites are present within the Order Limits (i.e. lowland heaths, Lowland hay meadows, and Alluvial forests). Consulting the LNRS mapped measures layer, there are only very discrete areas where mapped measures overlap the Solar Development Sites, and none of which comprise measures advising the creation of lowland heathland. There is a small area within site 7 (0.4 ha) listed in mapped measures as *"Enhance, expand and connect areas of fragmentary fen by improving management of existing sites and using species-rich ditches to connect sites."* However the habitat covered by this measure comprises cropland surrounded by railway lines and further cropland, so it is not possible to satisfy this aim for lowland fen in this location. As such, the landscape proposals largely reflect the aims of the LNRS within the **Solar Development Sites**. The LNRS mapped measures for heathland (Restore degraded lowland heathland sites and re-create this habitat at suitable locations) does however overlap the **Cable Route Corridor** for approximately 670 m near Skipwith Common SAC. There will be no long-term ownership of the Cable Route Corridor, which will be passed back to the current landowners after the temporary works are completed. As such, the Applicant is not able to create habitat or restore degraded habitat within the Cable Route Corridor; however, the baseline habitats will largely be reinstated. The provision of various commuting corridors within the Solar Development Sites, and the proposals of grassland beneath the panels, will also maintain connectivity through the Solar Development Sites. The Applicant would welcome discussion with YWT regarding nature recovery within the Solar Development Sites and discussion over detail included in the **oCEMP [APP-192]**.
YWT-08	Yorkshire Wildlife Trust	Biodiversity and Ecology	We were pleased to see the Applicant has committed to producing an Outline Landscape Management Plan (oLEMP): "Areas within buffer zones and undeveloped parts of the Solar Development Sites will undergo targeted habitat creation and enhancement and will be managed in line with an Outline Landscape Management Plan (oLEMP)." (Pg. 41, Chapter 6: Biodiversity, PEIR, 2025) Indicating how proposed habitat creation, mitigation methods and compensation Proposed Development design, will be managed over the lifetime of the solar farm. However, despite the welcome commitment for the duration of the operational lifetime, we have concerns over the longevity of habitat creation proposed. Our planning team's concerns over decommissioning are consistent across all solar projects we comment on as a non-statutory consultee.	The Applicant has a leasehold interest in the land for the Solar Development Sites. At the end of the Proposed Development's operational life, all Solar PV Sites would be decommissioned and the land restored to its original use and condition as far as practicable. There will be opportunities for the retention of a range of biodiversity improvements, including established habitats, hedgerows and woodland, beyond the decommissioning of the Proposed Development, ultimately enhancing the ecological value of the area. Measures to manage decommissioning and reinstatement are set out in the **Outline Decommissioning Environmental Management Plan (oDEMP) [APP-194]** which has been submitted as part of the DCO Application. A detailed Decommissioning Environmental Management Plan will be prepared substantially in accordance with the **Outline Decommissioning Environmental Management Plan (oDEMP) [APP-194]** and must be submitted to and approved by the relevant local planning authority prior to the commencement of decommissioning. This is secured through Requirement 19 in Schedule 2 of the **Draft Development Consent Order (DCO) [APP-017]**.
YWT-09	Yorkshire Wildlife Trust	Construction and decommissioning	Solar farms are treated as temporary developments, with operational lifetimes generally of 30–40 years. In the case	The Applicant notes this comment.

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			of LVS, it is interesting to note the lifetime is expected to be 60 years. If, upon decommissioning, these sites revert back to arable land, any contribution to nature recovery is potentially lost. The Applicant has stated that due to the nature of the development, ownership will return to the original landowner after decommissioning, when the lease is completed; whilst we acknowledge that this is out of the Applicant's control, we would be keen to discuss what legal agreements could be put in place to protect areas of habitat creation in perpetuity.	As stated in **ES Volume 1, Chapter 2: The Proposed Development [APP-040]**, as well as in Section 2 of the **Outline Decommissioning Environmental Management Plan (oDEMP) [APP-194]** which is secured under Schedule 2, Requirement 19 of the **Draft Development Consent Order (DCO) [APP-017]**, all land will be returned to its original use and condition as far as practicable and returned to the landowner. The expectation is that the land will return to farming, but the Applicant cannot dictate what will happen to the land post-decommissioning when the Applicant no longer has an interest in the land. However, any proposal taken forward by a landowner after decommissioning would be seen in the context that the lawful use, post-solar, would be the land use that is currently taking place on that land.
YWT-10	Yorkshire Wildlife Trust	Biodiversity and Ecology	In contrast, habitats within a Local Nature Recovery Strategic network are far more likely to be retained beyond the 30 years of a BNG agreement, creating the legacy for nature recovery aspired to in BNG's founding principles. Regarding BNG, the strategy has not been finalised, and we are aware that due to the scale of the Proposed Development, we would expect to see the Applicant offering more than the 10% that is soon to be mandatory for NSIPs. Whilst we were pleased to hear that the Applicant is keen not to overestimate what uplifts can be realistically achieved, especially beneath the solar array, we would also like to discuss the potential of diversifying the habitat creation where possible.	The BNG calculation completed using the current proposed plans was submitted with the application, as detailed in the **Biodiversity Net Gain (BNG) Report [APP-220]**. This concluded that the Proposed Development would provide approximately 70% gain in habitats and hedgerows and over 10% gain in watercourse units, which goes above the requirement for NSIPs. The Applicant would be happy to discuss the possibilities surrounding the diversification of habitats.
YWT-11	Yorkshire Wildlife Trust	Biodiversity and Ecology	We welcomed continued engagement with the Ecology team regarding the design of the cable route. We were informed that targeted surveys for water vole in locations where the cable route will be crossing watercourses, were ongoing while the design was being finalised. We were pleased to see these surveys were undertaken and the results included with the submission documents. As we understand, the Applicant is working with Natural England (NE) to obtain the relevant water vole mitigation licences in the single location where water vole presence has been confirmed along the Cable Route Corridor, which is welcome.	The Applicant notes this comment. Following discussions with Natural England, they have confirmed that a Letter of No Impediment is required. An Outline Water Vole Mitigation Strategy will be provided no later than Deadline 1 to Natural England which would accompany a CL31 water vole class licence, and be used to underpin a the LONI. The Applicant will keep the ExA updated on progress in securing the LoNI from Natural England.
YWT-12	Yorkshire Wildlife Trust	Ornithology	The ornithological consultant in conversation with YWT confirmed that North Yorkshire Council had agreed a monthly ornithological survey programme with them, which we supported however we have not been able to view the results of these surveys to date. The Applicant had committed to this in the PIER, due to an incomplete baseline there was a requirement for additional mitigation which they stated would be further assessed at ES stage. YWT had wished to comment on the proposals, particularly in relation to proximity to statutory and non-statutory protected wildlife sites such as SACs, SPAs and	An email was issued to YWT on 15 April 2026 providing a link to the full suite of application documents, alongside an invitation to attend a follow-up meeting to discuss the findings. YWT subsequently advised that there were difficulties in accessing and reviewing the reports and requested a copy of the non-breeding bird report, which was promptly provided. The Applicant also notes that a number of the comments raised appear to relate to the PEIR, rather than the submitted Environmental Statement, which contains the complete ornithological baseline and full survey results. The Applicant has since discussed these comments with the YWT. For avoidance of doubt, the results of the ornithological surveys are reported in/

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			Ramsar sites (and any land functionally linked to these sites), SSSIs and Local Wildlife Sites.	Section 12.6 of **ES Volume 1, Chapter 12: Ornithology [APP-050]** as well as **ES Volume 3, Appendix 12.1: Breeding Bird Survey Report - Solar Development Sites 1-5 [APP-174]**, **Appendix 12.2: Non-breeding Bird Survey Report [AS-029 to AS-031]**, and **Appendix 12.3: Breeding Bird Survey Report - Solar Development Sites 6-8 [AS-032]**. The Applicant is continuing to engage with YWT on the Proposed Development and thanks them for their engagement since the submission.
YWT-13	Yorkshire Wildlife Trust	Water Resources and Flood Risk	As stated in the NY LNRS: "The Lower Derwent Valley, south east of York, supports one of the best examples of traditionally managed species-rich floodplain meadow habitat in the UK and supports internationally important populations of wintering waterfowl," (pg. 19: : North Yorkshire and York Local Nature Recovery Strategy (LNRS) Therefore, we would have expected more robust results published at this stage.	An assessment of the likely significant effects on the Lower Derwent Valley as a result of the Proposed Development is presented in the **Shadow Habitat Regulations Assessment (sHRA) [APP-223]** and **ES Volume 1, Chapter 6: Biodiversity [APP-044]** and **Chapter 12: Ornithology [APP-050]**. Whereby designated species associated with the floodplain has been fully assessed in relation to functionally linked land- the species associated with this habitat are also not limited just to those that are listed as features and goes beyond that by including all wetland birds, including feral species (greylag goose). Natural England is satisfied with the level of the precautionary approach undertaken by the Applicant and agrees that the non-breeding bird species have been comfortably mitigated within the Bird Mitigation Area located within the Solar Development Site 1. All ecological and ornithological surveys conducted to inform the sHRA and ES were undertaken following best practice guidance. In addition, the assessment process followed within the sHRA and ES chapters follows relevant legislation. As such, the results published are sufficiently robust and in accordance with relevant legislation and best practice guidance.
YWT-14	Yorkshire Wildlife Trust	Ornithology	Within the Applicant's Non-Breeding Birds Report it is stated that: "In the absence of specific bird surveys guidance for solar farm developments, two types of non-breeding bird surveys were carried out to determine the usage of the Survey Area in accordance with Annex C [guidance]." (Pg. 1, Appendix 12.2: Non-Breeding Birds Report, PEIR, June 2025) Whilst both Vantage Point and walkover surveys were carried out by the Applicant, Natural England's Annex C guidance recommends that "two years of wintering and passage surveys should be completed in certain cases to provide a more robust understanding of SPA bird usage on the site and inform design of suitable mitigation". Considering the large scale and potential ecological impacts of these proposals, YWT are disappointed to see that the Applicant has only completed one year's worth of non-breeding bird survey effort. During meetings regarding the PEIR we welcomed the Applicant's ecological consultants explaining that the conducted field surveys had been complemented by extensive desk study review of ecological records for the area, with the	The Applicant appreciates YWT's engagement throughout the process, from PEIR through to submission. While it is acknowledged that YWT has expressed disappointment with the use of a single year of ornithological baseline survey data, the Applicant would like to reassure YWT that close liaison was maintained with Natural England throughout as discussed since the ES and sHRA were submitted. In doing so, a precautionary approach was adopted that goes beyond what is typically considered standard practice when a two-year approach is used. Further to this, there are comparable developments with larger and more regular counts of bird species (waterbirds) which have not offered mitigation of this size. Inter annual variability is acknowledged throughout the documents and the examples provided within the **Shadow Habitat Regulations Assessment (sHRA) [APP-223]** using other comparable solar NSIP sites evidence that numbers can fluctuate significantly, both up and down per annum.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
			resulting reduced field-survey effort being approved by Natural England. Whilst YWT understand the decisions behind the completed non-breeding bird survey methodology, we believe that two years' worth of field survey effort would represent a more robust survey effort with respect to the current proposals.	
YWT-15	Yorkshire Wildlife Trust	Ornithology	Upon review of Chapter 12 (Ornithology) of the Applicant's PEIR and following discussions with the Applicant's ecological consultants, YWT have requested to be sent the raw survey data from the four completed breeding bird surveys which were carried out to inform the results of this PEIR chapter. Of particular interest are the confirmed/probable ground nesting bird species detailed within Table 12-12 (Pg. 37, Chapter 12: Ornithology, PEIR, June 2025) for Site 4. As of 22nd April 2026, the Applicant's ecological consultants have confirmed they will provide the above data for review by YWT, which is welcomed.	The Applicant has confirmed to YWT that this raw data will be supplied as per the meeting on 03/06/2026 and appreciates YWTs engagement to date. The Applicant and YWT will continue to engage regarding this matter.
YWT-16	Yorkshire Wildlife Trust	Biodiversity and Ecology	In summary, we have been pleased with the engagement from the Applicant's ecological consultants and are satisfied with many of the design features that have been put in place to protect biodiversity across the order limits. These include adequate buffer zones and limiting tree loss insofar as practical. However, as featured in the Biodiversity Chapter of the PEIR, The National Planning Policy Framework (NPPF) states: "Paragraph 192 states that in order to protect and enhance biodiversity and geodiversity, plans should: a) "Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation" With this national guidance in mind, we are keen to continue discussions with the Applicant regarding their proposed mitigation works to ensure that the biodiversity enhancements shown are site specific and contribute to the nature recovery objectives in the region, which extend past the order limits. YWT have concerns that the LDV is being subject to impacts from nationally significant renewable energy development from both flanks. Therefore, the need for targeted mitigation work is essential; especially when considered in relation to the Derwent's proximity to the River Ouse, given the importance of the landscape scale habitat connectivity for migrating bird populations, breeding waders and wildfowl.	The Applicant notes this comment. Under requirement 6 of Schedule 2 to the **Draft Development Consent Order (DCO) [APP-017]** a detailed Landscape and Ecological Management Plan (LEMP) will be prepared that will include further details on the ecological enhancements and planting including seed mixes. The Applicant will continue to engage with YWT on these matters to inform the detailed LEMP.

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			In addition to the mitigation and compensation design for bird species, including ground nesting and waterfowl; we would be keen for discussions to cover the seed mixes proposed to enhance grassland areas and priority habitats such as lowland heath and fen.	
South Milford Community Allotments				
SMCA-01	South Milford Community Allotments	Transport and access	Access is via a single-track lane with national speed limit, dykes on both sides, and pinch points including two railway bridges. The route is used by pedestrians, including older and vulnerable users. Additional construction and operational traffic will increase risk of vehicle–pedestrian conflict.	The Applicant notes this concern. The **Transport Assessment (TA) [APP-178]** has been prepared to assess the impact of the Proposed Development on the transport network during construction. Routes for construction traffic have been chosen to avoid and minimise the impact on settlements where practicable. The Environmental Statement includes an assessment of fear and intimidation in **ES Volume 1, Chapter 14: Traffic and Movement [APP-052]**. This calculates a degree of hazard score, which takes into account the average two-way flow, the HGV composition and the vehicle speed. Table 14-30 and Table 14-31 show that Common Lane, South Milford is subject to a 'Small' level of fear and intimidation in both the baseline (existing) and 'with construction' scenarios. Therefore, the temporary increase in traffic during the construction phase is not expected to significantly alter the levels fear and intimidation. The Applicant reiterates its commitment to road safety, and notes that with implementation of the final version of the **Outline Construction Traffic Management Plan (oCTMP) [APP-201]**, roads should be no less safe than they currently are. Construction activities affecting pedestrian routes would be temporary and managed through the implementation of the CTMP. Measures may include temporary diversions, signage, and traffic management to maintain safety for users. Construction traffic will also be controlled through routing strategies and timing restrictions, reducing interaction with pedestrians where practicable. On this basis, any impacts on pedestrian connectivity would be temporary and appropriately mitigated.
SMCA-02	South Milford Community Allotments	Transport and access	Policy Context: EN-1 (transport safety), EN-3 (community impacts), NPPF (highway safety). A detailed, site-specific Highway Safety Assessment is required, addressing vulnerable users and mitigation measures.	As outlined in the above response, the Environmental Statement includes an assessment of fear and intimidation in **ES Volume 1, Chapter 14: Traffic and Movement [APP-052]**, concluding that any impacts on pedestrian connectivity would be temporary and appropriately mitigated.
SMCA-03	South Milford Community Allotments	Landscape and visual	The allotments lie to the north and east of Site 7, with panels wrapping along the southern and western boundaries. Panels are up to 4.5m high Panels to the south reduce midday sunlight; panels to the west reduce afternoon sunlight, creating cumulative shading across key growing periods.	The Applicant acknowledges this comment. The height of the panels is set out and secured through the **Design Parameters and Commitments document [APP-217].** Whilst this includes a maximum height of 4.5m, the final heights will be subject to the detailed design and choice of panels, therefore may be lower than this height. The solar panels are set back a minimum 12m from the Order Limits and in addition there is also a watercourse and hedgerow and vegetation further separating the panelled area from the allotments in places. Given this distance separation there are no sunlight or shadowing impacts anticipated for the allotments.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
SMCA-04	South Milford Community Allotments	Landscape and visual	Extent of Shadowing Shadow lengths may reach 20–30m in winter and 10–20m in spring/autumn. Combined positioning results in sequential loss of sunlight from midday through evening. This reduces photosynthesis, soil temperature, and crop productivity. Policy Context: EN-1 requires impacts to be avoided or minimised; NPPF protects existing amenity.	The Applicant acknowledges this comment. Guidance on the assessment of overshadowing, produced by the Building Research Establishment, suggests that significant overshadowing is possible where obstructions subtend an angle of 25° from the observer, which is typically approximated by considering an assessment area of three times the obstruction's height. As the solar panels will be no more than 4.5m tall, the relevant assessment area under Building Research Establishment (BRE) Report, 'Site layout planning for daylight and sunlight: a guide to good practice' (BR209) would be 13.5m. The allotments lie outside of this area and will therefore not experience significant overshadowing; shadows would only be possible for a short duration in the evening when the sun is low in the sky. As set out above, the distance separation between the panels and the allotments is sufficient to mitigate any potential shadowing effects on the allotments. In addition, the perimeter fencing will be deer wire mesh and wooden posts allowing sunlight to pass through. Therefore the Proposed Development is consistent with EN-1 in terms of minimising/avoiding impacts. No significant impacts are anticipated in terms of shadowing and therefore amenity value of the allotments.
SMCA-05	South Milford Community Allotments	Landscape and visual	No detailed, site-specific shadow assessment has been provided. A formal sunlight/overshadowing study is required. Policy Context: EIA Regulations 2017 require proper assessment of likely significant effects.	The Applicant acknowledges this comment. As set out above, no significant shadowing effects are anticipated on the allotments and mitigation is embedded in the design through distance separation and boundary treatments. The Building Research Establishment (BRE) Report, 'Site layout planning for daylight and sunlight: a guide to good practice' (BR209) is the leading authority on assessments of shadowing and sunlight. From amenity areas such as outdoor parks, playgrounds or in this instance, allotments, the Report provides that at least half of the site area should receive at least 2 hours of sunlight on the equinox. This test would be met for the allotments.
SMCA-06	South Milford Community Allotments	Human health	The allotments are an important community resource. Reduced sunlight and increased traffic risk will diminish amenity and wellbeing. Policy Context: NPPF promotes healthy communities; EN-1 considers quality of life impacts.	With regard to health, including mental health and wellbeing, the LVS EIA Scoping Report (November 2024) considered the potential effects of the Proposed Development on population health. This considered the likely impacts of the project on the social, economic and environmental determinants of health and the location and sensitivity of the resident population and community receptors. As described in the **Scoping Report [APP-143]**, no potentially significant effects on population health were identified and human health was scoped out of the **Environmental Statement (ES) [APP-038 to APP-190]**. This conclusion was supported by the Planning Inspectorate (PINS) in their **Scoping Opinion [APP-144]**. The Applicant has sought to reduce effects to health through active and focused community engagement throughout the application process; and through development of a suite of management plans which include measures to reduce effects, including a construction traffic management plan. It is not anticipated that any reduction in sunlight would occur on areas of the

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				allotments and there is not considered to be a significant increased traffic risk - see responses above.
SMCA-07	South Milford Community Allotments	Landscape and visual	[Request for] Appropriate buffer distances, and Layout changes to mitigate impacts Solar panels should not be sited within 50m of any boundary/footpath in order not to cause significant harm	The Applicant has embedded a layered mitigation strategy to maintain the amenity of PRoW network and the wider landscape, which goes beyond reliance on stand-off distances alone. This includes a minimum 15 metre offset from infrastructure, including fencing and minimum 30 metre offsets from residential curtilage, as set out in the **Design Approach Document (DAD) [APP-216]**. These offsets are proposed in combination with other mitigation measures, including the retention and reinforcement of existing vegetation, substantial new native planting, careful siting and orientation of infrastructure, and minimisation of lighting to avoid urbanising effects. Together, these measures provide a more effective and responsive approach to reducing visual effects, ensuring that the Proposed Development is integrated with existing landscape structure. As set out in **ES Volume 1, Chapter 10: Landscape and Visual [APP-048]**, the LVIA confirms that, while mitigation takes time to establish, the majority of landscape and visual effects reduce to minor or non-significant levels as planting matures. The mitigation proposals are illustrated on the **Outline Environmental Masterplans (OEM) [PDA-003 to PDA-010]** and secured through the **Works Plans [AS-004]** and **Outline Landscape and Ecological Management Plan (oLEMP) [APP-195]**.
Ramblers				
RMB-01	Ramblers	Socioeconomics, Tourism and Recreation	Our interest is to ensure the Public Rights of Way network in the area of the work is enhanced	The Applicant makes note of this comment. The Proposed Development incorporates the creation of permissive paths to enhance the active travel network in this area. See Section 4.2 of the **Outline Public Rights of Way Management Plan (oPROWMP) [APP-199]** for further details on these. Three permanent PRoW diversions are proposed as part of the Proposed Development and these proposals are outlined in Table 3-3 and Figure 3 Public Rights of Way and Permissive Paths Enhancements and Diversions (Annex A.3) of the **oPROWMP [APP-199]**.
Open Spaces Society				
OSS-01	Open Spaces Society	Socioeconomics, Tourism and Recreation	The Open Spaces Society (the society) is concerned to see that p6,7 and 8 of the plans (Document Reference: EN0110012/APP/LVS/02.02 February 2026) indicates an intention to cut across registered Town or Village Green where: 'Temporary use of land and in relation to which it is proposed to temporarily suspend easements, servitudes and other private right'.	As noted in the **Planning Statement [APP-207]** in the context of open spaces, three Village Greens will be affected to accommodate construction access to the Cable Route Corridor. Given the limited extent of village green land required, which are primarily small areas adjacent to the highway, and the temporary nature of the works, the resulting potential impact is assessed as minor adverse and not significant. Similar temporary impacts may occur during the operational stage of the Proposed Development, should maintenance require larger vehicular access. However, as with the construction phase, these effects would be short-term, with no permanent loss of Village Green land or its availability for community use. Accordingly, these effects are also considered to be not significant. The total area of special category land affected by the Proposed Development is 2,198 square metres. The Applicant is seeking rights only over the relevant plots to undertake temporary 'street widening' works, enabling HGVs and Abnormal Indivisible Load (AIL) vehicles to overrun and oversail existing road edges. As

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				described in the **Statement of Reasons [APP-020]**, these works are expected to comprise temporary measures, such as compacted gravel and plating, rather than permanent materials such as concrete or asphalt, with the land reinstated to its previous condition following the completion of construction. All areas of Village Green affected by the Proposed Development will be reinstated to their existing standard, as far as reasonably practicable, unless otherwise agreed with North Yorkshire Council. This commitment is secured through both the **Outline Construction Environmental Management Plan (oCEMP) [APP-192]** and the **Outline Operational Environmental Management Plan (oOEMP) [APP-193]**.
OSS-02	Open Spaces Society	Socioeconomics, Tourism and Recreation	While we recognise that this solar energy development is being strategically planned, we have only just become aware of this proposal which seeks to use land registered as Town and Village Green - the society was not consulted in earlier phases. Town or village greens are subject to rights for lawful sports and pastimes by local inhabitants and those rights are protected by statute. It is unlawful to commit any act which: 'encroaches on, or encloses, a town or village green or a recreation ground allotted by an enclosure award, or erects anything on, or disturbs or interferes with that green or ground otherwise than for its better enjoyment for its proper purpose.'	The Applicant acknowledges the concerns raised by the Open Spaces Society regarding the statutory protection afforded to the Town and Village Greens and the associated rights for lawful sports and pastimes. The Applicant has had regard to the relevant provisions of the Planning Act 2008, specifically Sections 131 and 132 of the Act, which provide for Special Parliamentary Procedure (SPP) to apply in certain circumstances. This includes where a DCO authorises the compulsory acquisition of land or of rights over special category land. In particular, the test in Section 132(3) is considered to be satisfied, given the land, when subject to the rights sought, will be no less advantageous to those with rights over it and to the public, as the majority of the Town and Village Green will remain unaffected and available for use, with continued public access across the affected areas. The Applicant notes that the areas of Town and Village Green affected are on the edge of the Town and Village Green adjacent to the highway, and would be predominantly used for people to pass and repass from the highway into the wider Town and Village Green. As such, their change from grass to a compacted material appropriate for an HGV will not change that usage, or ability to still be considered as an 'open' space.
OSS-03	Open Spaces Society	Socioeconomics, Tourism and Recreation	In planning renewable-energy developments, individual and cumulative impacts on landscapes and public access should carry substantial weight; every effort should be made to minimise the impact on people's ability to enjoy access to green space, which is important for health and well-being. We urge a rethink on the use of this land as part of this solar project and recommend seeking an alternative siting for the works envisaged at these locations.	As described in paragraph 10.2.6 of the **Statement of Reasons [APP-020]**, the Applicant considers that it will not be necessary for the protections in Sections 131 and 132 to apply in respect of any of the land identified as special category land because the test in Section 132(3) of the Act is satisfied as follows: The special category land comprises only narrow areas of land which effectively form highway verges along the perimeter of the town and village greens. When burdened with the compulsory acquisition rights sought, the land will be no less advantageous to the persons whom it is vested, to those entitled to rights of common or other rights, and to the public. The remainder of the town and village green will remain fully available for use with the public still able to pass and repass across the special category land and thus use it how it is currently used. Accordingly, Section 132(3) of the Planning Act 2008 is satisfied, and replacement land is not required, and it therefore follows that it should not be necessary for the draft DCO to be subject to Special Parliamentary Procedure.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
OSS-04	Open Spaces Society	Socioeconomics, Tourism and Recreation	As a last resort, if the proposals for Light Valley Solar are approved S.16 of the Commons Act 2006 requires that an application to deregister town or village greens before any works take place. Suitable replacement land must be offered and we recommend this is done prior to works starting on site.	In relation to the comment about Section 16 of the Commons Act 2006, the Applicant would draw attention to paragraph 10.2.7 of the **Statement of Reasons [APP-020]** which notes that Section 139 of the Planning Act 2008 is not considered to be relevant to the Proposed Development. Although town and village greens are considered by Section 19 of the Acquisition of Land Act 1981 to be a 'common'; they do not form 'common land' or 'registered rights of common' for the purposes of the Commons Act 2006 and thus there is not a need to consider an interaction with the restrictions in the Commons Act 2006. Instead, the Applicant has carefully considered what restrictions relate to carrying out works on town and village green land and as a result of that assessment, the Applicant has included provisions within the draft DCO to disapply the specific legislation that would otherwise restrict such works. In any case, given the temporary nature of the works, deregistration of the town and village green is not necessary, and therefore no replacement land is required.
The Friends of Skipwith Common FOSC				
FOSC-01	The Friends of Skipwith Common FOSC	Cumulative and In-Combination Effects	Concerned about the cumulative effect of this project and similar solar generation and battery storage Proposed Developments in the vale of York in changing agricultural habitats.	A cumulative effects assessment was undertaken as part of the agricultural assessment in **ES Volume 1, Chapter 17: Cumulative and In-Combination Effects [APP-055]**. This looked at the cumulative effects between the Proposed Development and other proposed and committed plans and projects. This concluded that cumulatively there would be a <u>temporary</u> loss of approximately 2,324 ha of BMV agricultural land; which would represent 2.6% of the BMV land in Selby, which would be locally significant, and 0.2% of the BMV land in the Yorkshire and Humber region, which would not be significant at that scale.
FOSC-02	The Friends of Skipwith Common FOSC	Biodiversity and Ecology	The wider area around the National Nature Reserve of Skipwith Common is integral to the maintenance of the biodiversity currently present on the site.	Potential impacts of the Proposed Development on ecology and biodiversity are assessed in **ES Volume 1, Chapter 6: Biodiversity [APP-044]**. An assessment of the potential impacts on the qualifying features of the Skipwith Common SAC and SSSI as a result of the Proposed Development is included in the ES chapter and the **Shadow Habitat Regulations Assessment (sHRA) [APP-223]**. The sHRA finds no pathway for adverse effects to be caused to Skipwith Common SAC, and **ES Volume 1, Chapter 6: Biodiversity [APP-044]** confirms that negligible effects on Skipwith Common SAC and SSSI are anticipated during construction, which are not significant.
FOSC-03	The Friends of Skipwith Common FOSC	Biodiversity and Ecology	The effect on deer populations has not been studied and the effects on the wide area under consideration are unknown.	Impact of the Proposed Development on protected and notable species and habitats is fully considered in **ES Volume 1, Chapter 6: Biodiversity [APP-044]**. The majority of important habitats will be retained and protected, any arable land will be replaced with grassland which is of higher ecological importance. The chapter concludes that, with embedded mitigation in place, no significant adverse effects on ecological features are anticipated. Similar to all UK wildlife, deer are protected from intentional ill harm and mistreatment. However, legislation surrounding deer is mostly centred around controls over poaching and culling, i.e. times of year, methods used etc. This is due to the impacts of deer overpopulation on the ecosystem and people, i.e. crops, forests and road traffic accidents. As such, excluding intentional ill harm, there is no real legislative consideration for the development with regards to deer.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				Commuting routes through the site of use to deer, e.g. ditches, hedgerows and their surrounding buffers, have been included throughout the Proposed Development and fencing has been designed to work around these commuting routes to ensure the habitat is not fragmented. A CEMP will also be in place which will ensure wildlife will be considered during the construction phase of the Proposed Development and methods utilised to avoid harm. This is secured via the **Outline Landscape and Ecological Management Plan (oLEMP) [APP-195].**
Rooftops Not Countryside				
RNC-01	Rooftops Not Countryside	The Proposed Development and DCO Process	Under Section 104 of the Planning Act 2008, the Examining Authority must consider: National Policy Statements The Development Plan (Selby Core Strategy 2013) Emerging Local Plan Other relevant matters The Core Strategy is clear that: > "The overall aim is to improve the quality of life for all residents" (para 2.1) This proposal fails that fundamental objective.	The Applicant notes concerns regarding the policy compliance of the Proposed Development, particularly the Proposed Development's alignment with the overarching vision of the Selby Core Strategy 2013 to improve quality of life for residents. The Core Strategy should be read in conjunction with the wider policy framework, which supports sustainable infrastructure and recognises the need to balance localised effects against significant national and regional benefits. This is outlined further in the **Planning Statement [APP-207]** and **Policy Compliance Document [APP-224].** Of particular relevance are Section 6: Legislative and Policy Context and Section 7: Planning Assessment, of the Planning Statement which set out an appraisal of the Proposed Development against national and local planning policies. The overarching National Policy Statement for Energy (NPS EN-1) emphasises the importance of avoiding, minimising and mitigating adverse impacts, including those affecting residential amenity and quality of life, while recognising that some adverse effects may remain where this is outweighed by the substantial need for nationally significant energy infrastructure. In this context, the Proposed Development has been subject to detailed environmental assessment, and embedded design measures and mitigation have been incorporated to avoid or minimise effects on local receptors. The findings of these assessments, as reported in the **Environmental Statement (ES) [APP-038 to APP-190]**, demonstrate that residual effects on quality of life are appropriately mitigated and are not unacceptable.
RNC-02	Rooftops Not Countryside	The Proposed Development and DCO Process	Fundamental Issue – This is not sustainable development Policy SP1 (Sustainable Development) requires development to: > "improve the economic, social and environmental conditions in the area" This Proposed Development fails on all three fronts.	The Applicant notes concerns regarding the policy compliance of the Proposed Development, particularly the Proposed Development's alignment with the Policy Sp1 of the Core Strategy. The Core Strategy should be read in conjunction with the wider policy framework, which supports sustainable infrastructure and recognises the need to balance localised effects against significant national and regional benefits. This is outlined further in the **Planning Statement [APP-207]** and **Policy Compliance Document [APP-224]**. Of particular relevance are Section 6: Legislative and Policy Context and Section 7: Planning Assessment, of the Planning Statement which demonstrates how sustainable development has been achieved through the outcomes of the environmental impact assessment, through good design and delivery of economic benefits.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				The Proposed Development has been subject to detailed environmental assessment on the economic, environmental and social effects. Embedded design measures and mitigation have been incorporated. The findings of these assessments, as reported in the **Environmental Statement (ES) [APP-038 to APP-190],** demonstrate that residual effects on quality of life are appropriately mitigated and are not unacceptable. As a renewable energy project, the Proposed Development will make a substantial contribution to the country in achieving net-zero carbon emissions. This is in line with the Clean Power 2030 Action Plan (December 2024). It is therefore considered that the Proposed Development is compliant with local and national policy, including Policy SP1 of the Core Strategy 2013.
RNC-03	Rooftops Not Countryside	Agricultural Land and Soils	Loss of Best and Most Versatile agricultural land [and] Loss of productive farmland	An assessment of the potential effects of the Proposed Development on soils and agricultural land is provided in **ES Volume 1, Chapter 5: Agricultural Land and Soils [APP-043]**. This chapter considers baseline agricultural land quality, including Best and Most Versatile (BMV) land, and assesses likely significant effects arising from construction, operation and decommissioning of the Proposed Development, together with embedded mitigation measures. The areas of each Agricultural Land Classification (ALC) grade affected by the Proposed Development are set out in **ES Volume 3, Appendix 5.1: Agricultural Land Classification [APP-150]**. Of the agricultural land within the Solar Development Sites, approximately 402 ha (45%) is confirmed as Subgrade 3b which is a resource of medium sensitivity and not considered BMV land. Approximately 307 ha (34%) is confirmed as Subgrade 3a, while approximately 179.4 ha (20%) is confirmed as Grades 1 and 2. The distribution of ALC grades is shown in **ES Volume 2, Figure 5.2: Agricultural Land Classification [APP-071]**. The 486 ha of BMV land within the Proposed Development (of which approximately 19.1 ha would be required for the permanent elements of the Proposed Development involving soil sealing) would represent approximately 1% of the likely BMV land in Selby District and 0.08% of the likely BMV land in the Yorkshire and Humber Region. With regard to loss of productive farmland, it should be noted that the latest figures to September 2024 indicate that solar occupied around 21,200 ha of agricultural land in the UK. In 2025, 545,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England on 1 June 2025).
RNC-04	Rooftops Not Countryside	Landscape and visual	Industrialisation of approximately 1,270 hectares	The Applicant notes this comment. As per the description set out in **ES Volume 1, Chapter 2: The Proposed Development [APP-040],** the 'Solar Development Sites' comprise approximately 900 ha of land. Around 680 ha of this land is proposed as being required for installation of solar PV panels and associated infrastructure. The remaining 220 ha would provide areas dedicated to ecological mitigation, measurable Biodiversity Net Gain (BNG) delivery, landscaping, offsets and agricultural land managed for environmental enhancement and habitat creation.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				While the introduction of solar infrastructure would alter the character of parts of the Site, the embedded mitigation ensures that effects would be localised and would reduce over time as planting establishes, rather than constituting permanent industrialisation of the land.
RNC-05	Rooftops Not Countryside	Landscape and visual	The existing environment includes: Open agricultural land Wildlife (deer, badgers, geese, cranes, owls, bats) Access to: > Footpaths > Bridleways These are not minor benefits, they define the community. The proposal would: Replace nature with: Security fencing CCTV Electrical infrastructure Turn rural walks into corridors through a power station	The Applicant acknowledges concerns regarding the change to the rural character of the area, including impacts to wildlife, openness, and the experience of users of Public Rights of Way (PRoW). The Applicant has prepared a **Design Approach Document (DAD) [APP-216]** which explains how the design principles developed for the Proposed Development have influenced the design of the Proposed Development and been a key consideration in design decisions by the Applicant. The design of the Proposed Development has been environmentally led, and gives due weight to the intrinsic character and beauty of the surrounding countryside. This includes the retention of existing landscape features where practicable, the creation of new habitats, and wider biodiversity enhancement, as detailed in the **DAD [APP-216]** and illustrated on the **Outline Environmental Masterplans (OEM) [PDA-003 to PDA-010]**. The **DAD [APP-216]** and **ES Volume 1, Chapter 3: Alternatives and Design Iteration [APP-041]** also explains how the mitigation hierarchy has been a key consideration from the outset of the Proposed Development design, and that various changes have been made to the Proposed Development including removal of a portion of Site 1 to provide a Bird Mitigation Area, the removal of some southern areas of Site 4 and the whole of Site 5 to mitigate against flood impacts, and the creation of new habitats and new biodiversity enhancements. With regard to public access, the Applicant has embedded mitigation measures to maintain the amenity of PRoW, including the provision of landscaping and a minimum 15 metre buffer offset from all infrastructure, including fencing; these measures are set out in **ES Volume 1, Chapter 13: Socioeconomics [APP-051]** as well as the provision of new permissive paths. With mitigation, views of the Proposed Development from PRoW will be filtered. In addition, measures have been identified to minimise disruption and manage temporary diversions during construction, ensuring pedestrian access is maintained wherever possible and that safe, clearly signposted alternatives are implemented where necessary. These are set out in the **Outline Public Rights of Way Management Plan (oPROWMP) [APP-199]** submitted as part of the Application. Overall, the design of the Proposed Development seeks to balance the introduction of necessary infrastructure with the retention and enhancement of landscape character and recreational amenity.
RNC-06	Rooftops Not Countryside	Agricultural Land and Soils	Failure to prioritise brownfield land The proposal does not demonstrate why brownfield sites have not been used first, contrary to: National planning direction Labour Government policy Even partial use of brownfield land could significantly reduce harm.	Site selection is addressed in **ES Volume 1, Chapter 3: Alternatives and Design Iteration [APP-041]** and **ES Volume 3, Appendix 3.1: Site Selection Assessment Report (SSAR) [AS-019]**. The SSAR explains how brownfield land, industrial land, previously developed land, and low-grade agricultural land were considered through the site selection process. As set out in **ES Volume 3, Appendix 3.1: Site Selection Assessment Report (SSAR) [AS-019]** the Applicant reviewed available brownfield land within 25km

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				of the POC at Monk Fryston Substation. The assessment concluded that there were no sites within the search area of sufficient size to accommodate a large-scale solar development, either individually or cumulatively. The sites assessed were too small to support the Proposed Development and were largely allocated for housing or mixed-use development, in line with local planning policies, thereby creating a conflict with the intended use for renewable energy infrastructure. Therefore, it was concluded that there was no available or suitable brownfield land for the purposes of the Proposed Development.
RNC-07	Rooftops Not Countryside	Agricultural Land and Soils	Agricultural land and food security The Core Strategy states: "Protecting high quality agricultural land is important" (para 4.18) This Proposed Development results in: Long-term loss of Grade 1 and 2 land Risk of: > Soil degradation > Contamination > Reduced productivity Modern farming productivity is not reflected in outdated land classifications. This conflicts with: Local policy DEFRA food security priorities	Objective 17 of the Selby Core Strategy is concerned with 'protecting the best and most versatile agricultural land and enhancing the wider countryside for its important landscape, amenity, biodiversity, flood management, recreation and natural resource value'. An assessment of the potential effects of the Proposed Development on soils and agricultural land is provided in **ES Volume 1, Chapter 5: Agricultural Land and Soils [APP-043]**. Measures to avoid and minimise effects on soils and agricultural land are embedded within the Proposed Development design and secured through Schedule 2, Requirement 17 of the **Draft Development Consent Order (DCO) [APP-017]** which includes the preparation and implementation of a Soil Resource Management Plan (SRMP) in substantial accordance with the **Outline SRMP [APP-203]**. The SRMP will control soil handling, storage and reinstatement during construction, operation and decommissioning, and a requirement to prepare and implement a Decommissioning Environmental Management Plan in substantial accordance with the **Outline Decommissioning Management Plan (oDEMP) [APP-194]**, which is secured by Schedule 2, Requirement 19 of the **Draft Development Consent Order (DCO) [APP-017]**. With regard to food security, **ES Volume 1, Chapter 5: Agricultural Land and Soils [APP-043]** states that food security has been considered. The Applicant does not consider that food security will be compromised by the Proposed Development (or solar energy more widely), particularly in the context that the 486 ha of BMV land within the Proposed Development (of which/ approximately 19.1 ha would be required for the permanent elements of the Proposed Development involving soil sealing) would represent approximately 1% of the likely BMV land in Selby District and 0.08% of the likely BMV land in the Yorkshire and Humber Region. It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the NPPF. Further, the Government's UK Solar Roadmap (2024) (Ref 27) states that solar development is not considered to compromise food security, and that climate change itself poses the greatest long-term risk to food production - a risk which the Proposed Development directly helps to address by providing a secure, low-carbon source of electricity.
RNC-08	Rooftops Not Countryside	Construction and decommissioning	Failure of restoration claims The proposal assumes land will be restored after 60 years. Evidence suggests otherwise: Local sites such as Gascoigne Wood remain brownfield	The Applicant recognises the importance of restoring the land following decommissioning and is committed to ensuring that appropriate measures are secured to achieve this. At the end of the Proposed Development's operational life, all Solar PV Sites would be decommissioned and the land restored to its original use and condition as far as practicable. There will be opportunities for the retention of a range of

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
			No credible restoration guarantee exists This undermines claims of reversibility.	biodiversity improvements, including established habitats, hedgerows and woodland, beyond the decommissioning of the Proposed Development, ultimately enhancing the ecological value of the area. Measures to manage decommissioning and reinstatement are set out in the **Outline Decommissioning Environmental Management Plan (oDEMP) [APP-194]** which has been submitted as part of the DCO Application. Decommissioning will include robust methodologies and control points to avoid contamination of the underlying land with physical or chemical contaminants and will be applied in conjunction with soil resource management measures to be set out within the final DEMP. The Applicant confirms that none of the land will be considered brownfield automatically after decommissioning. The expectation is that the land will return to farming, but the Applicant cannot dictate what will happen to the land post-decommissioning when the Applicant no longer has an interest in the land. However, any proposal taken forward by a landowner after decommissioning would be seen in the context that the lawful use, post-solar, would be the land use that is currently taking place on that land. A detailed Decommissioning Environmental Management Plan will be prepared substantially in accordance with the **Outline Decommissioning Environmental Management Plan (oDEMP) [APP-194]** and must be submitted to and approved by the relevant local planning authority prior to the commencement of decommissioning. This is secured through Requirement 19 in Schedule 2 of the **Draft Development Consent Order (DCO) [APP-017]**. In addition, the Applicant is seeking a time-limited consent for the Proposed Development to have an operational period of 60 years, with decommissioning to take place following cessation of operation. This is secured by Requirement 19 in Schedule 2 of the **Draft Development Consent Order (DCO) [APP-017]**.
RNC-09	Rooftops Not Countryside	Biodiversity and Ecology	Core Strategy requires: "protection and enhancement of green infrastructure" (para 3.28) "support ecological networks" (para 4.30) Failures: Wildlife corridors: > Too narrow > Fragmented Habitats: > Severed > Degraded	Policy SP18 (Protecting and Enhancing the Environment) in the Selby Core Strategy 2013 is concerned with safeguarding the 'high quality and local distinctiveness of the natural and man-made environment', including features of biological and geological importance and the District's Green Infrastructure. Potential impacts of the Proposed Development on ecology and biodiversity are assessed in **ES Volume 1, Chapter 6: Biodiversity [APP-044]** and **Chapter 12: Ornithology [APP-050]**, which considers baseline conditions and evaluates likely effects during construction, operation and decommissioning. The ecological mitigation and enhancement proposals, including BNG measures, are illustrated on the **Outline Environmental Masterplans (OEM) [PDA-003 to PDA-010]** and detailed in the **Outline Landscape and Ecological Management Plan (oLEMP) [APP-195]** and the **Outline Bird Mitigation Area Management Plan (oBMAMP) [APP-205]**. The **oLEMP [APP-195]** includes provisions for habitat establishment, maintenance and ecological monitoring to confirm that mitigation and enhancement measures are functioning as intended and to

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				identify and implement remedial measures where required. It is expected that the Proposed Development will have a gain of approximately 78.58% for habitats, 73% for hedgerows, and 10.42% for watercourses based on the current development proposals. Full details of the gain are set out in the **Biodiversity Net Gain (BNG) Report [APP-220]**. With regards to habitat fragmentation, existing commuting corridors within the Solar Development Sites, such as hedgerows, ditches, and treelines will be retained, buffered, and appropriately protected through all phases of the development to ensure fauna are still able to pass through the development, ensuing habitats do not become fragmented. Furthermore, fencing within the development will be constructed to allow small mammals (including otter and badger), amphibians and reptiles to pass through. In addition, wide commuting corridors are proposed within the Solar Development Sites comprising neutral grassland and other valuable ecological habitats which will remain unfenced, allowing the maintained permeability of the Order Limits for a range of fauna including larger mammals such as deer. The presence of these numerous existing and newly created commuting corridors within the Proposed Development will limit habitat fragmentation within the Order Limits alone and cumulatively when considering impacts of other consented proposals. Furthermore, the arable land that will be lost will be replaced with grassland beneath the solar panels, which will also form suitable commuting habitat for a range of fauna, and due to the halt of detrimental farming practices (e.g. extensive pesticide use), will improve the biodiversity of the Order Limits post development.
RNC-10	Rooftops Not Countryside	Landscape and visual	Inadequate setbacks from homes and public areas Infrastructure is too close to: Residential properties Businesses Footpaths and bridleways This causes: Severe visual intrusion Psychological harm Loss of amenity Financial loss	The use of buffer zones is set out in the **Design Parameters and Commitments document [APP-217]** and the **Design Approach Document (DAD) [APP-216]**. As detailed in the **Design Parameters and Commitments document [APP-217]**, the minimum offset from residential properties will be 30 m from the curtilage of the property. This buffer zone was established following pre-application consultation, EIA scoping, and environmental surveys and assessments. The Applicant is confident that the proposed management and mitigation measures set out in the **Environmental Statement [APP-038 to APP-190]** are comprehensive and robust, and will assist in reducing the impacts of the Proposed Development on the local population. Of particular relevance to the assessment of effects on local communities are **ES Volume 1, Chapter 10: Landscape and Visual [APP-048], Chapter 11: Noise and Vibration [APP-049], Chapter 13: Socioeconomics [APP-051], Chapter 14: Traffic and Movement [APP-052],** and **Chapter 16: Other Environmental Matters [APP-054],** all of which consider potential impacts on residential properties and local communities and include mitigation measures that are based on good practice used on projects across the UK, as well as measures developed in response to the sensitivities of the local environment.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				Chapter 13: Socioeconomics [APP-051] assesses impacts on Public Right of Way (PRoW) users and concludes there will be a minor adverse (not significant) effect on users. **Chapter 13: Socioeconomics [APP-051]** assesses impacts on local businesses and concludes there will be a minor adverse (not significant) effect on the following businesses: Birkin Fisheries Tea Room, Birkin Fishery, Fairfield Equine Facilitated Wellbeing, Gascoigne Wood Fishery. The impacts to Fairfield Equine Facilitated Wellbeing in the context of it providing therapeutic services, is also further explored in the **Equality Impact Statement (EQIA) [APP-212]**.
RNC-11	Rooftops Not Countryside	Climate Change Resilience and Greenhouse Gas Emissions	No credible whole-life carbon assessment	**ES Volume 1, Chapter 9: Greenhouse Gas Emissions [APP-047]** assesses the greenhouse gas emissions for the life cycle of the Proposed Development, with the detailed assessment included in **ES Volume 3, Appendix 9.1: Greenhouse Gas Emissions Assessment [APP-166]**.
RNC-12	Rooftops Not Countryside	Human health	Severe impacts on: Mental health Residential amenity Community wellbeing	With regard to mental health and wellbeing, the LVS EIA Scoping Report (November 2024) considered the potential effects of the Proposed Development on population health. This considered the likely impacts of the project on the social, economic and environmental determinants of health and the location and sensitivity of the resident population and community receptors. As described in the **Scoping Report [APP-143]**, no potentially significant effects on population health were identified and human health was scoped out of the **Environmental Statement (ES) [APP-038 to APP-190]**. This conclusion was supported by the Planning Inspectorate (PINS) in their **Scoping Opinion [APP-144]**. However, there have been ongoing discussions with North Yorkshire Council (NYC) 's Public Health team to confirm that there are no potentially significant effects on population health, including mental health, in combination with other nearby projects. The Applicant considers that the evidence does not suggest a significant adverse effect on physical or mental health at population level as a result of the Proposed Development. However, it is considered that perceptions and concerns during the planning stages and adverse environmental effects during construction and operation may lead to reduced quality of life and mental wellbeing for some individuals. This is most likely to apply to residents in close proximity to the Order Limits. The Applicant has sought to reduce the effects of this through active and focused community engagement throughout the application process; and through development of a suite of management plans that set out how environmental effects during construction will be managed to reduce any effects, including a construction traffic management plan. In the context of community wellbeing, the Proposed Development will protect and enhance access to recreational spaces with the protection of PRoW and inclusion of new permissive paths, as secured through **Outline Landscape and Ecological Management Plan (oLEMP) [APP-195].** These new routes provide an opportunity to create an enhanced and better-connected network of recreational routes within the local area, adding to the existing PRoW network and providing increased opportunity for recreation in the areas surrounding the Proposed Development.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				With respect to residential visual amenity, Landscape Institute Technical Guidance Note (TGN) 01/24 explains in point 6(1) that views from houses and individual properties are a matter of private amenity, noting that it is an established planning principle that there is no right to a view. The LVIA has not identified any significant adverse residual effects on the views of residents that would breach the Residential Visual Amenity threshold and cause serious harm to the living conditions of residents (major adverse) and therefore a Residential Visual Amenity Assessment (RVAA) has not been carried out. Further information is provided in Table 10-5 of **ES Volume 1, Chapter 10: Landscape and Visual [APP-048]**. The location of residential receptors was factored into the design of the Proposed Development. The **Design Approach Document (DAD) [APP-216]** establishes clear principles for the siting of infrastructure, including the avoidance of unacceptable effects on residential amenity and the retention of appropriate separation from properties through embedded design measures. In line with these principles, the layout has been iteratively refined to incorporate setbacks from residential receptors, retention of existing field boundaries, and the use of offsets to PRoW and properties, alongside the integration of additional mitigation planting, including hedgerow reinforcement and new woodland belts, to filter and soften views. Where properties are in closer proximity, the design includes localised landscape buffers and planting proposals to maintain visual separation, avoid overbearing and minimise enclosing effects. Mitigation measures are shown on the **Outline Environmental Masterplans (OEM) [PDA-003 to PDA-010]** and are secured via the **Works Plans [AS-004]**, **Outline Landscape and Ecological Management Plan (oLEMP) [APP-195]**, and the **Design Parameters and Commitments document [APP-217]**.
RNC-13	Rooftops Not Countryside	Socioeconomics, Tourism and Recreation	Financial harm to residents and local businesses	The Applicant has submitted the **Book of Reference [APP-022]**. This includes persons who may be eligible to claim compensation if the Development Consent Order is granted and the Proposed Development developed. Under Part 1 of the Land Compensation Act 1973, property owners (Category 3) are eligible to claim compensation for any physical impacts from the operation of the Proposed Development, such as noise and vibration. The Applicant acknowledges concerns regarding effects on local businesses. **ES Volume 1, Chapter 13: Socioeconomics [APP-051]** concludes that no significant adverse socio-economic effects are expected once embedded mitigation and additional mitigation measures are applied. The Applicant will continue dialogue with local businesses to address any project specific queries. As set out in the **Outline CEMP [APP-192]** and the chapter, specific mitigation measures for identified businesses have also been proposed. The local economy will benefit through the use of local businesses, such as use of accommodation, cafés and restaurants, by construction workers. The Applicant has proposed measures to maximise local employment, skills development, and socioeconomic benefits throughout the construction, operation, and decommissioning phases. Local recruitment will be prioritised where practicable through engagement with Job Centre Plus, local authorities, and recruitment agencies, alongside initiatives to promote diversity, equality, and

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				inclusion, particularly for underrepresented groups. Support for the local economy will be strengthened through 'meet the buyer' events and proactive supply chain engagement. In parallel, education and skills development will be advanced through apprenticeships and vocational training in relevant sectors, collaboration with further and higher education providers to deliver academic and site-based learning opportunities, and targeted STEM outreach and careers engagement with schools and colleges. These measures are further detailed in and secured via the **Outline Skills, Supply Chain and Employment Plan (oSSCEP) [APP-202]**).
RNC-14	Rooftops Not Countryside	Landscape and visual	Conflict with Policy SP2 – Inappropriate development in the countryside Policy SP2 requires: > "protecting the countryside from inappropriate development" This Proposed Development represents industrial-scale development in open countryside, entirely misaligned with the settlement hierarchy. Scale comparison: South Milford: 56 hectares Monk Fryston & Hillam: 52 hectares Hambleton: 58 hectares Birkin: 8 hectares Escrick: 38 hectares Proposed sites: Site 1: 344.8 hectares Site 4: 283.8 hectares Site 2: 83.3 hectares Site 3: 19.9 hectares Site 6: 99.6 hectares Site 7: 8.7 hectares Site 8: 60 hectares This is clearly excessive, unjustified, and inappropriate development.	The Applicant notes this comment. The relevant policy relating to the countryside in the Selby Core Strategy 2013 is Policy SP2 (Spatial Development Strategy), with part C seeking to limit the type and scale of development within the countryside. In regards to Policy SP2, it is acknowledged that the Proposed Development is located principally in the Sleby Countryside. The location has been informed by: available grid connection at Monk Fryston, site availability within reasonable proximity of the grid connection location, avoiding environmentally (including heritage) constrained land. Further information is set out in ES Chapter 3: Alternatives and Design Iteration. The Proposed Development is estimated to support some 434 jobs through the construction phase of which half would be from the local area. The **Planning Statement [APP-207]** and **Policy Compliance Document [APP-224]** demonstrate how the Applicant has considered and responded to national and local policy. It is therefore considered that the Proposed Development is compliant with local and national policy in respect to the principle of development and its consideration of environmental impacts. The Proposed Development is anticipated to help meet the UK's net zero requirements for energy production, which is considered a critical national priority and set out in National Policy Statements for Energy NPS EN-1 (Section 4.2) and EN-3. As set out in NPS EN -1, there is a presumption in favour of CNP Infrastructure projects in the planning balance, where specific requirements are met. The Applicant considers the tests for the presumption in favour of CNP development to be satisfied due to the Proposed Development's significant contribution to renewable energy, energy security, biodiversity gains, and wider environmental and public benefits. The **Design Parameters and Commitments document [APP-217]** and the **Design Approach Document (DAD) [APP-216]** sets out the Applicant's approach to addressing the criteria for good design for energy infrastructure set out in Section 4.7 of NPS EN-1 more broadly. The Proposed Development has been designed to ensure that its scale and form are appropriate to its function as nationally significant infrastructure, while seeking to avoid, minimise and/or mitigate potential harmful effects. The overall extent of the development reflects the land required to support viable renewable energy generation and an efficient grid connection, alongside substantial provision for environmental mitigation and

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				enhancement. As per the description set out in **ES Volume 1, Chapter 2: The Proposed Development [APP-040]** the total area within the DCO Order Limits encompasses approximately 1,270 hectares (ha). Of this, the 'Solar Development Sites' comprise approximately 900 ha of land. Around 680 ha of this land is proposed as being required for installation of solar PV panels and associated infrastructure. The remaining 220 ha would provide areas dedicated to ecological mitigation, measurable Biodiversity Net Gain (BNG) delivery, landscaping, offsets and agricultural land managed for environmental enhancement and habitat creation. The Applicant remains committed to delivering a Proposed Development that makes a meaningful contribution to the UK's transition to net zero, while also seeking to minimise adverse impacts and maximise opportunities for environmental enhancement and community benefits.
RNC-15	Rooftops Not Countryside	The Proposed Development and DCO Process	Temporary" is misleading – this is permanent industrialisation Lifespan: ~60 years Includes: Deep piling BESS infrastructure Substations This is not temporary use, but long-term industrialisation of rural land.	The use of the term 'temporary' reflects that the Proposed Development is time-limited and will be decommissioned at the end of its operational life (approximately 60 years), with decommissioning to take place following cessation of operation. This is secured by Requirement 19 in Schedule 2 of the **Draft Development Consent Order (DCO) [APP-017]**. While the operational period is long-term, the development does not represent permanent industrialisation of the land. The majority of the Site would remain undeveloped aside from surface-mounted infrastructure, and the effects are reversible following decommissioning. It is recognised that some components (e.g. substations, BESS infrastructure and deep foundations) would give rise to longer-term change during the operational period, however, these are limited in extent and have been assessed accordingly in the **Environmental Statement (ES) [APP-038 to APP-190]**.
RNC-16	Rooftops Not Countryside	Human health	Quality of life and mental health impacts The Core Strategy requires: "Development should contribute to safe, healthy communities" (para 3.11) Reality for residents: Already experiencing: Stress Anxiety Physical health impacts Mental health impacts If approved: Residents will: Live within an industrial landscape Lose peace, tranquillity and open views Experience further mental and physical harm Children's wellbeing and safety will also be affected.	Effects on health and wellbeing were considered at the EIA Scoping stage. This considered the likely impacts of the project on the social, economic and environmental determinants of health and the location and sensitivity of the resident population and community receptors. As described in the **Scoping Report [APP-143]**, no potentially significant effects on population health were identified and human health was scoped out of the **Environmental Statement (ES) [APP-038 to APP-190]**. This conclusion was supported by the Planning Inspectorate (PINS) in their **Scoping Opinion [APP-144]**. The Applicant considers that the evidence does not suggest a significant adverse effect on physical or mental health at population level as a result of the Proposed Development. However, it is recognised that perceptions and concerns during the planning stages and adverse environmental effects during construction and operation may lead to reduced quality of life and mental wellbeing for some individuals. This is most likely to apply to residents in close proximity to the Order Limits. The Applicant has sought to reduce the effects of this through active and focused community engagement, and engagement with individuals, throughout

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			This directly conflicts with: para 2.1 (quality of life) para 3.11 (health and wellbeing)	the application process; and through development of a suite of management plans that set out how environmental effects during construction will be managed to reduce any effects. The Landscape and Visual Impact Assessment (LVIA) reported in **ES Volume 1, Chapter 10: Landscape and Visual [APP-048]** acknowledges that there will be lasting changes to landscape character, tranquillity and views for the duration of the operation of the Proposed Development. This aligns with NPS EN-1 (paragraph 5.10.5), which recognises that significant energy infrastructure projects inevitably result in adverse landscape effects. The design of the Proposed Development includes extensive mitigation such as retaining and strengthening hedgerows and woodland, new planting around sensitive receptors and careful siting of infrastructure to reduce the landscape and visual effects. Temporary reductions in tranquillity may be felt during construction as a result of noise and night time lighting from works. During operation, at year 1 the introduction of solar panels and associated infrastructure will introduce structures into the landscape and the general tranquillity of the Sites will reduce, particularly whilst new planting along field boundaries and within setbacks has not yet established. However, by Year 15, whilst there will be some reduction in tranquillity due to overt signs of human activity, these impacts are partly offset by the new landscape structure and habitat creation. Advanced planting that has been committed to in the **oLEMP [APP-195]**, will also help to reduce impacts on tranquillity. The Applicant considers the Proposed Development to be compliant with policies in the Selby Core Strategy 2013.
RNC-17	Rooftops Not Countryside	Biodiversity and Ecology	The development will: Displace species Reduce biodiversity resilience Fail to deliver meaningful biodiversity net gain	The Applicant has addressed this comment above. The Applicant disagrees with this comment. The Proposed Development will result in a net gain in biodiversity as well as incorporating enhancements. The ecological mitigation and enhancement proposals, including BNG measures, are illustrated on the **Outline Environmental Masterplans (OEM) [PDA-003 to PDA-010]** and detailed in the **Outline Landscape and Ecological Management Plan (oLEMP) [APP-195]** and the **Outline Bird Mitigation Area Management Plan (oBMAMP) [APP-205]**. The **oLEMP [APP-195]** includes provisions for habitat establishment, maintenance and ecological monitoring to confirm that mitigation and enhancement measures are functioning as intended and to identify and implement remedial measures where required. It is expected that the Proposed Development will have a gain of approximately 78.58% for habitats, 73% for hedgerows, and 10.42% for watercourses based on the current development proposals. Full details of the gain are set out in the **Biodiversity Net Gain (BNG) Report [APP-220]**.
RNC-18	Rooftops Not Countryside	Ornithology	Missing bird surveys for Sites 6, 7 and 8 No full two-winter survey period This undermines the ecological assessment.	The details of the bird surveys for Sites 6, 7 and 8 are discussed within Section 12.6 of **ES Volume 1, Chapter 12: Ornithology [APP-050]** as well as **ES Volume 3, Appendix 12.2: Non-breeding Bird Survey Report [AS-029 to AS-031]**, and **Appendix 12.3: Breeding Bird Survey Report - Solar Development Sites 6-8 [AS-032]**.

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				Wintering and passage surveys have been undertaken in line with Natural England's advice through Discretionary Advice Service. The use of a one full year baseline surveys was assessed alongside cropping conditions, flood data and the lower Derwent valley wetland bird survey data (WeBS) which spans across a five-year period- beyond the standard process. This approach was undertaken through significant engagement and agreement with Natural England. A precautionary approach was adopted that goes beyond what is typically considered standard practice when a two-year approach is used. Further to this, there are comparable developments with larger and more regular counts of bird species (waterbirds) which have not offered mitigation of this size. Inter annual variability is acknowledged throughout the documents and the examples provided within the **Shadow Habitats Regulations Assessment (sHRA) [APP-223]** using other comparable solar NSIP sites evidence that numbers can fluctuate significantly, both up and down per annum.
RNC-19	Rooftops Not Countryside	Community benefit	Community benefits are inadequate and insecure	The Applicant is committed to providing a Community Benefit Fund to allow for community driven benefits that are not necessarily associated with the Proposed Development itself as the Applicant agrees that the communities closest to the project should benefit from it. The Applicant will continue to engage locally to shape a community Benefit Fund that works for the community.
RNC-20	Rooftops Not Countryside	Socioeconomics, Tourism and Recreation	Permissive footpaths: Can be removed at any time Offer no guarantee They must be replaced with: Permanent, legally protected public rights of way.	The Applicant notes these concerns regarding permissive footpaths. The provision of approximately 8 km (5 miles) of new permissive paths (as shown on the **Outline Environmental Masterplans (OEM) [PDA-003 to PDA-010]**) will ensure that access to nature and the countryside for recreational users is maintained and enhanced. The DCO requires that the measures in the detailed LEMP (which will provide the full details of the permissive paths) must be maintained for the lifetime of the Proposed Development. As at the date of decommissioning, as defined in the DCO Application, the requirement to provide the permissive paths will cease in order that the land can be returned to its pre-development state including original PRoWs and the removal of permissive paths, unless the landowners decide to retain them.
RNC-21	Rooftops Not Countryside	Consultation and Engagement	Consultation failures Core Strategy requires: "Local communities should be actively involved…" (para 1.6) Failures include: Adjacent residents not consulted Missing or unclear maps Lack of accessible materials This undermines: Democratic planning Planning Act consultation requirements	The Applicant respectfully disagrees with the respondent. The Applicant undertook its consultation in compliance with all legislation and guidance on consultation (See **Consultation Report Appendix 1: Statement of Compliance [APP-025]**), as well as commitments made in its published Statement of Community Consultation (See **Consultation Report Appendix 4: Statement of Community Consultation Materials [APP-028]**), which in turn was informed by consultation with the relevant host authority. This process is described in Chapter 6 (Preparation for Statutory Section 47 Consultation) of the **Consultation Report [APP-024]**.

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				To determine members of the public to consult, the Applicant identified a Core Consultation Zone (CCZ) and, in the first instance, issued 12,500 postcards setting out the details of the Phase One Consultation. The Applicant then mapped a Core Consultation Zone (CCZ) for the Phase Two Consultation, which local authorities were consulted on. This CCZ included over 14,000 addresses, which were sent two postcards in advance of the Phase Two (statutory) consultation. These addresses were mapped using the most up to date Royal Mail data available and subsequently posted using Royal Mail's postal service. In addition, the Applicant also sent notices to Local Information Points, published statutory notices in the York Press, the Selby Times, and The Guardian, alongside advertisements in the York Press and Selby Times. Local Information Points also received posters which, like the notices and advertisements, provided details for statutory consultation and how members of the public could take part. The Applicant made all consultation materials available online, at Community Access Point (CAP) sites, at public information events and by request to the communication channels. The Applicant notes all consultation materials have remained accessible on the project website and have also been evidenced within **Consultation Report Appendix 6 Part A [APP-030] and Part B [APP-031]**. Regarding missing or unclear maps, the maps produced at consultation were illustrative and could not include all detail without compromising the quality of the maps. The Applicant had a range of consultation materials and maps present at the consultation events, detailing different aspects of the Proposed Development site. Within the **Environmental Statement [APP-038 to 190]**, a number of maps and plans have been produced that contain various environmental and local features, including local landmarks, road names and listed buildings. While the maps produced specifically for Phase Two (statutory) consultation have remained accessible online or via request, all maps included as part of the DCO application have been made available on the Planning Inspectorate's website, and physical or USB-held versions continue to be available upon request. The Applicant acknowledges difficulties some may have had with accessing the **Outline Environmental Masterplans (OEM) [PDA-003 to PDA-010]** and can confirm that, as mentioned above, this is available upon request; OEMs by site remain accessible on the project website.
RNC-22	Rooftops Not Countryside	The Proposed Development and DCO Process	Rochdale Envelope – lack of certainty The Proposed Development relies on indicative layouts. Core Strategy requires: "Development proposals should be supported by sufficient information" (para 1.8) Impacts cannot be properly assessed at this scale.	The EIA presented within the ES has been undertaken adopting the principles set out in the Planning Inspectorate's Advice Note Nine: Rochdale Envelope which provides guidance regarding the degree of flexibility that may be considered appropriate within an application for development consent under the Planning Act 2008. **Environmental Statement Volume 1, Chapter 2: The Proposed Development [APP-040]** and the **Design Parameters and Commitments document [APP-217]** set out for each technical discipline, the maximum (and where relevant, minimum) parameters for the elements where flexibility needs to be retained have been assessed under the Rochdale Envelope approach. The approach also recognises that the worst-case parameter for one technical assessment may differ from another, ensuring that worst case overall impacts are predicted. The maximum lateral spatial extents are shown on the **Works Plans [AS-004]**.

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				These parameters are not illustrative – they are set and secured via the DCO. The Applicant's approach is consistent with DCO practice for all project types. Each technical chapter (**ES Volume 1, Chapter 5 [APP-043] to Chapter 16 [APP-054]**) considers the parameters relevant to their assessment.
RNC-23	Rooftops Not Countryside	Socioeconomics, Tourism and Recreation	Property value and financial harm The proposal will cause: Significant reduction in property values Loss of desirability Financial harm to residents and businesses This is a material planning consideration.	The Applicant has submitted the **Book of Reference [APP-022].** This includes persons who may be eligible to claim compensation if the Development Consent Order is granted and the Proposed Development developed. Under Part 1 of the Land Compensation Act 1973, property owners (Category 3) are eligible to claim compensation for any physical impacts from the operation of the Proposed Development, such as noise and vibration. However, compensation is not available for loss of value due to visual impacts or diminished views—this is consistent with established planning law. The Applicant will comply with statutory process for any compensation claims submitted and will review and assess each claim in accordance with the relevant legislation under which it is made. The Applicant is voluntarily offering to provide a Community Benefit Fund and will continue to engage locally to shape a Community Benefit Fund that works for the community.
RNC-24	Rooftops Not Countryside	Battery safety	BESS fire risk and rural emergency response Fire risk associated with BESS infrastructure Limited rural fire service capacity This is insufficiently addressed.	The Applicant's **Outline Battery Safety Management Plan (oBSMP), [APP-196]** sets out the proposed approach for management of fire safety risk. The **oBSMP [APP-196]** stipulates that the Applicant at detailed design will only select a BESS system that as mandated under NFPA 855 (2026 Revision) must have undertaken Large Scale Fire Testing (LSFT). Final BESS design and site layout will be validated through LSFT and rigorous consequence modelling to minimise the requirement for any NYFRS intervention in a thermal runaway incident. LSFT will establish minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or Energy Storage System (ESS) equipment. **ES Volume 3, Appendix 16.5: BESS Fire Emissions Modelling Technical Note [APP-187]** assesses the battery fire emission impact and concludes there would be no significant air quality effects as a result of a BESS fire incident. At the detailed design stage a BESS system and site-specific Plume Analysis study will be conducted to assess the environmental impact of a site incident to sensitive receptors within a 1 km radius. The Emergency Response Plan (ERP) produced at the detailed design stage (template outlined in Section 4.4.4 of the **oBSMP [APP-196]**) will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider. Section 5 of the **oBSMP [APP-196]** outlines a comprehensive list of pre-construction requirements to ensure that BESS failure safety risks are minimised and hazards fully mitigated. With regard to the capacity of the fire service, as detailed in Section 2.1 of the **oBSMP [APP-196]**, North Yorkshire Fire and Rescue Service have been consulted during pre-application discussions and as part of statutory

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				consultation, and engagement will continue across the project lifecycle to ensure that all key site safety and emergency response requirements are delivered.
RNC-25	Rooftops Not Countryside	Climate Change Resilience and Greenhouse Gas Emissions	Storm resilience concerns Evidence from Camblesforth solar site (Storm Dave) shows: Panel damage Debris left on land The application does not adequately address resilience.	**ES Volume 1, Chapter 7: Climate Change Resilience [APP-045]** assesses the likely significant effects arising from future climate change on the Proposed Development during the operation (including maintenance) and decommissioning phases. The assessment details how the Proposed Development has designed to be resilient against adverse environmental effects of climate change through design development and the consideration of good design principles. The Applicant understands the concerns regarding this, especially in light of what happened at Camblesforth. The solar farm at Camblesforth is currently in its construction phase, and we understand the situation is being investigated by the owner and their contractor. The components of the Proposed Development would be designed to withstand the range of UK weather, including storms. Solar panels are typically rated for up to 140mph wind speeds, equivalent to a mid-range Category 4 hurricane. Although rare, wind speeds above this have been recorded in the UK, but only in highland or coastal areas; inland areas of the UK are much less prone to high wind speeds. The Meteorological Office say that in the Selby and York areas mean wind speeds are up to 15 knots, or just over 17mph. The Applicant intends to use panels that are rated to withstand high wind speeds, as well as other extreme conditions, such as hail. As such, panels are typically tested using the International Electrotechnical Commission (IEC) 61215 impact test, a long-standing hail impact test used across the industry. If used, tracker panels can move into a position which minimises both wind effects and hail damage. In addition to the testing, rating and in-built technology of solar panels, planted visual mitigation measures would also have the added benefit of serving as windbreaks for the solar panel sites, significantly reducing the impact of wind gusts. In the unlikely event that a storm or extreme weather event does hit, plans and measures would be in place and are set out within Section 2.13 of the **Outline Operation Environmental Management Plan (oOEMP) [APP-193]**.
RNC-26	Rooftops Not Countryside	Climate Change Resilience and Greenhouse Gas Emissions	Failure to meet emerging Local Plan Climate policy (SP3): Requires net zero carbon No whole-life carbon assessment provided	The emerging Selby Local Plan 2024 is no longer considered relevant policy, given the Plan is no longer progressing and will be replaced by the future North Yorkshire Local Plan. However, the Proposed Development is in alignment with adopted local and national policies concerned with climate change, as addressed in the **Planning Statement [APP-207]** and **Policy Compliance Document [APP-224]**. With regard to net zero carbon and carbon assessment, **ES Volume 1, Chapter 9: Greenhouse Gas Emissions [APP-047]** assesses the effects of emissions generated from embodied carbon within products to be used on site, as well as construction, operation and decommissioning emissions. The CO_2e figures are included in detail within **ES Volume 3, Appendix 9.1: Greenhouse Gas**

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				Emissions Assessment [APP-166]. Emissions from production of the required cables are included within the assessment.
RNC-27	Rooftops Not Countryside	The Proposed Development and DCO Process	Balance of burden – unfair and disproportionate impact This development places disproportionate burden on a small number of residents, who will: Be enclosed within infrastructure Suffer loss of amenity Experience financial and psychological harm This is neither fair nor justified.	The Applicant acknowledges that the Proposed Development would introduce changes to the character of parts of the landscape and that any adverse effects from the Proposed Development are more likely to be felt locally than the largely wider-scale benefits of the Proposed Development. The **Design Approach Document (DAD) [APP-216]** establishes clear principles for the siting of infrastructure, including the avoidance of unacceptable effects on residential amenity and the retention of appropriate separation from properties through embedded design measures. In line with these principles, the layout has been iteratively refined to incorporate setbacks from residential receptors, retention of existing field boundaries, and the use of offsets to PRoW and properties, alongside the integration of additional mitigation planting, including hedgerow reinforcement and new woodland belts, to filter and soften views. Where properties are in closer proximity, the design includes localised landscape buffers and planting proposals to maintain visual separation, avoid overbearing and minimise enclosing effects. Mitigation measures are shown on the **Outline Environmental Masterplans (OEM) [PDA-003 to PDA-010]** and are secured via the **Works Plans [AS-004]**, **Outline Landscape and Ecological Management Plan (oLEMP) [APP-195]**, and the **Design Parameters and Commitments document [APP-217]**. The provision and management of PRoW is addressed within **ES Volume 1, Chapter 13: Socioeconomics [APP-051]** and in the **Outline Public Rights of Way Management Plan (oPROWMP) [APP-199]** submitted as part of the Application. These documents detail how the Applicant has embedded mitigation measures to maintain the amenity of Public Rights of Way (PRoW) and the creation of new permissive paths which will ensure that residents can still travel throughout the local area during construction. With respect to private views, Landscape Institute Technical Guidance Note (TGN) 01/24 explains in point 6(1) that views from houses and individual properties are a matter of private amenity, noting that it is an established planning principle that there is no right to a view. The LVIA has not identified any significant adverse residual effects on the views of residents that would breach the Residential Visual Amenity threshold and cause serious harm to the living conditions of residents (major adverse) and therefore a Residential Visual Amenity Assessment (RVAA) has not been carried out. Further information is provided in Table 10-5 of **ES Volume 1, Chapter 10: Landscape and Visual [APP-048]**. The Applicant has submitted the **Book of Reference [APP-022].** This includes persons who may be eligible to claim compensation if the Development Consent Order is granted and the Proposed Development developed. Under Part 1 of the Land Compensation Act 1973, property owners (Category 3) are eligible to claim compensation for any physical impacts from the operation of the Proposed Development, such as noise and vibration.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				However, compensation is not available for loss of value due to visual impacts or diminished views—this is consistent with established planning law. The Applicant will comply with statutory process for any compensation claims submitted and will review and assess each claim in accordance with the relevant legislation under which it is made.
RNC-28	Rooftops Not Countryside	Landscape and visual	If consent is granted, the Proposed Development must include minimum 300-metre residential buffer zones.	With respect to private views, Landscape Institute Technical Guidance Note (TGN) 01/24 explains in point 6(1) that views from houses and individual properties are a matter of private amenity, noting that it is an established planning principle that there is no right to a view. The LVIA has not identified any significant adverse residual effects on the views of residents that would breach the Residential Visual Amenity threshold and cause serious harm to the living conditions of residents (major adverse) and therefore a Residential Visual Amenity Assessment (RVAA) has not been carried out. Further information is provided in Table 10-5 of **ES Volume 1, Chapter 10: Landscape and Visual [APP-048]**. The Applicant has incorporated setbacks from residential properties as set out in the **Design Parameters and Commitments document [APP-217]** and this is explained further in the **Design Approach Document (DAD) [APP-216]**, which sets out the Applicant's approach to addressing the criteria for good design for energy infrastructure set out in Section 4.7 of NPS EN-1 more broadly. Standard offsets from residential properties to solar farm development are not defined in law or policy and the Applicant has established a minimum offset from residential properties of 30m from the curtilage of properties for the Proposed Development. This minimum offset was established following pre-application consultation, EIA scoping, and environmental surveys and assessments, including the LVIA. The layout has been iteratively refined to incorporate setbacks from residential receptors, retention of existing field boundaries, and the use of offsets to properties, alongside the integration of additional mitigation planting, including hedgerow reinforcement and new woodland belts, to filter and soften views. Where properties are in closer proximity, the design includes localised landscape buffers and planting proposals to maintain visual separation, avoid overbearing and minimise enclosing effects. Mitigation measures are shown on the **Outline Environmental Masterplans (OEM) [PDA-003 to PDA-010]** and are secured via the **Works Plans [AS-004]**, Outline **Landscape and Ecological Management Plan (oLEMP) [APP-195]**, and the **Design Parameters and Commitments document [APP-217]**.
RNC-29	Rooftops Not Countryside	Biodiversity and Ecology	If consent is granted, the Proposed Development must deliver genuine green infrastructure, including mature trees, wildflower meadows, and wide wildlife corridors.	A comprehensive package of habitat retention, creation, enhancement and long-term management measures is proposed to avoid, reduce and mitigate impacts and to deliver Biodiversity Net Gain. These include the protection of existing habitats, creation of new habitats, and long-term ecological management to improve habitat quality over the lifetime of the Proposed Development. The ecological mitigation and enhancement proposals, including BNG measures, are illustrated on the **Outline Environmental Masterplans (OEM) [PDA-003 to PDA-010]** and detailed in the **Outline Landscape and Ecological Management**

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				Plan (oLEMP) [APP-195] and the **Outline Bird Mitigation Area Management Plan (oBMAMP) [APP-205]**. The **oLEMP [APP-195]** includes provisions for habitat establishment, maintenance and ecological monitoring to confirm that mitigation and enhancement measures are functioning as intended and to identify and implement remedial measures where required. It is expected that the Proposed Development will have a gain of approximately 70% Habitat BNG, including 78.58% for habitats, 73% for hedgerows, and 10.42% for watercourses based on the current development proposals. Full details of the gain are set out in the **Biodiversity Net Gain (BNG) Report [APP-220]**. The preparation, approval and implementation of a detailed Landscape and Ecological Management Plan and BNG Strategy, substantially in accordance with the **oLEMP [APP-195]**, is secured through the **Draft Development Consent Order (DCO) [APP-017]**, ensuring that ecological mitigation and enhancement measures are delivered, monitored and maintained throughout the lifetime of the Proposed Development.
RNC-30	Rooftops Not Countryside	Socioeconomics, Tourism and Recreation	If consent is granted, the Proposed Development must provide permanent public rights of way and achieve a CEEQUAL "Excellent" rating.	The provision and management of PRoW is addressed within **ES Volume 1, Chapter 13: Socioeconomics [APP-051]** and in the **Outline Public Rights of Way Management Plan (oPROWMP) [APP-199]** submitted as part of the Application. These documents detail how the Applicant has embedded mitigation measures to maintain the amenity of Public Rights of Way (PRoW) and the creation of new permissive paths. The Applicant is committed to delivering a sustainable Proposed Development and the design of the permissive paths within the Proposed Development will be subject to the detailed design phase and covered within the detailed PRoWMP. Within EN-3, the approach is set out for maximising opportunities for PRoW enhancement through site layout and design of access, which the Proposed Development will be delivering.
RNC-31	Rooftops Not Countryside	The Proposed Development and DCO Process	We respectfully request that the Examining Authority: Refuse the application Or, at minimum, require: Fundamental redesign Significant reduction in scale Robust protections for residents and environment	The Applicant's **Statement of Need [APP-214]** provides evidence that an unprecedented capacity of new low-carbon generation Proposed Developments is urgently needed for the UK to meet its legally binding climate change targets. The government has confirmed that solar energy is at the heart of the Clean Power 2030 Mission [NPS EN-3 (2025) Paras 2.10.1 & 2.10.2]. The Statement of Need confirms that the need for the Proposed Development is urgent and that substantial weight should be given to the need for the Proposed Development [NPS EN-1 (2023) Para 3.2.9-3.2.10]. A comprehensive package of mitigation has been embedded within the design and would be secured through the draft Development Consent Order and associated certified documents. This includes measures relating to, but not limited to, landscape, ecology, amenity, Public Rights of Way, as set out in the relevant chapters in the **ES [APP-038 to APP-190]** and outline management plans. These measures ensure that effects are appropriately avoided, reduced or mitigated in accordance with the mitigation hierarchy, including for local residents. The Applicant is confident that the proposed management and mitigation measures set out in the **Environmental Statement (ES) [APP-038 to APP-190**]

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				are comprehensive and robust and that the Proposed Development aligns with national and local planning policy; this is outlined in the **Planning Statement [APP-207].** Of particular relevance are Section 6: Legislative and Policy Context and Section 7: Planning Assessment, of the Planning Statement which set out an appraisal of the Proposed Development against national and local planning policies. The Planning Statement concludes that the benefits of the Proposed Development, including meeting the identified urgent need, outweigh its limited adverse impacts.
Time Team of Burton Salmon, Hillam and Monk Fryston				
TT-01	Time Team of Burton Salmon, Hillam and Monk Fryston	Cultural heritage	There are two areas of previously known significant archaeology which have been identified in the planning application by Light Valley Solar and we are concerned that they might not be properly and fully investigated in a timely manner before the areas of land is developed - if planning permission is granted.	Geophysical survey and archaeological evaluation (trial trenching) were undertaken across all Solar Development Sites, the results of which have been utilised to inform Proposed Development design. Where areas could not be avoided by design or impacts mitigated by the use of non-intrusive construction methods, an Archaeological Mitigation Strategy has developed in consultation with the Archaeological Advisor to the LPA. The Archaeological Mitigation Strategy is secured by Requirement 11 of the **Draft Development Consent Order (DCO) [APP-017]**. It sets out a series of pre-construction measures including strip, map and sample excavation and additional trenched investigation to ensure that impacts on the archaeological resource are mitigated. The excavation reports associated with this work will be provided to the NYHER and uploaded to the Archaeology Data Service for public access. The two specific areas mentioned – one area to the south of Siddle House Farm and the site at Burton Salmon are discussed further in the next two responses.
TT-02	Time Team of Burton Salmon, Hillam and Monk Fryston	Cultural heritage	One area is to the southeast of Siddle House which LVS wish to develop with solar panels. Their preliminary investigation has identified 2 Romano - British Kilns in an area of crop marks which indicate a settlement. LVS wish to manage the area using non-invasive techniques. This location has been known to us as an historic site because Siddle House features in the 1320 Survey of Selby Monastery possessions for Edward II - as Southdayle. It is also at a cross roads of ancient routes from Birkin to Cawood and Monk Fryston and further west (Leeds/West Riding area) and Hambleton and further east (Selby/ River Ouse river network - international shipping). The discovery of the two roman kilns is very significant because to the best of our knowledge no other Roman Kilns have been discovered in Selby area. Having made the discovery to leave the site unexcavated for the next 60 Years at least would be very frustrating for local residents and those interested in regional history. The discovery builds on the recognition of our knowledge that this site and locality is significant, there are nearby Retting Ponds which given the new knowledge of 2 pottery kilns could well have had an earlier life as clay pits and be the source of material for the items made in the Kiln. We urge the full archaeological excavation of the	**ES Volume 1, Chapter 8: Cultural Heritage [APP-046]** Table 8-15 and **ES Volume 3, Appendix 8.5: Statements of Significance and Impact Assessment [APP-165]**, Table 5-1 acknowledge the presence of the two kilns within Solar Development Site 2 and identify their value which is assessed as Low. Preservation in situ is considered the gold standard of archaeological mitigation under current legislation and best practice. A presumption of preservation in situ as the preference for archaeological remains is present throughout English legislation, established with the Ancient Monuments and Archaeological Areas Act (1979) and re-enforced within the NPPF (211, 218) and NPS EN-1 (5.9.18). Archaeological mitigation follows a hierarchy with avoidance of impacts through design as best practice. The project seeks to avoid unnecessary impacts to the archaeological resource wherever possible and, as such, these will be preserved in situ for future generations. The area to the southeast of Siddle House is identified in both the **Archaeological Mitigation Strategy [APP-200]** and on **ES Volume 2, Figure 8.4: Archaeological Mitigation Areas [sheet 15] [APP-088]** as an area of concrete feet or other non-ground penetrative techniques to preserve sub-surface archaeological remains in situ (in line with Historic England's Advice Note 15: Commercial Renewable Energy Development and the Historic Environment. As noted in **ES Volume 1, Chapter 8: Cultural Heritage [APP-046]** the exact locations of where archaeological protection is required will be confirmed in the final Construction Environment Management Plan (CEMP) to

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
			site. (GS- S2- 1 on pages 59 and 64 Light Valley Solar Environmental Statement Volume 3, Appendix 8.2: Cultural Heritage Gazetteer Document	be produced at detailed design stage (as outlined within the **Outline CEMP [APP-192]**).
TT-03	Time Team of Burton Salmon, Hillam and Monk Fryston	Cultural heritage	The second site is at Burton Salmon adjacent to where the Cable Route crosses the A162 This site is already known to us as being potentially part of the Early Prehistoric Yorkshire Ritual Landscape has been Identified by LVS as being significant. They have specified that they will strip, map and sample a large section of the area. However, adjacent to Cable Route Corridor is one of the 3 most convincing 'circular cropmark monuments that display penannular or opposed entrance plans that might be equated to Hengiform Monuments' (from Understanding the Cropmark Landscapes of the Magnesian Limestone Published by Archaeological Services of West Yorkshire 2010). There are other crop marks which indicate prehistoric pit alignments nearby. The importance of these items has to be seen in the context of the nearby excavations of Ferrybridge Henge and its Ritual Landscape (see publication of same name by West Yorkshire Archaeological services 2005) - along with the discovery of the Ferrybridge Chariot Burial. The site is on rising ground towards the highest local point, Betteras Hill. This offers panoramic views over the Aire Valley to the south, the Humberhead levels to the east and south - east, northeast towards York and the Wolds, and south - west and west to the Pennines. It is a strategic vantage point and therefore of regional Importance. We believe the area identified by LVS should be extended to include the potential Hengiform monument and great care should be take along this entire corridor length. The site location is Light Valley Solar Environmental Statement Volume 3, Appendix 8.2: Cultural Heritage Gazetteer Document Page 61	The assets MNY9959 and MNY9958 are located c.100m from the order limits and will experience no impacts from the Proposed Development (see **ES Volume 3, Appendix 8.2: Cultural Heritage Gazetteer [APP-160]** and **ES Volume 3, Appendix 8.5: Statements of Significance and Impact Assessments [APP-165]**). A presumption of preservation in situ as the preference for archaeological remains is present throughout English legislation, established with the Ancient Monuments and Archaeological Areas Act (1979) and re-enforced within the NPPF (211, 218) and NPS EN-1 (5.9.18). The strip, map and sample area covers the area which will be impacted by the Proposed Development only. Excavation beyond this area would represent an unnecessary impact on the archaeological resource within an area which will not experience construction impacts.
St. Helen's Church Skipwith Parochial Church Council				
SHPC-01	St. Helen's Church Skipwith Parochial Church Council	Transport and access	St. Helen's church Skipwith is a Grade One listed building with National Interest. We are concerned that the vibration from the AIL vehicles which are to travel down Main street could cause damage to the building. The Tower of the church has already had to be strengthened due to Selby Coalfield mining underneath in 2002.	The Applicant notes this concern. Abnormal Indivisible Load (AIL) movements have been subject to a specific assessment, including routing and swept path analysis, and will be managed by a specialist contractor in coordination with the relevant highway and bridge authorities. These movements will be limited in number and undertaken in a controlled manner following the measures secured within the **Outline Construction Traffic Management Plan (oCTMP) [APP-201]**. Prior to movement, the abnormal load operator is required to obtain the

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				necessary permits and comply with the relevant procedures set by the highway authorities, which includes consideration of route constraints and structural sensitivities. On this basis, the Applicant considers that abnormal load movements can be undertaken in a managed manner such that risks to adjacent structures are appropriately controlled. AIL loads will be limited in number and confined to the existing carriageway located c.20m from the Church. It is considered highly unlikely, given the measures outlined above and the distance of the asset from the carriageway, which does not currently have any weight or traffic restrictions, that the church will receive any negative impacts from the movement of AIL loads. As presented in **ES Volume 1, Chapter 11: Noise and Vibration [APP-049]**, based on guidance provided in British Standards BS5228-2 and BS7385-2, as well as the Design Manual for Roads and Bridges (DMRB) LA 111, construction traffic vibration is unlikely to be of sufficient magnitude to result in adverse impacts on people. Risk of any damage (even cosmetic damage) to any buildings or other structures, starts to occur at levels much higher than those that are perceptible to people. As such, no vibration adverse impacts are expected and are scoped out from the EIA assessment. Extensive work was carried out by the Transport and Road Research Laboratory (TRRL Research Report 246, Traffic induced vibration in buildings) that showed the levels of vibration caused by road traffic, even passing very close to historic buildings and on uneven surfaces, do not present a damage risk.
SHPC-02	St. Helen's Church Skipwith Parochial Church Council	Cultural heritage	The area is of interest due to the heritage surrounding this Anglo-Saxon building with ongoing archaeological exploration.	Works in the vicinity of St Helen's church are limited to the temporary removal of street furniture and vegetation management. No impacts are anticipated on the church or buried archaeological remains.
SHPC-03	St. Helen's Church Skipwith Parochial Church Council	Transport and access	Such disturbance by vehicles in this tranquil village is unwarranted and unnecessary. It appears there are other routes which would be suitable avoiding the village altogether.	**ES Volume 1, Chapter 14: Traffic and Movement [APP-052]**, Table 14-6 notes in response to consultation comments from Skipwith Parish Council that an **Outline Construction Traffic Management Plan (oCTMP) [APP-201]** has been prepared to identify the routes that should be used by construction traffic. An access route, located off Skipwith Road and north of Main Street, has been identified to minimise movements through the village. This route will be used by the majority of construction vehicles. Skipwith Main Street will only be used for movement of Abnormal Loads. The routing of Abnormal Indivisible Loads has been determined through a detailed Abnormal Load Report (Annex C of the **Transport Assessment (TA) [APP-178]**), which considers highway geometry, junction layouts and structural constraints, and identifies the routes that are capable of safely accommodating these vehicles. Due to their size and manoeuvring requirements, suitable routes are limited and Skipwith Main Street provides the only viable option for this Cable Route Corridor access. These movements will be subject to a controlled permitting process and coordinated with the relevant highway authorities, including advance notification and traffic management where required, to ensure they are undertaken safely and with minimal disruption.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				To accommodate Abnormal Loads, the authorised works on Main Street will be temporary (see Schedule 5 to the **Draft Development Consent Order (DCO) [APP-017]**, 'Alteration of Streets', Part 2 'Temporary Alteration of Layout', and shown on the **Streets Plans [AS-007]**, Sheet 4 of 22). No other works activities are proposed in Skipwith Village.
SHPC-04	St. Helen's Church Skipwith Parochial Church Council	Transport and access/Construction	The weight of this vehicle could disturb the water mains, which have had numerous problems recently. There have been sink holes along the edge of the road. Has LVS engaged structural engineers to assess the risk of further road verge collapses.	The Applicant notes the concern regarding buried utilities and localised ground conditions. Abnormal load movements are subject to a controlled permitting process, requiring engagement with highway authorities and, where necessary, asset owners to ensure that routes are suitable for the proposed vehicles, focussed primarily on dealing with the implications of size rather than weight (as the weight of AILs is spread across axles/wheels to reduce the impact of any one point). As part of this process, route assessments consider bridge structures and other infrastructure constraints, and any required measures or restrictions are identified prior to movement. Where localised constraints are identified, appropriate mitigation measures would be implemented, which may include temporary highway measures, traffic management or route adjustments, subject to agreement with the relevant authorities. The Applicant also notes that any sections of highway used by construction traffic or abnormal load movements would be returned to their original condition, or as agreed with the relevant highway authority, following completion of the works. On this basis, the Applicant considers that risks associated with abnormal load movements can be appropriately managed through established processes and controls. The Abnormal Indivisible Load assessment (included in **ES Volume 3, Appendix 14.1: Transport Assessment (TA) [APP-178]**) considers the suitability of roads for abnormal indivisible loads.
Sherburn Aero Club				
SAC-01	Sherburn Aero Club	Glint and glare	Having assessed the glint and glare assessment produced by Pager Power, it is already clear that yellow glare is predicated for all runway operations at Sherburn Aerodrome. Such phenomena has the potential to cause temporary visual disturbance to aviation receptors including pilots which in the case of Sherburn Aerodrome, include students and low hours pilots who rely on sight to 'see and avoid' other airspace users. (aircraft are not separated by air traffic control in the airspace associated with Sherburn Aerodrome)	The Applicant acknowledges these comments. The Glint and Glare Assessment predicted significant impacts from south-facing and tracking panels on aviation activity at Sherburn-in-Elmet. This impact is identified based on the results of the modelling, which provides a basic understanding of the potential for reflections. The results need to be considered qualitatively to understand how the modelled results occur in practice. The **Empirical Study** (**ES Volume 3, Appendix 16.4: Glint and Glare Assessment [APP-186]**) confirms that the impact predicted by the Glint and Glare modelling does not occur in practice. The modelled results for the Proposed Development are comparable with the results of the model for the airfields identified in the Empirical Study for which real-world experiences of pilots are available. On this basis, the Applicant has determined that specific mitigation measures for those airfields are not required. Given that position in respect of Sherburn-in-Elmet and Burn Airfields, and the conclusions in respect of the other airfields set out in Table 16-4, no significant effects are assessed to arise to airfield users from the Proposed Development.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				The Applicant is continuing to engage with the airfield on this subject.
SAC-02	Sherburn Aero Club	Aviation	In addition to glint and glare related concerns, the extent of the Proposed Development is highly likely to produce significant thermal energy which, owing to the location will radiate upwards and into air bourn circuit, potentially causing problematic turbulence.	The Applicant agrees that ground-mounted solar arrays have the potential to produce low-level wind turbulence through thermal updraughts when solar panels are heated by the Sun; there is however no evidence of this negatively impacting general aviation pilots. Solar panels are designed to absorb energy from the Sun and typically operate most efficiently at around 25°C; they are designed to remain cool in direct sunlight, and it is not anticipated that panels would reach temperatures significantly greater than the surrounding ground. Thermal updraughts from solar PV are expected to be comparable to that already experienced by pilots from natural and manmade heat sinks (such as areas of asphalt/tarmac), which pilots are routinely trained to manage.
SAC-03	Sherburn Aero Club	Aviation	These matters represent aviation safety considerations and shall require greater assessment and scrutiny.	Please refer to the response to comment SAC-01, confirming that glint and glare does not present a safety risk to Sherburn Aerodrome.
Ramblers Association York Group				
RAYG-01	Ramblers Association York Group	Socioeconomics, Tourism and Recreation	We are concerned with the effect on Public Rights Of Way and the environment. Some of the existing PROWs could be reasonably be diverted, rather than closed,	Existing Public Rights of Way are not being permanently closed, and any temporary closures will include diversions wherever practicable. These temporary closures will only be taking place during the construction phase of the Proposed Development. The **Outline Public Rights of Way Management Plan (oPROWMP) [APP-199]** sets out information about the proposed changes to Public Rights of Way (PRoW). This confirms diversions will be managed and PRoWs and kept open as far as practicable. The Applicant will take all reasonable steps to minimise disruption across the PRoW network and will adhere to the established hierarchy of actions including: use of signage; implementation of short, temporary closures during the construction phase where local works might affect safety of users; and closure/extinguishment of a PROW following the early implementation of an alternative/new route.
RAYG-02	Ramblers Association York Group	Socioeconomics, Tourism and Recreation	Some of the proposed permissive PROW routes should be considered to be PROW Creations, rather than replacing 'temporary' Closures - this would ensure they are shown on Ordnance Survey maps available to the public - we do not consider 60 years to be suitable for 'temporary' closures.	Section 4 of the **Outline Public Rights of Way Management Plan (oPROWMP) [APP-199]** sets out information about the proposed Permissive Paths implemented alongside the Proposed Development during the construction phase. It provides references for all routes that would be affected and describes the impacts. Any diversions will be managed and PRoWs kept open as far as practicable. The Applicant will take all reasonable steps to minimise disruption across the PRoW network and will adhere to the established hierarchy of actions including: use of signage; implementation of short, temporary closures (construction phase) where local works might affect safety of users; and closure/extinguishment of a PROW following the early implementation of an alternative/new route. The proposed permissive paths are additional to the existing Public Rights of Way (PRoW) network. These are presented in the **Outline Environmental Masterplans (OEM) [PDA-003 to PDA-010]**. The Permissive Paths are being provided in addition to current PRoW, and no PRoW will be closed for the lifetime of the project – closures are limited to the construction phase only. Some of the proposed Permissive Paths take the routes of proposed PRoW within the

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				DMMOs and will be kept open throughout the lifetime of the Proposed Development.
RAYG-03	Ramblers Association York Group	Agricultural Land and Soils	We object to top grade agricultural land being used for PV panels etc.	The Applicant notes this comment. Site selection is addressed in **ES Volume 1, Chapter 3: Alternatives and Design Iteration [APP-041]** and **ES Volume 3, Appendix 3.1: Site Selection Assessment Report (SSAR) [AS-019]**. The SSAR explains how brownfield land, industrial land, previously developed land, and low-grade agricultural land were considered through the site selection process. As set out in **ES Volume 3, Appendix 3.1: Site Selection Assessment Report (SSAR) [AS-019]** the Applicant reviewed available brownfield land within 25km of the POC at Monk Fryston Substation. The assessment concluded that there were no sites within the search area of sufficient size to accommodate a large-scale solar development, either individually or cumulatively. An assessment of the potential effects of the Proposed Development on soils and agricultural land is provided in **ES Volume 1, Chapter 5: Agricultural Land and Soils [APP-043]**. The 486 ha of BMV land within the Proposed Development (of which approximately 19.1 ha would be required for the permanent elements of the Proposed Development involving soil sealing) would represent approximately 1% of the likely BMV land in Selby District and 0.08% of the likely BMV land in the Yorkshire and Humber Region.
RAYG-04	Ramblers Association York Group	Agricultural Land and Soils	Dependant on the designs, it appears some of the fields could be used for livestock for parts of the year, such as over-wintering sheep in the lowlands before/after moving them from their summer pastures on the hills.	**ES Volume 1, Chapter 2: The Proposed Development [APP-040]** notes that for the purposes of assessment and reporting of effects, as a reasonable worst case it is assumed that vegetation will be managed with machinery and there will be no grazing at the Solar PV Sites during the operation and maintenance phase. However, should consent be granted, grazing by sheep will be explored, noting that there are no known landowner restrictive covenants or other reasons that would prevent such use.
RAYG-05	Ramblers Association York Group	Landscape and visual	Some additional landscape mediation is needed to enable the public to enjoy the remaining open country.	The Applicant has embedded mitigation measures to maintain the amenity of Public Rights of Way, including the provision of landscaping and a minimum 15 metre buffer offset from all infrastructure, including fencing; these measures are set out in **ES Volume 1, Chapter 13: Socioeconomics [APP-051]** as well as the provision of new permissive paths. The design of the Proposed Development has been informed by an environmentally led approach. This has included site selection, iterative layout refinement, appropriate offsets from sensitive receptors, and the retention of existing landscape features such as hedgerows, trees and woodland where practicable. These embedded mitigation measures are described in Section 10.8 of **ES Volume 1, Chapter 10: Landscape and Visual [APP-048]**. Mitigation measures include substantial new planting, including approximately 500 trees and 35 km of hedgerow, reinforcement of existing vegetation, careful siting of infrastructure, and minimisation of lighting to avoid unnecessary urbanising effects. While landscape mitigation takes time to establish, the LVIA demonstrates that by Year 15 of operation, once planting has matured, the

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				majority of landscape and visual effects would reduce to minor or non-significant levels. Mitigation measures are shown on the **Outline Environmental Masterplans (OEM) [PDA-003 to PDA-010]** and are secured via the **Works Plans [AS-004], Outline Landscape and Ecological Management Plan (oLEMP) [APP-195], and the Design Parameters and Commitments document [APP-217].** In addition, the Applicant's **Biodiversity Net Gain (BNG) Report [APP-220]** sets out that Light Valley Solar is likely to deliver a biodiversity gain of approximately 70% BNG, including 78.58% for habitats, 73% for hedgerows and 10.42% for watercourses, based on current design proposals.
ERASE East Riding Against Solar Expansion				
ERA-01	ERASE East Riding Against Solar Expansion	Agricultural Land and Soils	We support the aims of net zero but are opposed to mega developments on agricultural land.	The Proposed Development has been designed to maximise the deliver the greatest possible energy generation benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects. As per the description set out in **ES Volume 1, Chapter 2: The Proposed Development [APP-040]**, the total area within the DCO Order Limits encompasses approximately 1,270 hectares (ha). Of this, the 'Solar Development Sites' comprise approximately 900 ha of land. Around 680 ha of this land is proposed as being required for installation of solar PV panels and associated infrastructure. The remaining 220 ha would provide areas dedicated to ecological mitigation, measurable Biodiversity Net Gain (BNG) delivery, landscaping, offsets and agricultural land managed for environmental enhancement and habitat creation. The Applicant remains committed to delivering a Proposed Development that makes a meaningful contribution to the UK's transition to net zero, while also seeking to minimise adverse impacts and maximise opportunities for environmental enhancement and community benefits. An assessment of the potential effects of the Proposed Development on soils and agricultural land is provided in **ES Volume 1, Chapter 5: Agricultural Land and Soils [APP-043]**. This chapter considers baseline agricultural land quality, including Best and Most Versatile (BMV) land, and assesses likely significant effects arising from construction, operation and decommissioning of the Proposed Development, together with embedded mitigation measures. The Applicant has had regard to agricultural land quality and relevant policy protections (as detailed in Sections 4.2 and 4.3 of **ES Volume 3, Appendix 3.1: Site Selection Assessment Report (SSAR) [AS-019]**) in the design and site selection process and has sought, where practicable, to locate infrastructure on lower quality land. Remediation of compaction and any other effects resulting from soil sealing would be included in the soil management measures for the decommissioning phase, as secured in the **Outline Decommissioning Environmental Management Plan (oDEMP) [APP-194]**.
ERA-02	ERASE East Riding Against Solar Expansion	Landscape and visual	This project will have an enormous impact on a rural landscape. The scale represents the virtual industrialisation of the area.	The Applicant makes note of this comment. A detailed Landscape and Visual Impact Assessment (LVIA) has been

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				undertaken and is reported in **ES Volume 1, Chapter 10: Landscape and Visual [APP-048].** The Applicant acknowledges that the Proposed Development would introduce changes to the character of parts of the landscape and to some views. However, the LVIA concludes that, with embedded and additional mitigation, the resulting effects would be localised, reversible and would reduce over time. This approach is consistent with paragraph 5.10.5 of the Overarching National Policy Statement for Energy (NPS EN 1), which recognises that "*virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape*," while also acknowledging that beneficial landscape character effects may arise through mitigation.
ERA-03	ERASE East Riding Against Solar Expansion	Agricultural Land and Soils	There are a range of alternative brownfields sites such as numerous airfields in the area.	Site selection is addressed in **ES Volume 1, Chapter 3: Alternatives and Design Iteration [APP-041]** and **ES Volume 3, Appendix 3.1: Site Selection Assessment Report (SSAR) [AS-019]**. The SSAR explains how brownfield land, industrial land, previously developed land, and low-grade agricultural land were considered through the site selection process. As set out in **ES Volume 3, Appendix 3.1: Site Selection Assessment Report (SSAR) [AS-019]** the Applicant reviewed available brownfield land within 25km of the POC at Monk Fryston Substation. The assessment concluded that there were no sites within the search area of sufficient size to accommodate a large-scale solar development, either individually or cumulatively. The sites assessed were too small to support the Proposed Development and were largely allocated for housing or mixed-use development, in line with local planning policies, thereby creating a conflict with the intended use for renewable energy infrastructure. Therefore, it was concluded that there was no available or suitable brownfield land for the purposes of the Proposed Development.
ERA-04	ERASE East Riding Against Solar Expansion	Battery safety	We have grave concerns regarding safety and BESS construction	The Applicant makes note of this comment. An **Outline Battery Safety Management Plan (oBSMP) [APP-196]** has been produced which sets outs the key fire safety provisions for the Battery Energy Storage System (BESS) proposed to be installed as part of the Proposed Development including safe BESS construction. The implementation of the oBSMP is secured through a Requirement in Schedule 2 of the **Draft Development Consent Order (DCO) [APP-017]**. The oBSMP demonstrates that safety will be inherent in the overall design, minimising the risk of a BESS failure event occurring, and reducing the impact of such an event should it occur.
ERA-05	ERASE East Riding Against Solar Expansion	Biodiversity and Ecology	We fear that wildlife will be adversely impacted.	Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 6: Biodiversity [APP-044]** and **ES Volume 1, Chapter 12: Ornithology [APP-050]**. The Applicant has followed a robust environmentally led design process taking account of the mitigation hierarchy. This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the Proposed Development. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				As concluded in **ES Volume 1, Chapter 6: Biodiversity [APP-044]** and **ES Volume 1, Chapter 12: Ornithology [APP-050]**, there will be no significant effects from the Proposed Development on biodiversity and ecology. It is expected that the Proposed Development will have a gain of approximately 70% Habitat BNG, including 78.58% for habitats, 73% for hedgerows, and 10.42% for watercourses based on the current development proposals. Full details of the gain are set out in the **Biodiversity Net Gain (BNG) Report [APP-220]**.
ERA-06	ERASE East Riding Against Solar Expansion	Noise and vibration	We are concerned regarding noise pollution in the area	The assessment of construction noise and vibration is undertaken in accordance with the methodologies outlined in Section 11.5 of **ES Volume 1, Chapter 11: Noise and Vibration [APP-049]**. The assessment references British Standard BS 5228:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites - Noise (Part 1) and Vibration (Part 2). Details of the assessment including plant equipment assumptions and predicted construction noise levels are presented in **ES Volume 3, Appendix 11.2: Construction Noise and Vibration Assumptions and Results [APP-172]**. The assessment, which includes noise emissions from horizontal directional drilling and piling, concludes that there will be no significant adverse effects from construction noise and vibration, following the application of best practicable measures mitigation approaches.
ERA-07	ERASE East Riding Against Solar Expansion	Landscape and visual	We are concerned regarding light pollution in an area known for its dark skies.	As set out in **ES Volume 1, Chapter 10 Landscape and Visual Impacts [APP-048]**, with reference to England's Light Pollution and Dark Skies map published by CPRE: 'The Countryside Charity', the Site and surrounding area is influenced by some lighting sources and no part of the area is considered to fall within the darkest night time sky category. The lighting within the Proposed Development follows best practice. As set out in **ES Volume 1, Chapter 2: The Proposed Development [APP-040]**, it is not anticipated that the Proposed Development would be lit. the exception to this is the BESS and substations where movement sensory triggered lighting will be needed.
Group Cadw Tir Môn				
GCTM-01	Group Cadw Tir Môn	Landscape and visual	Landscape & Visual Impact- the solar panels will change the character and the landscape so dramatically the view will be unrecognisable.	A detailed Landscape and Visual Impact Assessment (LVIA) has been undertaken and is reported in **ES Volume 1, Chapter 10: Landscape and Visual [APP-048]**. The LVIA assesses the likely significant effects of the Proposed Development on both landscape character and visual amenity during construction, operation and decommissioning, in accordance with the relevant legislation, policy, standards and guidance set out in **Chapter 10, Section 10.3 [APP-048]**. The design of the Proposed Development has been informed by an environmentally led approach, with landscape and visual considerations

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				embedded from the outset. This has included site selection, iterative layout refinement, appropriate offsets from sensitive receptors, and the retention of existing landscape features such as hedgerows, trees and woodland where practicable. These embedded mitigation measures are described in **Chapter 10, Section 10.8 [APP-048]**. Mitigation measures include substantial new planting, reinforcement of existing vegetation, careful siting of infrastructure, and minimisation of lighting to avoid unnecessary urbanising effects. While landscape mitigation takes time to establish, the LVIA demonstrates that by Year 15 of operation, once planting has matured, the majority of landscape and visual effects would reduce to minor or non-significant levels. Mitigation measures are shown on the **Outline Environmental Masterplans (OEM) [PDA-003 to PDA-010]** and are secured via the **Works Plans [AS-004]**, **Outline Landscape and Ecological Management Plan (oLEMP) [APP-195]**, and the **Design Parameters and Commitments document [APP-217]**. Further mitigation measures relating to construction and decommissioning are set out in Chapter 10, Section 10.10, and will be secured via the **Outline Construction Environmental Management Plan (oCEMP) [APP-192]** and the **Outline Decommissioning Environmental Management Plan (oDEMP) [APP-194]**, respectively. The Applicant acknowledges that the Proposed Development would introduce changes to the character of parts of the landscape and to some views. However, the LVIA concludes that, with embedded and additional mitigation, the resulting effects would be localised, reversible and would reduce over time. This approach is consistent with paragraph 5.10.5 of the Overarching National Policy Statement for Energy (NPS EN 1), which recognises that *"virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape,"* while also acknowledging that beneficial landscape character effects may arise through mitigation. ES Chapter 10, paragraph 10.8.3 further explains how the LVIA has been central to achieving the criteria for good design set out in NPS EN-1 and the Planning Inspectorate's NSIP Advice on Good Design (2024), and that this has been a key consideration from the outset. As explained in Sections 3.5 and 3.6 of the **Design Approach Document (DAD) [APP-216],** the design of the Proposed Development has taken account of landscape and visual considerations. At the end of the Proposed Development's operational life, a Decommissioning Environmental Management Plan, in substantial accordance with the **Outline Decommissioning Environmental Management Plan (oDEMP) [APP-194]** will be implemented for decommissioning works. This will provide for the removal of infrastructure and the restoration of the land to its former use, however, it is noted that at that point the Applicant cannot dictate what will happen to the land post-decommissioning when the Applicant no longer has an interest in the land.
GCTM-02	Group Cadw Tir Môn	Glint and glare	The glare of the panels will be seen for miles around.	The Applicant acknowledges these comments. As part of the Application, the Applicant submitted a **Glint and Glare Assessment (ES Volume 3, Appendix 16.4) [APP-186]**, where the Applicant considered the impact of the Proposed

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				Development from a glint and glare including impacts on residential properties, and this is discussed further in **ES Volume 1, Chapter 16: Other Environmental Matters [APP-054]**. Temporary significant impacts were predicted for some roads, rail routes, and dwellings. However, with mitigation in the form of advanced planting, which has been secured in the **Outline Landscape and Ecological Management Plan (oLEMP) [APP-195]**, these effects would be reduced to not significant. The detailed LEMP must be approved by the relevant planning authority, in accordance with Requirement 6 in Schedule 2 to the **Draft Development Consent Order (DCO) [APP-017]**.
GCTM-03	Group Cadw Tir Môn	Agricultural Land and Soils	Agricultural Land 98% of the proposed land is good-quality farmland and must be preserved for food security.	The areas of each Agricultural Land Classification (ALC) grade affected by the Proposed Development are set out in **ES Volume 3, Appendix 5.1: Agricultural Land Classification [APP-150]**. Of the agricultural land within the Solar PV Development Sites, approximately 307 ha (34%) is confirmed as Subgrade 3a, while approximately 179.4 ha (20%) is confirmed as Grades 1 and 2. The distribution of ALC grades is shown in **ES Volume 2, Figure 5.2: Agricultural Land Classification [APP-071]**. The 486 ha of BMV land within the Proposed Development (of which approximately 19.1 ha would be required for the permanent elements of the Proposed Development involving soil sealing) would represent approximately 1% of the likely BMV land in Selby District and 0.08% of the likely BMV land in the Yorkshire and Humber Region. The Applicant does not consider that food security will be compromised by the Proposed Development (or solar energy more widely), particularly in the context that the 486 ha of BMV land within the Proposed Development would represent approximately 1% of the likely BMV land in Selby District and 0.08% of the likely BMV land in the Yorkshire and Humber Region. It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the NPPF. Further, the Government's UK Solar Roadmap (2024) (Ref 27) states that solar development is not considered to compromise food security, and that climate change itself poses the greatest long-term risk to food production - a risk which the Proposed Development directly helps to address by providing a secure, low-carbon source of electricity. Government led agricultural initiatives, such as the Sustainable Farming Incentive which is relaunching later in 2026, have prioritised soil health, environmental enhancement and climate resilience, recognising that long term food security is influenced by a range of factors beyond land take alone, including soil condition, climate change and environmental pressures.
GCTM-04	Group Cadw Tir Môn	The Proposed Development and DCO Process	There is too much solar on the National grid to the extent solar farms are being switched off. There is no need for this solar farm.	NPS EN-1 (December 2025) states that the Secretary of State should assess all applications for development consent for the types of infrastructure included by the NPS (including solar) on the basis that there is demonstrated urgent need for them, that substantial weight should be given to this need, and that the Secretary of State is not required to consider the specific contribution of any individual

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				project to be satisfied that need is established (Paragraphs 3.2.8 to 3.2.10). National Policy Statement for Energy EN-3 (December 2025) states that the UK has huge potential for solar power and that solar energy is at the heart of the Clean Power 2030 Mission (Paras 2.10.1 & 2.10.2). The Government has established capacity ranges for all low-carbon technologies (see Table 1 of the **Statement of Need [APP-214]**) demonstrating that it is the Government's policy to encourage an increase in the capacity of solar power connected to the UK's energy system. The Proposed Development goes towards achieving the Government's capacity range for large-scale solar projects. The Battery Energy Storage System (BESS) which is included as associated development would allow energy generated by the solar panels to be stored such that it could be exported to the grid to contribute to meeting consumer needs during higher demand periods and reducing the potential for output from the Proposed Development to be wasted. The Proposed Development is also located away from areas of the National Electricity Transmission System which are currently experiencing flow constraints and generation curtailment, as described in Section 9.4 of the **Statement of Need [APP-214]**. This is a key benefit of the Proposed Development's proposed location.
Keir Mather MP				
MPKM-01	Keir Mather MP	Agricultural Land and Soils	I have concerns about the project's scale, spanning 2,500 acres, with much of the designated land classified as the best and most versatile agricultural land for food production.	As per the description set out in **ES Volume 1, Chapter 2: The Proposed Development [APP-040]** the total area within the DCO Order Limits encompasses approximately 1,270 hectares (ha). Of this, the 'Solar Development Sites' comprise approximately 900 ha of land. Around 680 ha of this land is proposed as being required for installation of solar PV panels and associated infrastructure. The remaining 220 ha would provide areas dedicated to ecological mitigation, measurable Biodiversity Net Gain (BNG) delivery, landscaping, offsets and agricultural land managed for environmental enhancement and habitat creation. The effects of the Proposed Development on agricultural land, including land quality and productivity, are assessed in **ES Volume 1, Chapter 5: Agricultural Land and Soils [APP-043]**, which states that food security has been considered. The Applicant does not consider that food security will be compromised by the Proposed Development (or solar energy more widely), particularly in the context that the 486 ha of BMV land within the Proposed Development (of which/ approximately 19.1 ha would be required for the permanent elements of the Proposed Development involving soil sealing) would represent approximately 1% of the likely BMV land in Selby District and 0.08% of the likely BMV land in the Yorkshire and Humber Region. It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the NPPF. Further, the Government's UK Solar Roadmap (2024) states that solar development is not considered to compromise food security, and that climate change itself poses the greatest long-term risk to food production - a risk which the Proposed Development directly helps to address by providing a secure, low-carbon source of electricity.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				Government led agricultural initiatives, such as the Sustainable Farming Incentive which is relaunching later in 2026, have prioritised soil health, environmental enhancement and climate resilience, recognising that long term food security is influenced by a range of factors beyond land take alone, including soil condition, climate change and environmental pressures. The Proposed Development allows soils to remain in situ and undisturbed during operation, supporting soil recovery and long term land health, with land reinstated and returned to agricultural use as far as practicable following decommissioning. No permanent loss of agricultural land is anticipated.
MPKM-02	Keir Mather MP	Biodiversity and Ecology	I have concerns about the impact on wildlife and habitats.	Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 6: Biodiversity [APP-044]** and **ES Volume 1, Chapter 12: Ornithology [APP-050]**. The Applicant has followed a robust environmentally led design process taking account of the mitigation hierarchy. This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the Proposed Development. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. As concluded in **ES Volume 1, Chapter 6: Biodiversity [APP-044]** and **ES Volume 1, Chapter 12: Ornithology [APP-050]**, there will be no significant effects from the Proposed Development on biodiversity and ecology. It is expected that the Proposed Development will have a gain of approximately 70% Habitat BNG, including 78.58% for habitats, 73% for hedgerows, and 10.42% for watercourses based on the current development proposals. Full details of the gain are set out in the **Biodiversity Net Gain (BNG) Report [APP-220]**.
MPKM-03	Keir Mather MP	Transport and access	I have concerns about the disruption throughout the development process, including impacts on local roads and infrastructure.	The Applicant notes this comment. A **Transport Assessment (TA) [APP-178]** has been prepared, which assesses the impact of the Proposed Development on the transport network during the construction, operation and decommissioning phases. The TA outlines the expected traffic movements from the Proposed Development and measures that will be put in place to manage any potential transport impacts. The **TA [APP-178]** concludes that there will be some transport impacts due to increased vehicle movements, particularly at the construction phase with a number of Heavy Goods vehicle (HGV), Abnormal Invisible Load (AIL) and construction worker movements forecast. However, an **Outline Construction Traffic Management Plan (oCTMP, [APP-201])** has been prepared which identifies the routes that should be used by construction traffic. The oCTMP also includes measures to minimise any impacts during construction by reducing HGV movements during the peak hours and managing employee movements. There are not expected to be any long-term significant impacts on the transport network.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				These routes take into account the existing condition of the roads and seek, where practicable, to avoid residential areas. The TA shows that the majority of routes within the assessed study area (36 of 43) have an average percentage change in traffic flows, as a result of the Proposed Development, of less than 10%, which is reasonably assumed to be within the expected range of daily fluctuation and would go unnoticed to the majority of other road users. Overall, it is considered that any temporary impacts from the Proposed Development can be managed through the CTMP, and there are not expected to be any long-term significant impacts on the transport network.
MPKM-04	Keir Mather MP	Water Resources and Flood Risk	I have concerns about the cabling corridor and its potential to interfere with flood defences and field drainage.	**ES Volume 3, Appendix 15.1: Flood Risk Assessment (FRA) [APP-179]** includes an assessment of interactions between flood defences and the Cable Route Corridor in Annex H, with reference to **ES Volume 2, Figure 15.14: Spatial Flood Defences [APP-128]**. Cable Route Corridor 1-4 is shown to cross existing flood defences on the River Ouse. However, with the implementation of standard best-practice measures during construction, including monitoring and adherence to relevant environmental standards and obtaining the necessary environmental permits, it is concluded that the proposed works can be completed without compromising the integrity or functionality of existing flood defence assets. The **Outline Construction Environmental Management Plan (oCEMP) [APP-192]** commits to consultation with affected landowners to investigate the current extent of land drainage. Where necessary, pre-construction land drainage will be explored with the aim of maintaining the efficiency of the existing drainage system and the integrity of the working areas during construction. Any land drains temporarily disturbed or damaged during construction would be reinstated, diverted, or otherwise made good to their original condition upon completion of the works to ensure that existing surface water and land drainage arrangements are maintained post-construction.
British Horse Society				
BHS-01	British Horse Society	Socioeconomics, Tourism and Recreation	we responded to the initial consultation we asked specifically, that the rights of way be differentiated on all plans and proposals this has not happened, there is a difference between a footpath and a bridleway, simply showing all public rights of way in the same manner makes it difficult to see how the proposal will affect local horse riders. Any useful contribution by horse riders then becomes difficult.	The **Public Rights of Way Plans [AS-005]** show footpaths as orange lines and bridleways as green lines. The **Works Plans [AS-004]** show where permissive paths will be provided, with Work No. 10C, in pink and white, able to be used by horse riders.
BHS-02	British Horse Society	Socioeconomics, Tourism and Recreation	Opportunities should be taken to upgrade footpaths to bridleways and create new bridleways which will benefit a greater number of the public such as pedestrians, cyclists and horse riders.	The Proposed Development includes the provision of approximately 8 km (5 miles) of new permissive paths (as shown on the **Works Plans [AS-004]**). Work No. 10C, in pink and white, shows the permissive paths that may be used by pedestrians, cyclists and horse riders. The **Outline Environmental Masterplans (OEM) [PDA-003 to PDA-010]** outline which users can use each of the proposed permissive paths.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				The design of the permissive paths reflects the status of the routes that they connect to and therefore cater for horse riders where appropriate.
BHS-03	British Horse Society	Socioeconomics, Tourism and Recreation	Bridleway in Parish: Sel-Escrick route code 35.28/1/1 within site 1. Disappointingly simply shown as a Public right of way in the Light Valley Solar Consultation pack.	Route 35.28/1/1 within Site 1 is correctly identified as a Bridleway in Table 13-21 in the **ES Volume 1, Chapter 13: Socioeconomics [APP-051]**. The **Public Rights of Way Plans [AS-005]** show the public rights of way within and near to the Proposed Development, colour coded to illustrate footpaths and bridleways.
BHS-04	British Horse Society	Socioeconomics, Tourism and Recreation	Public footpath recorded as Parish Sel-Escrick Route Code: 35.28/3/1 Named as Potters lane on historical maps we asked that this footpath be upgraded to bridleway as part of the development.	The connection will not be upgraded to a bridleway following discussions with the landowner. However as identified in the **oPROWMP [APP-199]**, a 900m section of route 35.28/3/1 is being diverted to provide improved connectivity by connecting it to the existing bridleway 36.67/6/1.
BHS-05	British Horse Society	Socioeconomics, Tourism and Recreation	Targeted Consultation Information Change Note, October 2025 Page 1 Permissive Paths "to create publicly accessible routes within the Solar Development Sites for walking and cycling" Any permissive paths should include horse riders.	As noted in **ES Volume 1, Chapter 13: Socioeconomics [APP-051]** Table 13-7, the Applicant confirms that permissive paths will reflect the status of the routes they connect, ensuring access for horse riders where appropriate. This approach supports non-motorised users and aligns with national policy. Permissive paths for use by pedestrians, cyclists and horse riders are shown as Work No. 10C on the **Works Plans [AS-004]**.
BHS-06	British Horse Society	Socioeconomics, Tourism and Recreation	Page 5.3 "The boundary of the Proposed Development has been amended to ensure that there is enough space for an internal access route and diversion of an existing bridleway. This is to allow use of existing tracks." NPPF Para 105 is being ignored in this development. Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users. Horse riders have not been considered and included in this development, despite our relevant correspondence which remains unanswered.	Paragraph 105 of the NPPF states that **"***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".* NPS EN-1, Section 5.11, considers potential impacts on land use. EN-1 refers to the impacts of energy on recreation assets and PRoW, as well the opportunity to create new assets. Paragraph 5.11.30 confirms the expectation that mitigation to ensure PRoW, National Trails and coastal access may be kept open wherever possible, and opportunities for new access should be encouraged. Use, character, attractiveness and convenience should be considered when mitigating impacts on PRoW. The **Planning Statement [APP-207]** appraises the Proposed Development in relation to the NPPF and National Planning Statements for Energy. Section 7.14 of the Planning Statement relates to Socioeconomic Impacts. Consistent with EN-1 and NPPF paragraph 105, the Proposed Development will protect and enhance PRoW and access with the inclusion of new permissive paths to improve connectivity, as secured through **Outline Landscape and Ecological Management Plan (oLEMP) [APP-195].** These new routes provide an opportunity to create an enhanced and better-connected network of recreational routes within the local area, adding to the existing PRoW network and providing increased opportunity for recreation in the areas surrounding the Proposed Development. The Applicant confirms that permissive paths will reflect the status of the routes that they connect to ensuring access for horse riders where appropriate. In addition, a number of measures are incorporated including a 15m offset from existing routes as an embedded measure, as well as management throughout the construction phase to ensure that the impacts to PRoW are minimised. Details of the management of PRoW are set out in the **Outline Public Rights of Way Management Plan (oPROWMP) [APP-199]**.

Comment Reference	Representation by	Theme(s)	Comment	Applicant's Response
				The assessment of socioeconomic impacts concludes that there will be no significant impacts on PRoW as a result of the construction of the Proposed Development. Where appropriate, horses riders have been considered in the Environmental Impact Assessment, including **ES Volume 1, Chapter 16: Other Environmental Matters [APP-054]**. As horses may also use bridleways in the vicinity of the Solar Development Sites, guidance produced by the British Horse Society (https://www.bhs.org.uk/media/5f0llz3t/solar-0825.pdf) has been reviewed. It states that, with regard to glint and glare, the incidence of glare or dazzle from solar panels is very low compared with glass and will not be uniform throughout a period of sunlight, assuming that the panel is static. Any reflection is unlikely to be a direct problem to horses, riders or carriage-drivers because of the angles and distances involved. Therefore, no significant impacts are predicted upon horses. The Applicant can confirm that the feedback submitted by the respondent at both the statutory and targeted consultations has been responded to within **Consultation Report Appendix 12: Section 42 Applicant Response Table [APP-037]**.