

Light Valley Solar

08.20 The Applicant's Response to Submissions Received at Deadline 1 – Members of the Public

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The Infrastructure Planning (Examination Procedure) Rules 2010
Rules 8(1)(c)



Light Valley
Solar

Infrastructure Planning

Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010

Light Valley Solar

Deadline 2 Submission

The Applicant's Response to Submissions Received at Deadline 1 - Statutory Bodies

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1 Introduction

1.1 Purpose of the Document

- 1.1.1 This document provides the Applicant’s response to all relevant documents submitted by members of the public at Deadline 1. This includes Written Representations (WRs), comments on the Applicant’s responses to Relevant Representations, and post hearing submissions.
- 1.1.2 The Applicant has submitted separate documents alongside this document responding to other relevant submissions at Deadline 1. These include:
- 08.17 The Applicant’s Response to Local Impact Reports
 - 08.18 The Applicant’s Response to Submissions Received at Deadline 1 – Statutory Bodies
 - 08.19 The Applicant’s Response to Submissions Received at Deadline 1 - Parish Councils and Non-Statutory Organisations
- 1.1.3 Please note that this document does not include a response to Nick Billingham [REP1-048]. As this representation involves a large number of specific questions, the Applicant needs more time to ensure that they are appropriately answered. The Applicant will provide a full response to this representation as soon as possible after Deadline 2.

1.2 Structure of the Report

- 1.2.1 This document 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 submissions. The wider range of acronyms used by the Applicant can be found in the **Contents, Glossary and Abbreviations [APP-038]**.
 - **Table 1.2** sets out the list of parties responded to as part of this document.
 - **Section 2** of this document provides responses to thematic comments submitted by members of the public.
 - **Section 3** of this document provides responses to detailed comments submitted by members of the public.
- 1.2.2 The submissions made by interested parties, as well as 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](#).

Table 1.1: List of Acronyms for Submission Documents

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

Table 1.2 Listed Organisations whose submissions are Responded to in Section 2

Examination Library Reference	Relevant Representation Received From
REP1-030	Andy Cowflatt
REP1-031	Annabel Amy
REP1-032	Annette Exley
REP1-033	Eliot Grant
REP1-034 and REP1-035	Gary Philip Yeadon
REP1-036	George Edward Vincent
REP1-037	Ian Curran
REP1-038	Jenny Britain
REP1-039	Joanne Evans

Examination Library Reference	Relevant Representation Received From
REP1-040	John Nicholas Stoker
REP1-042	Kim Jones
REP1-043	Linda Valerie Wolstenholme
REP1-044	Louise Billingham
REP1-045	Mrs Inga Bune
REP1-046	Ms Susan Joy Tasker
REP1-047	Nichola Tomlinson
REP1-048	Nick Billingham
REP1-049	Peter Wilson
REP1-050	Robert Tams
REP1-051	Stephanie Victoria Crabtree
REP1-052	Stuart Stockdale
REP1-053 and REP1-054	Wendy Tomlinson
REP1-055	Martin Nichols

2 The Applicant’s responses to members of the public – Thematic comments

Reference ID	Comment Reference	Theme	Summary of Issue Raised	Applicant's Response
General Feedback				
REP1-046	T-WR-GEN-01	General Feedback	How can the public or indeed the planning inspectorate assess such a huge area that is the Escrick development with the current lack of detail provided together with the absence of credible ecological and environmental investigations of similar areas of solar panels over an extended period of time?	The Applicant has submitted an Environmental Statement which includes within it robust assessments that have been informed by a detailed consideration of the baseline environment, including in relation to ecology. The Applicant’s approach to the description and assessment of the Proposed Development is in accordance with good practice and utilises the Rochdale Envelope approach. Environmental Statement Volume 1, Chapter 2: The Proposed Development [updated alongside this submission] and the Design Parameters and Commitments [updated alongside this submission] document sets 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. This includes the design parameters for different Solar PV panel options (tracking and fixed panels), including the maximum and minimum clearance, height and separation distance between the rows. 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.
The Proposed Development and DCO Process (Project Description)				
REP1-044; REP1-046; REP1-049	T-WR-DES-01	The Proposed Development and DCO Process (Project Description)	The overall scale, siting and duration of the Proposed Development are considered disproportionate to the rural communities and countryside affected. Respondents characterise the Proposed Development as an industrial rather than genuinely temporary land use and argue that the scale of development on productive agricultural land makes its environmental and community effects difficult to justify or assess safely.	In response to the siting and scale of the Proposed Development, and as per Comment Response LAN-32 within the Applicant’s Response to Relevant Representations (Part 2) [AS-036], Section 4.2 of NPS EN-1 sets out the critical national priority for low carbon infrastructure, to which this application for development consent responds. Paragraph 4.2.34 further notes that it is for each location to maximise its capacity to deliver these aims. In this regard, 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. Paragraph 5.10.26 of NPS EN-1 states that “<i>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.</i>” ES Volume 1, Chapter 3: Alternatives and Design Iteration [updated alongside this submission] explains how the Applicant has evolved the design to respond to the opportunities and constraints presented by the Site as part of an environment-led design

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				approach. This has included establishing minimum offsets, which are set out in the Design Parameters and Commitments document [updated alongside this submission] and explained further in the context of the design vision and design principles in the Design Approach Document (DAD) [APP-216]. The Outline Environmental Masterplans (OEM) [updated alongside this submission] shows the large areas of the Proposed Development which are proposed for multi-functional environmental mitigation and enhancement, where built development is excluded for example to provide habitats, reducing its scale. With regard to changes to the landscape character, as per Comment Response LAN-01 within the Applicant’s Response to Relevant Representations (Part 2) [AS-026], 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 “<i>virtually all nationally significant energy infrastructure projects will impact the landscape</i>”. Paragraph 5.10.13 explains further that “<i>all proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites</i>”. NPS EN-3 provides further policy on solar photovoltaic generation. In paragraph 2.10.19 it notes that “<i>utility-scale solar farms are large sites that may have a significant zone of visual influence.</i>” 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 LVIA concludes that, with embedded and additional mitigation, the resulting effects would be localised, reversible and would 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) [updated alongside this submission] and are secured via the Works Plans [AS-004], Outline Landscape and Ecological Management Plan (oLEMP) [updated alongside this submission], and the Design Parameters and Commitments [updated alongside this submission] document. In regard to the loss of agricultural land, and as per Comment Reference AGR-01 within the Applicant’s Response to Relevant Representations (Part 2) [AS-036], 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 [updated alongside this submission]. The Proposed Development will result in a temporary and reversible loss of agricultural land for the operational life of the Proposed Development. The Proposed Development is temporary, albeit long-term

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				(life 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) [updated alongside this submission] which includes the preparation and implementation of a Soil Resources Management Plan (SRMP) in substantial accordance with the Outline SRMP [updated alongside this submission]. 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 [updated alongside this submission].
REP1-032; REP1-042	T-WR-DES-02	The Proposed Development and DCO Process (Project Description)	The Applicant should provide and keep updated clear information on the land interests affected by compulsory acquisition or temporary possession, the number of binding voluntary agreements (including option/lease agreements), unresolved or unidentified interests, alternatives to compulsory acquisition along the cable route, and the funding/security available for compensation and decommissioning obligations.	The Applicant provides regular updates on negotiations with affected parties through the Land and Rights Negotiation Tracker [updated alongside this submission], including the status of voluntary agreements. Information on unidentified interests is contained within the Book of Reference [updated alongside this submission] for any applicable plots, and details the rights sought in those plots. The Applicant is able to meet their compensation obligations and detail relating to this can be found within the Funding Statement [APP-021]. The Applicant has included a mechanism within the Heads of Terms to compensate any party directly affected by works in relation to the project. The Applicant will continue to update these documents throughout the Examination and as negotiations progress
REP1-032; REP1-033; REP1-046;	T-WR-DES-03	The Proposed Development and DCO Process (Project Description)	Too much design and mitigation detail is considered to remain indicative, optional or deferred until after consent. Respondents seek clearer fixed parameters, including panel design and mitigation commitments, and assurance that the final scheme will remain within the reasonable worst case assessed and will not deliver materially worse environmental outcomes.	The Applicant notes this comment. As per Comment Reference DES-47 in the Applicant’s Response to Relevant Representations (Part 2) [AS-036] , the Environmental Statement (ES) presents a robust assessment of likely significant effects based on the currently available design information, in accordance with the Rochdale Envelope approach. This includes an evaluation of worst-case parameters to ensure that potential impacts are appropriately understood at this stage.

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				Whilst elements of the detailed design including the detailed mitigation and management plans will be progressed post consent, this is consistent with the DCO process and does not prevent a full assessment of likely significant effects. The proposed management and mitigation measures set out in the ES have been informed by environmental assessment and align with national and local planning policy, as detailed in the Planning Statement [updated alongside this submission]. This approach therefore does not rely on mitigation in place of robust environmental assessments as it follows EIA practice, with assessment being undertaken on a worst-case basis and mitigation applied to reduced identified effects, in accordance with planning policy.
REP1-037; REP1-045; REP1-052	T-WR-DES-04	The Proposed Development and DCO Process (Project Description)	The national need case and projected electricity demand should be more clearly justified, including what the electricity will actually be used for, whether demand is driven by data centres, and whether claims about powering homes or reducing household bills are substantiated.	Section 8.4 of the Statement of Need [APP-214] explains that electricity generated by the Proposed Development will be transmitted to the National Electricity Transmission System to power homes, cars, offices, shops, and factories, both locally and nationally. This electricity will help to take carbon-emitting generation off the grid, and to keep it off the grid, while electricity demand increases as a result of the electrification of transport, heat and industrial demand on a pathway to achieving net zero, as explained in Chapter 5 of the Statement of Need [APP-214] . Together with Chapter 10 of the Statement of Need this chapter also provides evidence that increasing the capacity of renewable assets in GB reduces the traded price of power and provides price protection for GB consumers by shielding them from the effects of volatile international energy markets.
REP1-035; REP1-037	T-WR-DES-05	The Proposed Development and DCO Process (Project Description)	Greater transparency is requested over project costs, funding, revenues, project duration and who will ultimately own, operate and monitor the development.	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. The Funding Statement [APP-021] in the Application provides details of the corporate structure of Light Valley Solar Limited and how the Proposed Development is being funded.
Construction and Decommissioning				
REP1-032; REP1-042	T-WR-CON-01	Construction and Decommissioning	The description of the development as temporary is questioned given the 60-year operational period. Respondents seek clarity on who will be legally responsible for full decommissioning and soil restoration, and what financial bond, security or other mechanism will ensure those obligations are met even if ownership or operation changes.	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. As such, relevant topics in the ES have assessed impacts as temporary, but long-term. As per Comment Reference CON-04 in the Applicant's Response to Relevant Representations (Part 2) [AS-036], a requirement to decommission the Proposed Development is part of the Development Consent Order (DCO) and would sit with the owner at the time of decommissioning. Failure to comply with Requirement 19 would be a criminal offence. Decommissioning is also covered in agreements with landowners, which includes decommissioning securities to cover the cost of decommissioning in the event of any breach by the Applicant or in the

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				event of the insolvency of the Applicant. The amount of such decommissioning security is regularly re-valued throughout the lifecycle of the Proposed Development and topped up if necessary. In respect of a general decommissioning bond, the Applicant notes that it is not routine for energy DCOs and while similar arguments have been advanced requesting a decommissioning bond, the Secretary of State has not required in most of the solar DCOs to date. In Cleve Hill, for example, the ExA came to the conclusion that the Applicant intended to follow good commercial practice and set aside funds during the Proposed Development’s lifetime, meaning it was not necessary to require a bond. The ExA further noted that as the enforcement provisions are already rigorous it is not routine for DCOs to impose decommissioning bonds. This was also addressed more recently in the decision for the Mallard Pass DCO where, with the decommissioning requirement in place, the Secretary of State considered there was no need for further controls. The Applicant would also be under an obligation, pursuant to agreements with landowners, to return the land to landowners following decommissioning.
REP1-042	T-WR-CON-02	Construction and Decommissioning	What long-term monitoring of noise, glare and visual impact will be undertaken?	Noise and vibration: As presented in Section in 11.12 Monitoring of the ES Volume 1, Chapter 11: Noise and Vibration [APP-049], for construction noise and vibration, no additional monitoring requirements have been identified beyond the measures presented the Outline Construction Environmental Management Plan [updated alongside this submission] and the Decommissioning Environmental Management Plan [updated alongside this submission]. Moreover, as noted in Section 11.9 of the Noise and Vibration chapter, with regards to operational noise a post-construction verification exercise will be undertaken. This commitment is secured within the Outline Operational Environmental Management Plan [updated alongside this submission] where it notes that the Applicant is committed to “<i>undertake and submit to North Yorkshire Council a verification exercise three months after operations begin for that part of the Proposed Development. This verification exercise will seek to confirm that the conclusions of that noise impact assessment have been borne out.</i>” It then adds a commitment that “<i>if that verification exercise concludes that the conclusions have not been borne out that the Applicant will undertake remedial actions to ensure those conclusions are delivered</i>”. Details of the noise impact assessment including any noise monitoring, will be determined within the detailed OEMP(s). The Outline Operational Environmental Management Plan [updated alongside this submission] also includes measures regarding noise complaints resulting from any operational activities. The relevant measure notes: “<i>record all noise complaints, identify cause(s), take appropriate measures to reduce noise emissions in a timely manner and record the</i>

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				<i>measures taken. Make the complaints log available to the local authority when asked.”</i> For the monitoring requirement of this measure, the Outline Operational Environmental Management Plan [updated alongside this submission] notes that the detailed OEMP(s) will outline a communication strategy to address noise complaints, a transparent investigation protocol and a commitment to take remedial action where required. Landscape and Visual: The ecological mitigation and enhancement proposals, including Biodiversity Net Gain measures, are illustrated on the Outline Environmental Masterplans (OEM) [updated alongside this submission], detailed in the Outline Landscape and Ecological Mitigation Plan (oLEMP) [updated alongside this submission] and the Outline Bird Mitigation Area Management Plan (oBMAMP) [APP-205]. The oLEMP [updated alongside this submission] 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. Glint and Glare: Where advanced mitigation planting is proposed for Glint and Glare, this mitigation is secured through the oLEMP [updated alongside this submission] once implemented, the advanced planting would reduce the predicted effects to not significant. As noted above the oLEMP also sets out requirements for monitoring and replacement planting.
REP1-042; REP1-053	T-WR-CON-03	Construction and Decommissioning	Construction could cause dust, debris, noise, vibration and operational disruption to nearby residents and businesses, and respondents seek effective measures to minimise and manage these effects.	As per Comment Reference CON-01 within the Applicants Response to Relevant Representations (Part 2) [AS-036] , the likely significant effects of the Proposed Development during the construction phase are assessed throughout the ES [APP-038 to APP-190] , including the effects on air quality, noise and vibration and traffic and transport. 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) [updated alongside this submission] and the Outline Construction Traffic Management Plan (oCTMP) [updated alongside this submission] .
REP1-043	T-WR-CON-04	Construction and Decommissioning	Preliminary works and major maintenance or replacement campaigns during the operational life should be assessed and controlled to the same standard as initial construction. Respondents seek clarity on the frequency, duration, HGV movements, waste and local effects of replacement activity and the controls that would apply.	As per Comment Reference CON-06 within the Applicants Response to Relevant Representations (Part 2) [AS-036], the operation and maintenance of the Proposed Development have been assessed throughout the ES, 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 the Outline Operational Environmental Management Plan [updated alongside this submission] (for replacements). In respect of

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				preliminary works, the Applicant has submitted a Permitted Preliminary Works Management Plan at Deadline 2.
Alternatives and Design Iteration, and Site Selection				
REP1-032; REP1-043; REP1-044	T-WR-ALT-01	Alternatives and Design Iteration, and Site Selection	Respondents argue that the Proposed Development comprises multiple constrained parcels and that further site reduction or deletion should be considered where impacts are greatest. The removal of former Site 5 and 40 ha of BMV land from Site 1 is cited as evidence that constraint-led changes are possible; further scaling back, including removal of Sites 6 and/or 7, is requested.	At a site selection level, the Site Selection Assessment Report [AS-019] explains how the Applicant has taken a multistage approach to site selection assessment and has considered 9 potential development areas within a 25 km search area against standardised assessment criteria. The conclusion of the assessment is 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 criteria applied. With regard to design evolution to avoid constrained land parcels within the site for the Proposed Development, the Design Approach Document [APP-216] explains how the design of the Proposed Development has evolved in order to avoid constraints in line with the mitigation hierarchy. This includes removal of Site 5 following more detailed flood analysis, reduction in the Order Limits to avoid archaeology, high quality farmland, flood risk and visual impacts, and removal of Solar PV Panels near residential receptors and built heritage assets, together with removals to account for aviation safety near Sherburn Aerodrome. In terms of the specific reference to Sites 6 and 7, these sites are of a suitable size, located within close proximity to the Point of Connection and Solar Development Sites 2, 3, 4 and 8. Sites 6 and 7 meet multiple Project Objectives including maximising clean energy generation, being deliverable due to willing landowners, optimising grid connection capacity and supporting the on-going agricultural economy of North Yorkshire (Project Objectives 1, 2, 3 and 5). Sites 6 and 7 are relatively unconstrained in planning policy terms falling outside of Green Belt, located within an area at a low risk of flooding from fluvial sources (Flood Zone 1) and predominantly comprising lower grade agricultural land (non-BMV). A proportionate approach must be adopted with respect to alternatives and only alternatives that meet the objectives of the Proposed Development. Sites 6 and 7 are suitable and available for development meeting multiple Project Objectives as set out above and are technically and commercially feasible for the Proposed Development. Table 3-1 of the Site Selection Assessment Report [AS-019] compares the Proposed Development (PDA 8) against other reasonable alternatives (PDA 5, 6, 7 and 9) with respect to policy constraints (Green Belt, Grades

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				1, 2 and 3 agricultural land and flood zones 2 and 3). Whilst this assesses the Proposed Development as a whole, this demonstrates that none of the alternative Potential Development Areas are more suitable alternatives to the Site. In addition, PDA 8 performs the best against the Project Objectives. There are no more suitable or available locations within the search area than the location of the Proposed Development. In addition, there is not a need in policy terms to establish that the proposed project represents the best option. Sites 6 and 7 and the Proposed Development overall is in accordance with relevant planning policy relating to site selection and alternatives set out in NPS EN-1 and NPS EN-3.
REP1-037; REP1-043; REP1-046	T-WR-ALT-02	Alternatives and Design Iteration, and Site Selection	Alternative locations and surfaces for solar generation are said not to have been sufficiently explored, including rooftops, industrial buildings, brownfield land, car parks, railway land, roadsides, canal banks and reservoirs.	The Applicant is supportive of the development of solar schemes at other locations and on other surfaces. Section 7.3 of the Statement of Need [APP-214] provides evidence as to why the Applicant agrees with the Government’s position that such developments are needed as well as, not as an alternative to, the Proposed Development. The Applicant has considered previously developed land including brownfield sites, contaminated land and industrial sites within section 2.5 of the Site Selection Assessment Report [AS-019]. However, none of the sites identified are considered reasonable alternatives for accommodating the Proposed Development. The Applicant has also considered specific alternatives, including specific brownfield sites, raised in consultation responses, as set out in tables 3-1 and 3-2 of ES Volume 1, Chapter 3: Alternatives and Design Iterations [APP-041]. None of the alternatives considered are considered to offer reasonable alternatives to the Proposed Development. As noted above, the Applicant is supportive of rooftop solar, but considers this to be a solution to meeting the UK Government’s Clean Power 2030 Action Plan targets in addition to, not instead of, the Proposed Development.
REP1-037; REP1-046	T-WR-ALT-03	Alternatives and Design Iteration, and Site Selection	Respondents seek greater consideration of alternative energy-generation and demand-reduction approaches, including a different balance of wind and solar, tidal power, nuclear/SMRs, alternative PV technologies and energy-efficiency measures that could reduce the need for large areas of ground-mounted solar.	The Applicant has considered alternative renewable energy technologies in section 3.9 of ES Volume 1, Chapter 3: Alternatives and Design Iteration [updated alongside this submission]. The Applicant is supportive of other energy-generation and demand-reduction approaches. Chapter 6 of the Statement of Need [APP-214] provides evidence as to why the Applicant agrees with the Government’s position that such developments are needed as well as, not as an alternative to, the Proposed Development. With its background in solar installations, the Applicant is best placed to help deliver the Government’s clean power capacity range of 45-47 GW of installed large-scale solar capacity by 2030 through the delivery of solar schemes such as the Proposed Development. The Applicant anticipates that developers with experience other technologies will come forward to support the delivery of the Government’s specific target capacity ranges for other forms of renewable energy (set out

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				in Table 1 of the Statement of Need [APP-214] in addition to, rather than as an alternative to, the Proposed Development.
Green Belt				
REP1-032; REP1-037	T-WR-ALT-04	Green Belt	The Applicant's treatment of affected Green Belt land as Grey Belt is questioned. A parcel-by-parcel assessment is requested showing the area and works affected, performance against each Green Belt purpose, effects on openness and settlement separation, and the local planning authority's position.	As per Comment Reference ALT-01 within the Applicants Response to Relevant Representations (Part 2) [AS-036], policy compliance is considered within Section 7.5 of the Planning Statement [updated alongside this submission], Planning Statement Appendix 2, Grey Belt Assessment [updated alongside this submission] and the Policy Compliance Document [updated alongside this submission]. 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 therefore does not constitute inappropriate development, 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 development (because he considers the land is not 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, including assuming that the very special circumstances test is made out. North Yorkshire Council confirmed that they agreed with the Applicant's approach to grey belt within Issue Specific Hearing 1, as documented within Transcript of Issue Specific Hearing 1 (ISH1) - Part 2 [EV5-005].
Climate Change Resilience and Greenhouse Gas Emissions				
REP1-031; REP1-037	T-WR-CLI-01	Climate Change Resilience and Greenhouse Gas Emissions	The full embodied and lifecycle carbon effects of panel and equipment manufacture, overseas sourcing, shipping, construction and technology choices should be transparent, including the carbon payback period and emissions from equipment such as SF6-containing switchgear.	The Applicant notes concerns raised for carbon impact associated with the materials used to construct the Proposed Development. ES Volume 1, Chapter 9: Greenhouse Gas Emissions [APP-047] assesses the greenhouse gas (GHG) 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] . Section 2 of ES Volume 3, Appendix 9.1: Greenhouse Gas Emissions Assessment [APP-166] provides all construction assumptions used within the GHG emissions assessment.
REP1-037	T-WR-CLI-02	Climate Change Resilience and Greenhouse Gas Emissions	Carbon effects associated with land-use change, reduced domestic food production/imports and biodiversity/landscape measures should be more fully accounted for, with monitoring and carbon-performance commitments through the project lifecycle.	The Applicant notes concerns raised for carbon impact associated with land use change. ES Volume 1, Chapter 9: Greenhouse Gas Emissions [APP-047] assesses the greenhouse gas (GHG) 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] . Section 5 of ES Volume 3, Appendix 9.1:

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				Greenhouse Gas Emissions Assessment [APP-166] provides all land use change assumptions used within the GHG emissions assessment.
Landscape and Visual				
REP1-032; REP1-033; REP1-044	T-WR-LAN-01	Landscape and Visual	Significant visual effects may persist for many years while mitigation establishes, and respondents consider proposed buffers and planting insufficient or uncertain. They seek greater property-specific separation, robust winter/early-year assessment, enforceable planting and management commitments, defined establishment and replacement obligations, and evidence that screening will be effective in the flat rural landscape.	NPS EN-1 paragraph recognises that “<i>all proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites.</i>” Paragraph 5.10.35 goes further, stating that “<i>the scale of energy projects means that they will often be visible across a very wide area</i>” and that the “<i>the Secretary of State should judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project.</i>” The Applicant has carried out a comprehensive, detailed and robust assessment of the likely landscape and visual effects of the Proposed Development has been with reference to established best practice and extensive experience of assessing other solar farm developments in similar contexts. The detailed methodology is set out in ES Volume 3, Appendix 10.1: Landscape and Visual Assessment Methodology [APP-167]. Standards and guidance which have informed the methodology are provided in Table 10-4 of ES Volume 1, Chapter 10: Landscape and Visual [APP-048], explaining how they have been applied in carrying out the LVIA. The Applicant has applied the mitigation hierarchy effectively through site selection to avoid permanent above ground infrastructure within landscapes with high or very high sensitivity. This is consistent with the policy set out in section 5 of NPS EN-1. Best practice guidance establishes that there is a close relationship between the value attached to the landscape and to the value attached to views across the landscape. 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 Applicant has incorporated appropriate minimum setbacks from residential properties, informed by the character of the landscape and the effectiveness of mitigation in the generally flat landscape. This is set out in the Design Parameters and Commitments [updated alongside this submission] document and 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 of 30m from the curtilage of residential properties to the Order Limits. This minimum offset was established following pre-application consultation, EIA scoping, and environmental surveys and assessments, including the LVIA. The layout

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				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. The Applicant’s position is that minimum offsets should be landscape-led. Notwithstanding this, paragraph 5.10.25 of NPS EN-1 invites the Applicant to draw attention to other consented infrastructure projects where similar visual effects have been identified. Consented solar farm NSIPs have taken a range of approaches to residential offsets. For example, West Burton, Tillbridge and Cottam NSIPs have incorporated minimum 50m offsets measured from residential properties. These developments are located in similar, largely flat landscapes where the magnitude of impact and sensitivity of receptors is similar. However, it is important to note that these offsets are measured from residential properties, whereas the medium offsets secured in the DCO for the Proposed Development are measured from the curtilage, which is larger. Therefore, in reality these minimum offsets are similar to existing consented solar farm developments in similar contexts. Imposing larger, arbitrary offsets would not be appropriate or necessary. The avoidance of long term significant adverse residual visual effects demonstrates that the design robustly applies the mitigation hierarchy by siting the Proposed Development on land with low landscape sensitivity, avoiding permanent above ground infrastructure in more sensitive landscapes and views and embedding mitigation which are capable of reducing the majority of residual landscape and visual effects to not significant. A wider offset cannot therefore be justified based on the evidence presented. Mitigation measures are shown on the Outline Environmental Masterplan (OEM) [updated alongside this submission] and are secured via the Works Plans [AS-004], Outline Landscape and Ecological Management Plan (oLEMP) [updated alongside this submission], and the Design Parameters and Commitments [updated alongside this submission] document. The Applicant provided further information on the assumptions regarding the establishment of proposed planting against agenda item 4.7(a) of the Applicant’s Written Summary of Applicant’s Oral Submissions at ISH1 [REP1-004].
REP1-029; REP1-032; REP1-037; REP1-043; REP1-044; REP1-050	T-WR-LAN-02	Landscape and Visual	The Proposed Development and its associated electrical infrastructure are considered to industrialise or fundamentally alter the rural landscape, countryside character, open space and tranquillity, including at Field House Farm and across the villages surrounding the solar sites.	The landscape where the Proposed Development is located is not a natural landscape, it has evolved substantially through decades of agricultural industrialisation, which has resulted in generally large arable fields with a substantially more disparate and fragmented landscape pattern. Solar development therefore needs to be assessed within the context of an already highly modified working landscape rather than against an idealised or pre-industrial baseline.

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				This is reflected in the landscape baseline set out in ES Volume 3, Appendix 10.2: Landscape Baseline and Effects [APP-168], which draw upon existing published landscape character assessments that recognise this transition and that change is a character of the landscape itself. No open space will be affected by the operational aspects of the Proposed Development. With respect to tranquillity, ES Volume 2, Figure 10.7: Tranquillity [APP-097] presents the published data provided by CPRE: The Countryside Charity. This shows that most of the study area falls within areas in the middle of the range nationally. Tranquillity is a relative measure and locally is affected by a range of positive and negative factors, which are set out in ES Volume 3, Appendix 10.1: Landscape and Visual Assessment Methodology [APP-167]. These factors have been assessed on site and have fed into the assessment of the value attached to the landscape and the magnitude of impact presented in ES Volume 3, Appendix 10.2: Landscape Baseline and Effects [APP-168]. The introduction of the Proposed Development will increase the perception of over human impacts in the early years of operation, but over time as the proposed grassland and planting establishes, it will also substantially improve integration and screening and the nature network across the landscape. The LVIA acknowledges that the Proposed Development will result in further localised changes to landscape character, resulting in moderate adverse significant effects across all Solar Development Sites during construction and at year 1 of operation. These effects would largely reduce to not significant by year 15 of operation, with the exception of SDS 2, SDS6 and SDS7. This is consistent with paragraph 5.10.5, which states that “<i>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.</i>” However, at the landscape scale, significant effects are only identified for LCA 3, LCA 11, LCA 13 and LCA 14 during construction and for LCA 3 at year 1 of operation. All other LCAs would experience effects which are not significant by year 15 of operation. This is achieved by robustly applying the mitigation hierarchy by siting the Proposed Development on land with low landscape sensitivity, avoiding permanent above ground infrastructure in more sensitive landscapes and views and embedding mitigation. The Proposed Development has been designed intentionally to avoid encroaching on boundaries of existing settlements from the earliest stage. With respect to the views of residents, for example at Field House Farm, it is an established planning principle that views from residential properties are a matter of private amenity. Field House Farm is located to the east of the proposed CRC1-4. Impacts on views would be temporary, short-term and limited to the construction period. Thereafter, views would return to the baseline situation.

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REP1-043	T-WR-LAN-03	Landscape and Visual	The assessment is said not to reflect the value of the landscape and open outlook to the people who live there, particularly where the landscape has been characterised as 'low value'.	The Applicant has carried out an objective assessment of the value attached to the landscape and views based on evidence and detailed analysis with reference to best practice. This is because for the purposes of planning and decision making, there must be a clear distinction between those landscapes and views which are of the most value and those which are of the least with respect to society as a whole. This helps direct development to areas which are most able to accommodate planned development with appropriate mitigation. The approach undertaken is described in detail in ES Volume 3, Appendix 10.1: Landscape and Visual Assessment Methodology [APP-167] and is supported by the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition and the subsequent Notes and Clarifications published as Landscape Institute Technical Guidance Note (TGN) 02/24. Detailed criteria against which the value attached to the landscape are set out in Table 1-2 and the value attached to views in Table 1-7 of ES Appendix 10.1 [APP-167]. The LVIA has concluded that the landscape within the study area is not covered by any national landscape designations. Some parts of the study area, for example around Hambleton are covered by Locally Important Landscape Areas (LILA), which is a local landscape designation. These areas have been assessed as having high landscape value. Outside of these areas, the weight of evidence has been considered by applying the factors set out in Landscape Institute TGN 02/21: Assessing landscape value outside national designations. In areas of low landscape value and where the value attached to views is assessed as low, this is because there are few attributes or characteristics which individually or collectively raise it above “every day” landscapes as defined in the guidance. Best practice guidance establishes that there is a close relationship between the value attached to the landscape and to the value attached to views across the landscape. Individuals may attribute higher values to their private views, but it is a established planning principle that there is no right to a view.
Aviation				
REP1-037	T-WR-AVI-01	Aviation	Potential aviation effects from glint and glare, tracking panels and the location or loss of emergency landing areas require more robust assessment and consultation with Sherburn Aero Club, relevant aerodromes and aviation-safeguarding bodies.	As per Comment Reference GLI-03 within the Applicant's Response to Relevant Representations (Part 2) [AS-036], Glint and Glare impacts have been assessed fully within the Glint and Glare Assessment [APP-186] and the Other Environmental Matters chapter [updated alongside this submission]. The assessment confirms that the impact predicted by the Glint and Glare modelling does not occur in practice, and on this basis it is the position of the Applicant that specific mitigation measures are not required. In addition, a new emergency landing strip is proposed and will be positioned directly in line with and underneath the climb-out path from runway 19 at Sherburn-in-Elmet airfield.

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				Furthermore, engagement with Sherburn-in-Elmet Airfield (which continues) and the Civil Aviation Authority (CAA) has been conducted to understand any other aviation safety concerns that they may have.
Biodiversity and Ecology				
REP1-032; REP1-042; REP1-044	T-WR-BIO-01	Biodiversity and Ecology	The claimed Biodiversity Net Gain and other ecological mitigation are said to depend on future habitat creation, assumptions and outline management rather than secured outcomes. Respondents seek verified baselines, enforceable habitat targets, independent monitoring, condition milestones, failure thresholds, remedial measures, responsible bodies and long-term mechanisms to ensure commitments are delivered.	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) [updated alongside this submission], detailed in the Outline Landscape and Ecological Management Plan (oLEMP) [updated alongside this submission] and the Outline Bird Mitigation Area Management Plan (oBMAMP) [APP-205]. The oLEMP [updated alongside this submission] 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 [updated alongside this submission], is secured through the Draft Development Consent Order (DCO) [updated alongside this submission], ensuring that ecological mitigation and enhancement measures (including BNG) are delivered, monitored and maintained throughout the lifetime of the Proposed Development including remedial measures where necessary.
REP1-037; REP1-039; REP1-050	T-WR-BIO-02	Biodiversity and Ecology	Construction, fencing and long-term solar infrastructure are considered capable of disturbing wildlife, fragmenting habitats and restricting species movement. Respondents seek protection of functional ecological corridors and evidence that retained habitats will remain usable throughout construction and operation.	Potential effects of boundary treatments and fencing on ecology and wildlife movement are assessed in ES Volume 1, Chapter 6: Biodiversity [updated alongside this submission], which considers impacts on habitats and species during construction, operation and decommissioning and identifies measures to avoid or mitigate barriers to wildlife movement. The Proposed Development design incorporates fencing around the Solar PV Arrays that is permeable to wildlife, with the exception of deer. This means animals, including small mammals such as badger and otter, as well as amphibians

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				and reptiles, will be able to freely access habitats within the Solar PV Sites without the need for wildlife gates. Existing commuting routes through the site, including hedgerows, ditches and treelines, will be retained, buffered and appropriately protected throughout all phases of the Proposed Development to ensure fauna are able to move through the site and habitats do not become fragmented. The Applicant can confirm that commuting routes through the site for deer, such as ditches, hedgerows and their surrounding buffers, have been incorporated throughout the Proposed Development, with fencing designed to work around these routes; this is detailed further in Table 6-6 of ES Volume 1, Chapter 6: Biodiversity [updated alongside this submission]. In addition, wide buffers are retained around the peripheries of the Solar PV Sites to allow wildlife, including deer, to move between favoured habitats. The Proposed Development also includes wide internal commuting corridors comprising neutral grassland and other valuable ecological habitats which will remain unfenced, helping to maintain the permeability of the Order Limits for a range of fauna. Collectively, these existing and newly created corridors will help limit habitat fragmentation within the Order Limits and cumulatively when considered alongside other consented developments. These measures are described in ES Volume 1, Chapter 6: Biodiversity [updated alongside this submission], detailed in the Outline Landscape and Ecological Management Plan (oLEMP) [updated alongside this submission] and shown indicatively on the Outline Environmental Masterplans (OEM) [updated alongside this submission]. In addition, arable land within the Solar PV Sites will be replaced with grassland beneath the solar panels, which will provide suitable commuting and foraging habitat for a range of fauna. The cessation of intensive agricultural practices, including the reduced use of pesticides and other agrochemicals, is also expected to contribute to an overall improvement in biodiversity value across the Order Limits over the lifetime of the Proposed Development. Fencing will be subject to regular inspection and maintenance to ensure continued permeability to wildlife and effective functioning over the lifetime of the Proposed Development. Measures for ongoing ecological management and maintenance are set out in the Outline Landscape and Ecological Management Plan (oLEMP) [updated alongside this submission]. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the oLEMP [updated alongside this submission], is secured via the Draft

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				Development Consent Order (DCO) [updated alongside this submission] , ensuring that fencing design, habitat management and maintenance measures are delivered and maintained throughout the lifetime of the Proposed Development.
REP1-053	T-WR-BIO-03	Biodiversity and Ecology	Gaps are identified in site-specific ecological baselines, including badgers and wildlife using hedgerows, trees and field margins close to affected properties and access routes. Respondents seek completed baseline evidence and enforceable survey, buffer, licensing and stop-work controls.	All of the survey work completed abides by best practice guidance with regards to survey effort, with the scope of the surveys approved by Natural England and North Yorkshire Council. All survey work was completed and informed the Environmental Statement (ES). The surveys and assessments that have been completed are considered sufficient to support a robust assessment of likely significant effects. The results of the surveys can be found in the ES Chapters and the appendices, including ES Volume 3, Appendix 6.1: Habitats Report [APP-151], Appendix 6.2: Otter Report [APP-152], Appendix 6.3: Badger Report (confidential) [APP-153], Appendix 6.4: Bat Report [updated alongside this submission], Appendix 6.5: Fish Habitat Assessment and eDNA Survey (Aquatics Report) [APP-155], Appendix 6.6: GCN Report [updated alongside this submission], Appendix 6.7: Water Vole Report [APP-157], Appendix 12.1: Breeding Bird Survey Report - Solar Development Sites 1-5 [APP-174], Appendix 12.2: Non-breeding Bird Survey Report [APP-175], and Appendix 12.3: Breeding Bird Survey Report - Solar Development Sites 6-8 [APP-176]. Potential impacts on ecology and biodiversity are fully assessed in ES Volume 1, Chapter 6: Biodiversity [updated alongside this submission] and ES Volume 1, Chapter 12: Ornithology [updated alongside this submission]. 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.

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				These measures include but are not limited to the implementation of an Outline Construction Environmental Management Plan (oCEMP) [updated alongside this submission] and Outline Landscape and Ecological Management Plan (oLEMP) [updated alongside this submission], which detail any required buffers, licensing or stop-work controls, to protect fauna and flora during the construction and operation phase.
Ornithology				
REP1-032	T-WR-ORN-01	Ornithology	The adequacy of bird survey and mitigation evidence is questioned, including survey completeness for later-added Sites 6–8, the basis and scope of Natural England agreement, non-breeding bird mitigation and whether cumulative functional habitat, displacement and flight lines have been properly assessed.	The Applicant assumes that this comment likely relates to the staggering of the breeding bird surveys, where surveys within Solar Development Sites 6-8, which were undertaken later due to their subsequent inclusion within the Order Limits. As ecological surveys are constrained by seasonal survey windows, surveys were completed during the next appropriate period in accordance with relevant guidance and best practice. The timing of these surveys does not affect their validity, and the data collected remains robust and suitable for informing the assessment. Non-breeding bird survey scope and methodology were agreed through consultation with Natural England, to whose advice North Yorkshire Council has deferred. Breeding bird survey requirements were agreed directly with North Yorkshire Council. The consultation undertaken and the agreed survey approaches are documented within Environmental Statement Volume 1 Chapter 12: Ornithology [updated alongside this submission]. Cumulative Assessment results are presented within Environmental Statement Volume 1 Chapter 12: Ornithology [updated alongside this submission] and in-combination assessment (non-breeding birds/Functionally linked land more specifically) are detailed within Shadow Habitat Regulations Assessment (sHRA) [updated alongside this submission]. Flight lines are presented and illustrated within Environmental Statement Volume 3, Appendix 12.2: Non-breeding Bird Survey Report [AS-019 – AS-031] and are discussed within Environmental Statement Volume 1 Chapter 12: Ornithology [updated alongside this submission]. The concerns of the respondent have been fully reviewed and agreed with by Natural England REP1-025.
REP1-037; REP1-043; REP1-053; REP1-054	T-WR-ORN-02	Ornithology	Concern is raised about effects on locally valued and protected birds, including Barn Owls and other Red- and Amber-listed species, through disturbance, displacement, changes to habitat and reflected light that may affect bird movement or migration.	The Respondent's concern is noted. The Environmental Statement (ES) provides a detailed species- and receptor-specific assessment of the bird assemblage recorded within the Order Limits and the surrounding landscape, including consideration of barn owl and Red and Amber List species. The assessment found that potential effects are principally associated with ground-nesting birds, waders, wildfowl, Schedule 1 species and Annex I species.

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				Potential effects arising from habitat loss and modification, construction disturbance, displacement and operation of the Proposed Development have been fully assessed. Appropriate mitigation and management measures have been identified and secured through the relevant management plans and application documents: Outline Construction Environmental Management Plan (oCEMP) [updated alongside this submission], Outline Operational Environmental Management Plan (oOEMP) [updated alongside this submission], Outline Decommissioning Management Plan (oDEMP) [updated alongside this submission], Outline Landscape and Ecological Management Plan (oLEMP) [updated alongside this submission], and the Outline Bird Mitigation Area Management Plan (oBMAMP) [updated alongside this submission]. In relation to bird flight movements, the Applicant notes that solar developments do not present a physical barrier to airspace. Furthermore, there is no evidence from the UK to indicate that reflected light from solar panels results in significant adverse effects on birds. Solar panels are specifically designed to absorb, rather than reflect, solar energy, and the Applicant is not aware of any evidence demonstrating that solar panels create a flight hazard or barrier effect for bird species. The Applicant notes that no concerns on this matter have been raised by the relevant statutory bodies during consultation, and this provides additional confidence in the conclusions of the assessment.
Arboriculture				
REP1-053; REP1-054	T-WR-ARB-01	Arboriculture	Greater certainty is sought over which trees and hedgerows would be retained, pruned or removed, including Field House Farm boundary vegetation, and over the establishment, survival, monitoring and replacement of new planting relied upon for mitigation.	The Applicant has set out the detail of tree retention, removal and pruning in informed by ES Volume 3, Appendix 16.2: Arboricultural Impact Assessment [APP- 184] based on worst-case assumptions, including around Field House Farm. On this basis, removals along the boundaries of this property would be limited to short lengths of hedge and 4 individual trees along Skipwith Road, and 1 individual trees, 1 tree group and 2-3 trees from a woodland block, all on adjacent land to the east of the access driveway to facilitate construction access, but the requirements for removal will be confirmed after detailed design. Any trees or hedges lost to cable installation will be replanted where appropriate in the Cable Route Corridor. This is set out in the Design Parameters and Commitments document [updated alongside this submission] and the outline Construction Environmental Management Plan [updated alongside this submission]. Requirement 12 in Schedule 2 to the Draft Development Consent Order (DCO) [updated alongside this submission] 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 [updated alongside this submission]. All construction works must be carried out in accordance with the approved CEMP.

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Water Resources and Flood Risk				
REP1-032; REP1-035	T-WR-WAT-01	Water Resources and Flood Risk	More detailed, site-specific and cumulative flood-risk assessment is requested, including flood-zone land take, surface-water and groundwater pathways, floodplain conveyance/storage, climate-change allowances, the vulnerability and levels of substations/BESS and other infrastructure, interaction with local drainage/flood defences, and clear positions from the Environment Agency and Lead Local Flood Authority.	The Applicant notes that the matters raised are already addressed within the Flood Risk Assessment (FRA) [updated alongside this submission]. The FRA includes consideration of detailed site-specific flood risks and hydraulic modelling, Flood Zones and climate change allowances, surface water and groundwater flood risk, floodplain conveyance and storage, the vulnerability and resilience of proposed infrastructure (including substations and BESS), interactions with existing drainage systems and flood risk infrastructure. The assessment has been informed by consultation with the Environment Agency, Lead Local Flood Authorities, and relevant Internal Drainage Boards. The FRA submitted at Deadline 2 identifies indicative minimum Finished Floor Levels for flood-affected infrastructure where elevation may be required. The assessment confirms that the resulting infrastructure heights remain within the maximum development parameters secured by the Design Parameters and assessed as part of the Proposed Development.
REP1-052	T-WR-WAT-02	Water Resources and Flood Risk	Concern is raised over whether local water-supply capacity can meet additional project demand without adversely affecting residential water availability.	The Water Resource Assessment [updated alongside this submission] sets out the options for water supply to the proposed development, of which one is mains water supplied by Yorkshire Water. As discussed in ISH-1, this is one of a suite of options and non-potable sources would be used in preference to potable mains water where possible. However, these decisions will be made at detailed design, post DCO. Yorkshire Water have confirmed that they can supply the quantities estimated from the mains network for the Proposed Development. The potential connection points within the Order Limits are presented in the revised Water Resources Assessment [updated alongside this submission].
Traffic and Movement				
REP1-030; REP1-032	T-WR-TRA-01	Traffic and Movement	The safety of proposed construction routes is questioned, including whether the most direct route is necessarily the safest, whether accident data adequately reflects fatalities, unreported incidents and near misses, and whether visibility risks such as low sun at sunrise/sunset have been properly assessed.	The Applicant notes this comment and can confirm that the construction route access strategy was developed following consideration of a range of operational, environmental and highway factors. The Transport Assessment [updated alongside this submission] includes a road safety review of access routes based on publicly available collision data. This data relates to collisions on the public highway that have been reported to the police and recorded through the STATS19 collision reporting system.

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				Construction traffic will utilise the same highway network as existing traffic and will therefore be subject to the same potential effects associated with east-west travel with regards to sunrise and sunset.
REP1-030; REP1-035; REP1-042	T-WR-TRA-02	Traffic and Movement	Construction traffic controls should apply comprehensively to deliveries, contractor/worker traffic and other movements, with enforceable routing, operating hours, speed, convoy, waiting and cut-through restrictions, monitoring and enforcement rather than relying only on delivery-time commitments.	The Applicant notes this comment. Construction traffic will be managed through measures included within the outline Construction Traffic Management Plan (oCTMP) [updated alongside this submission], which will be developed further through a detailed Construction Traffic Management Plan (CTMP) as secured by Requirement 14 in Schedule 2 to the draft DCO [updated alongside this submission]. The oCTMP includes measures covering working and delivery time restrictions, proposed traffic management measures such as reduced speed limits and signage, specified construction routes and wheel washing requirements.
REP1-032; REP1-033; REP1-035; REP1-037; REP1-042; REP1-043	T-WR-TRA-03	Traffic and Movement	The suitability, capacity and safety of the rural road network for the proposed volume of HGVs, contractor vehicles and other construction traffic are questioned, including the A63/A162, Wistow roads, Common Lane and narrow village/farm roads that are unlit, constrained or lack footways.	The Applicant notes this comment and can confirm that the construction route access strategy was developed following consideration of a range of operational, environmental and highway factors. As part of the route selection process, design workshops were held during the scoping stage and a number of site visits were undertaken. Engagement was also undertaken with North Yorkshire Council during the early stages of route development to understand whether any routes were considered unsuitable for construction traffic or should be avoided. The Transport Assessment [updated alongside this submission] considers the change in traffic flows and composition on roads serving the Proposed Development and concludes that the temporary increase in traffic is not expected to have a significant impact and that any temporary impacts arising from the Proposed Development can be effectively managed through the measures set out in the outline Construction Traffic Management Plan (CTMP) [updated alongside this submission]. The oCTMP includes measures such as timing restrictions to avoid use of the A63/A162 junction during the peak hours and the provision of passing places on roads such as Common Lane to facilitate the movement of construction traffic.
REP1-035; REP1-042	T-WR-TRA-04	Traffic and Movement	Emergency-service access must be maintained throughout construction, with routes, passing places, swept paths, turning provision and other measures demonstrated so that construction traffic cannot obstruct or delay ambulance, fire or police access.	The Applicant notes this comment and confirms that access for emergency vehicles will be maintained during construction. Any temporary traffic management measures will be developed in consultation with, and agreed by, the Local Highway Authority. As part of this process, due regard will be given to ensuring that access for emergency services is not adversely affected.

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REP1-043; REP1-054	T-WR-TRA-05	Traffic and Movement	Public Rights of Way, permissive paths and recreational routes could be disrupted, diverted or made less safe and attractive by the Proposed Development. Respondents seek accurate mapping and comparison of existing and proposed routes, including accessibility, tranquillity, proximity to infrastructure and the consequences if permissive access is withdrawn.	As per Comment Reference SOC-23 within the Applicant's Response to Relevant Representations (Part 2) [AS-036] , the impact of the Proposed Development on Public Rights of Way has been assessed within ES Volume 1, Chapter 13: Socioeconomics [updated alongside this submission] . ES Volume 3, Appendix 13.1: Socioeconomic Receptors Impact Assessment [APP-177] and the Outline Public Rights of Way Management Plan (oPROWMP) [APP-199] outline the assessed impacts of the Proposed Development of these Public Rights of Way. The oPROWMP details that wherever practicable, Public Rights of Way will remain open, and if temporary closure is required, alternative permissive paths will be installed to ensure there is no loss of recreation. Further information can be found in Section 3 of the oPROWMP.
Noise and Vibration				
REP1-032; REP1-052	T-WR-NOI-01	Noise and Vibration	Operational noise from the BESS, tracking motors, inverters, transformers and other plant requires more robust receptor-specific assessment and enforceable limits. Concerns include the Applicant's refusal to adopt the Council's preferred design criterion, reliance on unfixed mitigation, cumulative/synchronised equipment, tonality, intermittency and low-frequency sound, and the risk of an audible BESS hum in a quiet rural environment.	The assessment of operational noise, which includes transformers, BESS enclosures, and conversion units, 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 considers acoustic character of noise sources, noise modelling of all sources, consideration of source spectrum and existing baseline sound levels. The assessment concludes that with the implementation of mitigation measures, impacts are assessed as not significant. Details of the assumptions about operational noise plant are presented in ES Volume 3 Appendix 11.3: Operational Noise and Vibration Assumptions and Results [APP-173] in Table 2-1. The assessment also considers low frequency impacts by reference to NANR45 as presented in Section 11.9 of ES Volume 1, Chapter 11: Noise and Vibration [APP-049]. With regards to Council's preferred criterion, the assessment has been undertaken according to the requirements of the EIA Regulations and Government policy to identify likely significant effects and the need for any mitigation. The aim has been to mitigate and minimise impacts as far as reasonably practicable. However, in some cases the low baseline background sound levels mean that it is not practicable to meet the Council's preferred design criterion at all receptors. Where the background sound levels (L_{A90}) cannot be met, the mitigated absolute level of sound from the Proposed Development is calculated to be sufficiently low not to cause a significant effect. As for the final selection of plant and mitigation measures, as noted in Section 11.8 Embedded and good practice mitigation and enhancement measures of the ES Volume 1, Chapter 11: Noise and Vibration [APP-049], the design is expected to continue evolving, and changes may occur. Any changes will ensure that resulting operational noise impacts do not

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				lead to significant effects. The Noise and Vibration Chapter then notes that: <i>“given this, the Applicant has committed that, as part of its submission of the detailed OEMP, it will include:</i> <i>1. Details of the operational noise mitigation measures that have been implemented as part of the detailed design;</i> <i>2. A noise impact assessment of the finalised detailed design of that part of the Proposed Development to which the OEMP relates. This will be required to demonstrate that the operational noise sources will not lead to materially new or materially different effects that are worse than reported in this chapter;</i> <i>3. A commitment to undertake and submit to North Yorkshire Council a verification exercise (the methodology for which will be sought to be agreed as part of the detailed OEMP) three months after operations begin for that part of the Proposed Development. This verification exercise will seek to confirm that the conclusions of that noise impact assessment have been borne out; and</i> <i>4. A commitment that if that verification exercise concludes that the conclusions have not been borne out that the Applicant will undertake remedial actions to ensure those conclusions are delivered.”</i> These commitments are set out in the Outline Operational Environmental Management Plan (oOEMP) [updated alongside this submission].
REP1-033; REP1-035; REP1-037; REP1-043; REP1-053	T-WR-NOI-02	Noise and Vibration	Construction noise and vibration from piling, plant, HGVs and associated works could adversely affect nearby residents, recreational users, animals and businesses. Respondents question whether construction noise has been accurately assessed against local background conditions and other relevant factors.	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). In line with the standard, noise impact thresholds for construction noise consider the existing baseline sound levels. As a cautious worst-case scenario, the thresholds have been assigned to the most strict threshold (category A). Details of the assessment including plant and 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 piling and various construction activities, concludes that adverse effects from construction noise and vibration are not significant, following the application of best practicable measures of mitigation. The assessment of construction traffic noise (which covers noise from HGVs using existing road network) 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

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				control on construction and open sites – Noise, as well as Calculation of Road Traffic Noise (CRTN) and the Design Manual for Roads and Bridges (DMRB) LA 111. For construction traffic noise, the assessment concludes that most road links would be subject to negligible impacts from construction traffic noise, although there would be some minor adverse impacts and one moderate adverse impact (on Common Lane, Hambleton). This moderate adverse impact equates to an average of two to three vehicles per hour during the working day (ES Volume 1, Chapter 11: Noise and Vibration [APP-049] paragraph 11.9.33). This is unlikely to result in an appreciable change in noise levels at the nearby receptors. ES Volume 1, Chapter 14: Traffic and Movement [updated alongside this submission] outlines a range of noise and vibration mitigation measures, including the implementation of a Construction Traffic Management Plan (CTMP). The measures that would be secured through the final CTMP are detailed in the outline Construction Traffic Management Plan (oCTMP) [updated alongside this submission] and include reducing the need for construction vehicles to travel during the network peak hours.
Socio-Economics, Recreation and Tourism				
REP1-033; REP1-037; REP1-038; REP1-043	T-WR-SOC-01	Socio-Economics, Recreation and Tourism	Construction traffic and the presence of the development could reduce the safety, tranquillity and enjoyment of walking, cycling, horse riding, running, dog walking and children's countryside activities, particularly around Common Lane, with consequent effects on recreation, health and wellbeing.	The Applicant acknowledges the importance of the local Public Rights of Way network and surrounding countryside for a range of recreational activities, including walking, cycling, horse riding, running and dog walking. The effects of the Proposed Development on Public Rights of Way (PRoW), recreational access and community receptors (including PRoW's around Common Lane) have been assessed within ES Volume 1, Chapter 13: Socioeconomics [updated alongside this submission], supported by the outline Public Rights of Way Management Plan (oPRoWMP) [APP-199]. The assessment concludes that, with embedded mitigation and management measures in place, no significant residual effects on Public Rights of Way or recreational receptors are anticipated. The Applicant has incorporated a range of measures to maintain access and recreational amenity throughout the lifecycle of the Proposed Development. These include maintaining Public Rights of Way wherever practicable, managing temporary diversions where required, providing clear signage, implementing landscaping and maintaining a minimum 15 metre offset between Public Rights of Way and infrastructure, as well as providing new permissive paths to enhance connectivity and recreational opportunities. This detail can all be found in the outline Public Rights of Way Management Plan (oPRoWMP) [APP-199]. The management of construction traffic and interactions with recreational users, including on Common Lane, is addressed through the outline Construction Traffic Management Plan (oCTMP) [updated alongside this submission] and the oPRoWMP [APP-199]. These documents

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				include measures such as controlled vehicle movements, traffic routing, signage, banksmen where appropriate and management of Public Rights of Way crossings to minimise potential conflicts between construction traffic and users of walking, cycling and equestrian routes. As shown on the Outline Environmental Masterplans (OEM) [PDA-003 to PDA 010] and secured in the Works Plans [AS-004], the solar development will be set back from Common Lane generally by more than 10m and separated from the road by retained vegetation as well as proposed mitigation planting. Existing trees, hedgerows and other landscape features along the road have been retained wherever possible and incorporated into the design. Additionally, substantial landscape mitigation is proposed, including reinforcement of existing hedgerows and the establishment of new native hedgerows and trees along Common Lane and the wider Site. These measures have been specifically designed to strengthen the existing landscape framework, filter views of infrastructure and assist the integration of the Proposed Development into its surroundings. As recognised in the LVIA, the greatest effects will occur during construction and the early years of operation before mitigation planting has become established. Over time, as planting matures, views will become increasingly filtered and softened, reducing the perception of development from Common Lane and strengthening the rural character of the route.
REP1-037; REP1-039; REP1-044; REP1-047; REP1-053; REP1-054	T-WR-SOC-02	Socio-Economics, Recreation and Tourism	Nearby tourism and rural businesses, particularly at Field House Farm, are said to depend on peace, wildlife, rural character, reliable access and customer confidence. Construction traffic, noise, dust, machinery, visual change and access disruption could reduce bookings, damage reputation and create wider economic and amenity effects; respondents seek an integrated assessment of these combined impacts and any compensation process.	The Applicant acknowledges these concerns. The Environmental Statement includes an assessment of tourism, recreation and business receptors within ES Volume 1, Chapter 13: Socioeconomics [updated alongside this submission], supported by ES Volume 3, Appendix 13.1: Socioeconomic Receptors Impact Assessment [APP-177]. The assessment considers the effects of the Proposed Development on identified tourism, recreation and business receptors, taking account of relevant pathways through which effects may occur, including changes in amenity, construction activity, traffic movements and access arrangements. Specific rural business and tourism receptors, including Field House Farm have been assessed where relevant. Where potentially significant effects were identified, mitigation measures have been incorporated into the Proposed Development and the residual effects reassessed. Following the implementation of mitigation, the assessment concludes that no significant residual effects on tourism businesses, local businesses or the wider local economy are anticipated. Access to businesses, tourism assets and community facilities would be maintained throughout the construction and operational phases of the Proposed Development. The outline Construction Traffic Management Plan (oCTMP) [updated alongside this submission] and Outline Construction Environmental Management Plan (oCEMP) [updated alongside this submission] include measures to manage construction

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				traffic, reduce disturbance and maintain communication with affected businesses and local communities during construction. The Applicant does not therefore consider that the combined effects of construction traffic, noise, dust, visual change and temporary construction activity would result in significant adverse effects on the operation or viability of identified tourism and rural business receptors. Whilst some temporary and localised changes in amenity may occur during construction, these have been assessed within the Environmental Statement and, taking account of mitigation, are not predicted to result in significant residual socio-economic effects. Entitlement to compensation is not determined through the Environmental Impact Assessment process. Any compensation claims would be considered separately through the relevant statutory processes and assessed on a case-by-case basis in accordance with the applicable legislative framework. As set out in the Book of Reference [updated alongside this submission], claims submitted would be considered in accordance with the relevant legislation.
REP1-033; REP1-042	T-WR-SOC-03	Socio-Economics, Recreation and Tourism	Concern is raised that the development could reduce nearby residential property values. Respondents ask whether property-value effects have been assessed and whether compensation would be available where a demonstrable loss occurs.	The Applicant acknowledges this concern and refers to the response provided as part of the Applicant’s Response to Relevant Representations (Part 2) [AS-036], specifically Comment Reference SOC-02. The Applicant has submitted the Book of Reference [updated alongside this submission] which includes persons who may be eligible to claim compensation if the Development Consent Order is granted and the Proposed Development developed. The Applicant will comply with statutory processes for any compensation claims submitted and will review and assess each claim in accordance with the relevant legislation under which it is made.
REP1-037	T-WR-SOC-04	Socio-Economics, Recreation and Tourism	The Proposed Development could result in a net loss of local employment by displacing farming, farm contractors and food-supply-chain activity while creating relatively few long-term operational jobs.	The Applicant acknowledges concerns regarding potential effects on agricultural employment and the wider rural economy. As set out in ES Volume 1, Chapter 13: Socioeconomics [updated alongside this submission], the assessment considered the potential effects of the Proposed Development on employment and economic activity within the Study Area. The assessment concludes that the Proposed Development would generate positive economic effects through construction employment, expenditure within the local economy and opportunities for local businesses and supply chains. The EIA Scoping Report proposed to scope out effects on agricultural holdings and farm businesses because the landowners involved in the solar and battery elements of the Proposed Development have entered into voluntary agreements and have therefore considered the implications for the viability and operation of their farming businesses. The affected land is not subject to long-term agricultural tenancy arrangements or succession rights that would be displaced by the Proposed Development.

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				ES Volume 1, Chapter 13: Socioeconomics [updated alongside this submission] notes that no job losses are anticipated across most farms within the Order Limits. One farm identified the potential for a single job loss; however, this was assessed as negligible in the context of the wider economy and was not considered likely to give rise to significant socio-economic effects. The assessment therefore does not identify a significant loss of agricultural employment arising from the Proposed Development. Whilst the operational phase of a solar development typically requires fewer staff than the construction phase, the Proposed Development is expected to support approximately 520 net additional construction jobs during the build period and approximately 390 net jobs during decommissioning, following the application of standard additionality assumptions. The Applicant has also committed to measures to maximise local employment, skills development and supply chain opportunities through the Outline Skills, Supply Chain and Employment Plan (oSSCEP) [APP-202]. The Proposed Development would also provide participating agricultural businesses with a long-term and stable diversification income stream, helping to support the resilience of those businesses against fluctuations in agricultural markets and farm incomes. Taking these factors into account, the Applicant does not consider that the Proposed Development would result in a significant adverse effects on the local economy.
Cumulative and In-Combination Effects				
REP1-032; REP1-037; REP1-043; REP1-044; REP1-050	T-WR-CUM-01	Cumulative and In-Combination Effects	Light Valley Solar should be assessed collectively with existing, consented, under-construction and reasonably foreseeable developments rather than in isolation. Respondents seek a transparent project schedule and receptor-by-receptor assessment of overlapping construction and combined effects on traffic, landscape, ecology, agriculture, drainage, Public Rights of Way, grid infrastructure and local communities.	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 including flooding. The cumulative assessment has taken into account nearby developments, including other solar projects, that align within the relevant zones of influence for each topic to evaluate potential combined effects. Construction phase information is included within Section 2.7 of ES Volume 1, Chapter 2: The Proposed Development [updated alongside this submission] including an indicative construction programme. This has been used to understand potential cumulative impacts for each topic assessment.
Agricultural Land and Soils				

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REP1-032; REP1-037; REP1-049	T-WR-AGR-01	Agricultural Land and Soils	Claims that agricultural land use is temporary or readily reversible are questioned. Concerns include long-term soil effects from piling, trenching and compaction, the 60-year operational period, replacement of panels during that period, and whether land will genuinely return to its former agricultural quality and productivity.	ES Volume 1, Chapter 5: Agricultural Land and Soils [updated alongside this submission] confirms that the use of land for solar panels in the Solar Development Sites is reversible but does not state readily. ES Volume 1, Chapter 2: The Proposed Development [updated alongside this submission] confirms that the decommissioning phase may extend to up to 24 months. Best practice principles for soil handling, which includes suitable ground conditions for traversing the land with machinery, as contained within the Outline Soil Resources Management Plan (oSRMP) [updated alongside this submission] will be in effect for the duration of the Proposed Development. The measures will minimise or avoid adverse impacts on the land and soils, namely compaction, and include protection measures for stockpiled soils to be used for reinstatement. The condition of soils excavated and those left in-situ will therefore largely be maintained during construction. ES Volume 1, Chapter 5: Agricultural Land and Soils [updated alongside this submission] confirms in paragraphs 5.9.25 to 5.9.29 that by leaving the land and soil undisturbed for the duration of the Proposed Development, multiple benefits to soil health are expected to occur. Considerate management of the soil resources throughout construction, extending the application of best practice principles through the operational phase and enabling improvements to soil health, collectively promote the successful reinstatement of agricultural land quality at decommissioning.
REP1-032; REP1-042; REP1-053	T-WR-AGR-02	Agricultural Land and Soils	The Applicant should clearly quantify the amount and grade of agricultural/BMV land affected by built infrastructure and mitigation and consider cumulative loss, rather than presenting the Proposed Development's land take only as a small percentage of a much larger district or county-wide resource.	The areas of land of each grade required for built infrastructure are set out in paragraphs 5.9.12 to 5.9.17 of ES Volume 1, Chapter 5: Agricultural Land and Soils [updated alongside this submission] . The assessment of cumulative losses of agricultural land alongside other proposals in the locality is set out in Section 5.14.
REP1-036; REP1-037; REP1-046; REP1-049; REP1-050; REP1-051; REP1-053	T-WR-AGR-03	Agricultural Land and Soils	Loss or reduced productivity of high-quality agricultural land is opposed because of potential effects on local food production, national food security and resilience. Respondents argue that productive farmland should be retained for agriculture rather than extensive ground-mounted solar where alternatives may be available.	Chapter 5: Agricultural Land and Soils [updated alongside this submission] states that food security has been considered and that 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 486ha of BMV land within the Proposed Development (of which approximately 19.1ha 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.

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				Table 5-20 of ES Volume 1, Chapter 5: Agricultural Land and Soils [updated alongside this submission] demonstrates that high-quality agricultural land in Grades 1 and 2 collectively accounts for 20% of the area of the Solar Development Sites. Additionally, 34% is Subgrade 3a which is the lowest of the BMV grades, and the remainder is Subgrade 3b which is not BMV and not considered to be amongst the most productive agricultural land. As noted in the Outline Decommissioning Environmental Management Plan [updated alongside this submission], the land under panels in each Solar Development Site will be restored to its current use and returned to the landowner. While landowners may choose to retain ecological mitigation planting, there will otherwise be no loss of agricultural land associated with the Proposed Development. Whilst under panels, the land is somewhat safeguarded for potential future agricultural use.
Human Health				
REP1-044	T-WR-HUM-01	Human Health	Large-scale solar arrays are alleged to create a localised heat-island effect that could affect nearby residents and is cited as a reason for greater residential separation.	As per Comment Response MAD-02 provided as part of the Applicant's Response to Relevant Representations (Part 2) [AS-036] , evidence from published research indicates that large-scale solar arrays do not give rise to significant or widespread heat island effects. Any temperature increases associated with solar PV installations are localised and do not extend beyond the immediate boundary of the solar farm. On this basis, heat island effects are not considered to be significant for nearby residents or surrounding land uses.
Materials, Waste and Minerals				
REP1-051	T-WR-WAS-01	Materials, Waste and Minerals	Would the proposed solar panels be manufactured, supplied and fitted by a British company, thereby contributing to the British economy? The government is keen to have us invest heavily in British businesses. Nothing has been mentioned that I have seen or heard regarding this point.	As per Comment Response DES-05 provided as part of the Applicant's Response to Relevant Representations (Part 2) [AS-036], currently the majority of solar panels are produced in China and meet high standards of quality, with external auditing to provide assurance to purchases. The manufacturer of solar photovoltaic (PV) panels has not yet been chosen, however for the purposes for the DCO it has been assumed that the panels would be transported by sea from China. While the panels would be sourced and shipped from China, UK manufacturers can supply many of the other components. In addition, as outlined in Comment Response SOC-03 provided as part of the Applicant's Response to Relevant Representations (Part 2) [AS-036], the local economy will benefit through the use of local businesses, such as accommodation, cafes 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.
Battery Safety				

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REP1-032; REP1-044; REP1-045; REP1-050; REP1-052	T-WR-BAT-01	Battery Safety	The BESS is said to present potential thermal-runaway, fire, explosion, toxic-smoke and vapour risks to nearby residents, wildlife and the environment. Respondents consider that the evidence is insufficient to conclude that there would be no unacceptable risk to human health or public safety.	The Applicant’s Outline Battery Safety Management Plan (oBSMP) [updated alongside this submission] has been submitted to fully accommodate the latest BESS safety requirements contained in NFPA 855 (2026) ensuring that any credible risks associated with battery storage are either prevented or fully mitigated if a BESS failure occurs. The oBSMP has been prepared for the Proposed Development using guidance from North Yorkshire Fire and Rescue Service (NYFRS) and incorporating recommendations of the National Fire Chiefs Council (NFCC). The oBSMP very clearly documents the fire and explosion protection requirements for the illustrative BESS design and the BESS system that is selected at the detailed design stage. Section 1.3.13 of the oBSMP stipulates: <i>“Final BESS design and site layout must be validated through mandatory Large Scale Fire Testing (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. Consequence modelling will quantify operational buffer zones for NYFRS to ensure Overhead Power lines will not impede incident response protocols; spacing will be agreed with NYFRS prior to construction of the BESS. NYFRS intervention in worst-case scenarios would typically be limited to boundary cooling of adjacent BESS and ESS units to prevent the fire from spreading. This strategy will be finalised in consultation with NYFRS prior to operation and be clearly communicated in the ERP, including measures:</i> 1) <i>To ensure that fire, smoke, and any release of toxic gases do not significantly impact site operatives, first responders, and the local community; and</i> 2) <i>To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite”.</i> Section 3 of the oBSMP comprehensively covers all BESS fire and explosion prevention, detection, and mitigation system safety requirements. Section 4 of the oBSMP covers all requisite firefighting considerations including, fire breaks, firefighting water containment, firefighting water supply requirements, all aspects of Emergency Planning including ERP and RM plan content templates, and summaries of Plume Study consequence modelling to validate BESS site location. Sections 4.5.5 – 4.5.12 of the oBSMP covers BESS drainage system requirements for pollution control these must be fully agreed with the Environment Agency who is a Statutory Consultee for the Proposed Development. LSFT involves deliberately burning a complete BESS enclosure to evaluate thermal exposure, heat release rates, burn duration, maximum

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				temperatures and, critically, the potential for fire propagation to adjacent BESS or associated equipment. The purpose of this testing is expressly to validate minimum equipment spacing and to demonstrate that cascading or multi BESS enclosure ignition does not occur where tested layouts and mitigation measures are implemented. These tests therefore explicitly address the type of multi BESS fire propagation risks, including scenarios observed in real world incidents, by requiring evidence that propagation risk is controlled through design rather than reliance on emergency intervention. Because the illustrative current BESS design utilised for OBSMP drafting and fire emission modelling demonstrated that a fire did not propagate during Large Scale Fire Testing (LSFT) the Applicant has demonstrated that the loss of a single BESS enclosure is a credible worst-case event for the safety and risk assessment documentation submitted for the DCO. Illustrative site design allows a separation distance of 2.5 m between BESS blocks and 3.5 m to ESS equipment, and 2.5 m between adjacent and back-to-back BESS enclosures. As now mandated under NFPA 855 (2026) the Applicant will only be able to select a BESS system that has undertaken LSFT. At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the OBSMP pre-construction requirements (Section 5). This will be developed and agreed with NYFRS. The implementation of the oBSMP is secured through a Requirement in Schedule 2 of the Draft DCO [updated alongside this submission]. This will stipulate that a Detailed BSMP will be submitted to and approved in consultation with NYFRS, the Environment Agency (EA), by North Yorkshire Council prior to the commencement of the works for the BESS. The Detailed BSMP will be substantially in accordance with this oBSMP [updated alongside this submission]. As recommended in National Fire Chiefs Council (NFCC) guidelines (2026) the Applicant has commissioned a Plume Analysis study presented in Environmental Statement Volume 3, Appendix 16.5: BESS Fire Emissions Modelling Technical Note [APP-187] to assess the environmental impact of a BESS thermal runaway incident to sensitive receptors within a 1 km radius of the potential BESS area, to assess the potential to cause air quality impacts during a BESS fire. Concentrations of carbon monoxide (CO), formaldehyde, hydrogen chloride (HCl), hydrogen cyanide (HCN), hydrogen fluoride (HF), ammonia (NH₃), nitrogen dioxide (NO₂) and particulates, were modelled using Atmospheric Dispersion Modelling Software (ADMS) to determine the effects of BESS fire emissions on human health. In line with NFCC recommendations, a high-

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				level visibility assessment has also been undertaken using the modelled particulates results to determine the effect of BESS fire emissions on visibility to the local road network. The Plume Study considers all toxic emissions at the peak of a BESS fire, all emissions at receptor locations were below all relevant public health exposure limit guidelines throughout the timeframe when the battery system of the indicative BESS design was fully consumed (burnt out). The modelling uses conservative assumptions, including: • Worst case BESS fire locations within the BESS area, positioned at the boundary of the BESS, closest to sensitive receptors; • Worst case release height, temperature and plume parameters; • Peak emission rates assumed to persist for extended durations (up to 8 hours) • The use of five years of hourly meteorological data, with the maximum predicted concentration extracted at each receptor, assuming the fire coincides with the poorest dispersion conditions; and • Assumption that Nitrogen Oxide (NO) converts fully to Nitrogen Dioxide (NO₂). Based on the factors of distance to the nearest locations of human exposure and the anticipated short-term nature of a fire incident, the assessment concludes that there would be no significant air quality or visibility effects as a result of a BESS fire incident. It should be noted that the assessment is deliberately conservative and therefore likely to overestimate, rather than underestimate, potential impacts. Smoke plumes generated in outdoor BESS fire scenarios can exit through explosion vents in the roof and gases will be transported above the affected BESS in a rising smoke plume. The plume will draw in (entrain) air which dilutes the toxic gases within the plume. Whilst certain toxic gases (including hydrogen fluoride) have a higher molecular weight than air, their behaviour in a fire scenario is governed primarily by release conditions (temperature, turbulence and vertical velocity), rather than molecular weight alone. In addition, hydrogen fluoride is highly reactive and readily interacts with atmospheric moisture, reducing its persistence and potential to accumulate in dangerous concentration levels at a significant distance from the fire source. Large Scale Fire Testing (LSFT) has illustrated that peak flame heights from BESS fire can be 10 metres above ground level which ensures that the generated toxic gas emissions within the smoke plume will decline

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				within the vertical uplift of the plume i.e. every 10m will significantly dilute toxicity. The smoke plume will move more horizontally as a result of the prevailing wind and are further diluted as the smoke plume travels downwind. A stronger wind ensures a more rapid dissipation of toxic gases. The Plume Study concludes that there are no significant impacts on sensitive receptors. Nonetheless, at the detailed design stage the Applicant will commission a BESS system and site-specific Plume Analysis study to assess the environmental impact of a site incident to sensitive receptors within a 1 km radius. Toxic gas emissions to sensitive receptors must be below relevant public health exposure limit guidelines when the battery system of a BESS is fully consumed (burnt out), production of Particulate Matter (PM) and a visibility impact assessment on any transport links within a 1 km radius of the BESS area will also be included. This is secured in Section 4.5.15 of the oBSMP.
REP1-032; REP1-033; REP1-044; REP1-050; REP1-052	T-WR-BAT-02	Battery Safety	The adequacy of emergency-response arrangements is questioned, particularly in a rural area. Respondents seek evidence on fire-service capacity and response times, access and egress, evacuation/public warning, and effective involvement of fire, environmental and safety bodies in assessing and controlling BESS risks.	The Applicant cross-refers to the response provided above Comment Reference T-WR-BAT-01 in regard to battery safety and the adequacy of emergency response arrangements in place for the Proposed Development. The Applicant notes that North Yorkshire Fire and Rescue Service (NYFRS) and the Environment Agency (EA) are statutory consultees and have been consulted as part of the pre-application consultation on the Proposed Development. NYFRS have been consulted during pre-application discussions and as part of statutory consultation, and engagement will continue across the project lifecycle to ensure that all key site safety and emergency response requirements are delivered. The safety objectives for the design of the BESS site are listed in Section 1.3.10 - 1.3.13 of the Outline Battery Safety Management Plan (oBSMP) [updated alongside this submission]. The Applicant has ensured site design is fully compliant with National Fire Chiefs Council (NFCC) guidance and has worked closely with NYFRS to address some site specific operational and access requirements for NYFRS. The BESS Compound will have a robust and validated Emergency Response Plan (ERP), developed in consultation with NYFRS. The ERP (template outlined in Section 4.4.4 of the oBSMP [updated alongside this submission]) 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. Final comprehensive risk assessment reports, BESS design and site-specific consequence modelling, and detailed Emergency Response Plans (ERPs) can only be drafted when based upon the specific BESS design selected at the detailed design stage. Key safety content requires that all equipment within the BESS area is defined, battery system operating limits and test data are fully defined, and the BESS failure protection system is

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				defined. Incident response tactics require significant test data and rigorous consequence modelling from the specific BESS design to develop safe protocols for incident response i.e. incident communication requirements and responsibilities, operational controls, etc. 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.
REP1-032; REP1-050; REP1-052	T-WR-BAT-03	Battery Safety	The proposed BESS location and separation from roads, homes and other sensitive receptors are considered inadequate, including concern that nearby receptors may fall within relevant debris, explosion or evacuation distances. Relocation or greater separation is requested.	The Applicant cross-refers to the response provided above Comment Reference T-WR-BAT-01 in regard to battery safety and the adequacy of emergency response arrangements in place for the Proposed Development. Explosion risk is the biggest threat to life and safety of first responders and BESS Compound layout and firefighting tactics will be designed to mitigate any risk. Many LSFT test programs do not performance test BESS active protection systems, therefore the Applicant has stipulated in Section 3.1.31 of the oBSMP [updated alongside this submission] that: “<i>any BESS explosion prevention or control/protection system will be validated through full scale BESS destruction testing, lean gas mixture testing and requisite pressure testing required by NFPA and EN standards. An independent Fire Protection Engineer specialising in BESS will review all UL 9540A test results and any additional fire and explosion test and modelling data which has been provided.</i>” NFPA 855 (2026) defines basic operation Health and Safety (H&S) protocols for all BESS site designs which should be incorporated into emergency response plans: 1) Potential debris impact radius is defined as 100 feet (ft) or 30.5 metres (m) i.e. this is a typical explosion risk safe exclusion zone radius as modelling and previous BESS incidents typically show 25 m to be maximum radius; and 2) Automatic building evacuation area is defined as 200 ft or 61 m from the affected BESS enclosure. The Applicant has selected the BESS compound location to ensure that there are no significant BESS failure impacts at any sensitive receptor locations. The Proposed Development will meet required safety objectives for explosion detection and protection systems specified in NFPA 855 (2026), explosion prevention and protection is now the primary BESS safety focus.

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				NFPA 855 incorporates in NFPA 68: Standard on Explosion Protection by Deflagration Venting and NFPA 69: Standard on Explosion Prevention Systems. Together, these standards provide comprehensive guidelines and standards to manage and mitigate explosion risks in BESS facilities. BESS equipment and site design compliance with NFPA 68 and NFPA 69 are crucial for protecting both site personnel and equipment from incidents relating to explosions, redundancy will be integrated into the selected BESS design.
REP1-032; REP1-050	T-WR-BAT-04	Battery Safety	The consent-stage BESS safety case is considered incomplete because key matters such as the selected chemistry/system, large-scale fire testing, final layout and spacing, consequence modelling and other hazard analyses are deferred to detailed design. Respondents seek objective consent-stage criteria and a regulatory/consultee framework capable of preventing a higher-risk final design.	The Applicant cross-refers to the response provided above Comment Reference T-WR-BAT-01 and T-WR-BAT-02 in regard to battery safety and the adequacy of emergency response arrangements in place for the Proposed Development. Section 1.3.1 of the Outline Battery Safety Management Plan (OBSMP) [updated alongside this submission] clarifies that: <i>“For the purposes of this oBSMP a concept design has been considered that uses a BESS system based upon Lithium Iron Phosphate (LFP) battery technology that is currently used on other solar projects being developed by the Applicant. This is considered a reasonable worst-case for the purposes of the assessment in terms of safety (toxic and explosive gas production risks”).</i> The Applicant emphasises that generalisations and claims regarding the safety of specific battery chemistries should be disregarded. Predictions of gas properties and volumes from a battery chemistry or form factor is unwise. Testing on actual BESS cells and battery systems is the only way to accurately define gas production which will inform the fire and explosion risk for a specific battery system.
REP1-032; REP1-045; REP1-050; REP1-052	T-WR-BAT-05	Battery Safety	Firefighting-water provision and contaminated firewater management are considered inadequately defined. Concerns include whether four hours of water is sufficient, replenishment and network supply, containment capacity, drainage isolation, groundwater/surface-water pollution, and arrangements for testing, treatment and safe disposal of contaminated water.	NFCC, NFPA, FSRI (Fire Safety Research Institute) guidance advises that hose streams should not be directly discharged on BESS battery systems. Claims that millions of litres of water are required to tackle a single BESS fire (as regularly referenced on internet forums) are incorrect, this type of assumption is based upon a two ground monitor units being deployed each discharging 1900 litres per minute for 24 hours, i.e. 5,472,000 litres of water directly on battery systems within a BESS enclosure. This tactic is not necessary and could create environmental pollution risks and significantly prolong any BESS fire event. If firefighters are applying water fog or spray patterns to adjacent BESS enclosures or deploying defensive spray plates that form a water curtain between the affected enclosure and adjacent BESS these “boundary cooling” tactics would likely be applied intermittently in 15-minute application periods with internal and external BESS temperature changes measured between application periods. The peak fire load for most current BESS designs when at 100% State of Charge (SOC) lasts for 1-3 hours and the rest of the fire involving the

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				battery systems, another 4-8 hours, would be at a lower intensity which reduces the impact of the fire. The maximum Peak Heat Release Rate (PHRR) occurs when propagation rate of battery cells is at peak level and decays to a smaller steady fire that is burning through fewer battery cells / modules and BESS system combustible materials and emitting significantly lower levels of flame and heat flux. Firefighter interventions in credible BESS failure scenarios would be limited to boundary cooling during a short-term peak fire load period. Because of the high levels of BESS internal thermal insulation which can maintain elevated temperatures for a significant timeframe, smouldering of other combustibles can continue long after the batteries have burnt out. This process does not pose any fire propagation risk or result in fire emissions that will have any off-site receptor impact. The Applicant’s Outline Battery Safety Management Plan (oBSMP) [updated alongside this submission] has been submitted to fully accommodate the latest BESS safety requirements contained in NFPA 855 (2026) ensuring that any credible risks associated with battery storage are either prevented or fully mitigated if a BESS failure occurs. The oBSMP has been prepared for the Proposed Development using guidance from North Yorkshire Fire and Rescue Service (NYFRS) and incorporating recommendations of the National Fire Chiefs Council (NFCC). The oBSMP very clearly documents the fire and explosion protection requirements for the illustrative BESS design and the BESS system that is selected at the detailed design stage. The Applicant’s oBSMP has been drafted to identify and address credible BESS failure hazards namely thermal (fire), overpressure /deflagration (explosion), and toxic emission (plume) hazards. In addition, the OBSMP addresses potential secondary BESS fire pollution issues i.e. water and soil contamination. As now mandated under NFPA 855 (2026) the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the OBSMP pre-construction requirements (Section 5). LSFT involves deliberately burning a complete BESS enclosure to evaluate thermal exposure, heat release rates, burn duration, maximum temperatures and, critically, the potential for fire propagation to adjacent BESS or associated equipment. The purpose of this testing is expressly to validate minimum equipment spacing and to demonstrate that cascading or multi BESS enclosure ignition does not occur where tested layouts and mitigation measures are implemented. These tests therefore explicitly address the type of multi BESS fire propagation risks, including scenarios

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				observed in real world incidents, by requiring evidence that propagation risk is controlled through design rather than reliance on emergency intervention. Because the illustrative current BESS design utilised for OBSMP drafting and fire emission modelling demonstrated that a fire did not propagate during Large Scale Fire Testing (LSFT) the Applicant has demonstrated that the loss of a single BESS enclosure is a credible worst-case event for the safety and risk assessment documentation submitted for the DCO. Illustrative site design allows a separation distance of 2.5 m between BESS blocks and 3.5 m to ESS equipment, and 2.5 m between adjacent and back-to-back BESS enclosures. Section 3.1.22 of the oBSMP [updated alongside this submission] stipulates that: <i>“LSFT of the selected BESS design to establish minimum equipment spacing distances and site-specific consequence modelling will provide a clear, evidence-based case for the final BESS Compound installation plans at the detailed design phase and will be agreed with NYFRS. An independent Fire Protection Engineer specialising in BESS will validate all UL 9540A, LSFT, and / or third-party test data and site-specific consequence modelling data which has been provided.”</i> Section 4 of the oBSMP covers all requisite firefighting considerations including, fire breaks, firefighting water containment, firefighting water supply requirements, all aspects of Emergency Planning including ERP and RM plan content templates, and summaries of Plume Study consequence modelling to validate BESS site location. Section 4.3.2 of the oBSMP stipulates that the BESS area will contain 4 hours water supply – 456,000 litres of water which is more than 2.5 times the volume recommended by NFCC guidance. Firefighting water will be stored in water tanks and will not be impacted by local drought conditions, which lead to water shortages. Section 4.3.2 of the oBSMP also stipulates: <i>“A BESS design which may require direct NYFRS firefighting engagement tactics will not be selected for this facility”</i>. Section 4.3.1 of the oBSMP confirms that: <i>“The firefighting water requirement will be fully assessed at the detailed design stage based upon analysis of LSFT of the BESS design plus any additional fire and explosion test data provided by an independent Fire Protection Engineer, water storage volumes will be fully agreed with NYFRS.”</i> Sections 4.5.5 – 4.5.12 of the oBSMP covers BESS drainage system requirements for pollution control these must be fully agreed with the Environment Agency who is a Statutory Consultee for the Proposed Development.

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				The implementation of the oBSMP is secured through a Requirement in Schedule 2 of the Draft DCO [updated alongside this submission] . This will stipulate that a Detailed BSMP will be submitted to and approved in consultation with NYFRS, the Environment Agency (EA), by North Yorkshire Council prior to the commencement of the works for the BESS. The Detailed BSMP will be substantially in accordance with the oBSMP [updated alongside this submission] .
Community Benefits				
REP1-037; REP1-045; REP1-051; REP1-052	T-WR-COM-01	Community Benefits	Respondents question whether local residents, farms and businesses will receive any direct benefit from the electricity generated or reductions in energy bills, and seek evidence for claims about powering homes or lowering household costs.	As per Comment Response COM-01 and COM-04 provided as part of the Applicant’s Response to Relevant Representations (Part 2) [AS-036] , the Applicant is committed to providing a Community Benefit Fund to allow the 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 energy cost for all, including locally.
REP1-042; REP1-044;	T-WR-COM-02	Community Benefits	Community-benefit commitments and any community fund should be clearly defined, transparent, enforceable and independently monitored. Respondents seek publication of community-benefit payments and clarity on local job assumptions and the extent to which voluntary benefits are relied upon in the planning balance.	As per Comment Response COM-02 provided as part of the Applicant’s Response to Relevant Representations (Part 2) [AS-036] , the Community Benefit Fund sits separately from the DCO process as community benefits do not form part of the balance. If the Proposed Development is consented, the Applicant will develop a formal mechanism for managing community benefit funding as part of its pre-construction activities. This will be informed by comments from community stakeholders.
Consultation and Engagement				
REP1-035; REP1-037; REP1-043; REP1-045; REP1-052; REP1-054	T-WR-ENG-01	Consultation and Engagement	Consultation and engagement are considered inadequate, unresponsive and insufficiently accessible, including unclear mapping/publicity material, missed or inconsistent mailings, short notice, the absence of a South Milford event and hearing dates that limited attendance; unanswered questions, limited one-to-one dialogue, late responses and inadequate follow-up; and consultation/application material that respondents found difficult to understand due to technical language, document presentation, repeated errors and, separately, the use of AI in preparing planning material. Respondents say these issues have reduced confidence in the Applicant’s assurances and its ability to manage future impacts.	As per Comment Response ENG-02 provided as part of the Applicant’s Response to Relevant Representations (Part 2) [AS-036], the Applicant respectfully disagrees with the comment. The Applicant committed to publicising all phases of consultation, utilising methods set out within the Statement of Community Consultation (SoCC). Consultation information events were held across different days of the week and covered a range of times to accommodate different working hours and care scheduled to promote accessibility and attendance. The SoCC also detailed measures which enabled meaningful participation and ensured accessibility to the consultation process, including through encouraging anyone who may require consultation materials in alternative formats, such as large-print, audio or braille, to get in touch with the Proposed Development via the Proposed Development communication channels to request these materials. The Phase Two consultation leaflet (see Consultation Report Appendix 6: Phase Two Consultation Materials [APP-030 to APP-031]) sets out that two consultation events were hosted in Monk Fryston and Sherburn-in-Elmet, both of which are in close proximity to South Milford, allowing residents to attend either of the two nearest events, or the community webinar if unable to attend the in-person consultation events.

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				The full SOCC is included within the Consultation Report Appendix 4: Statement of Community Consultation Materials [APP-028] .
REP1-042	T-WR-ENG-02	Consultation and Engagement	How many objections have been received from residents? How has community feedback changed the project? Which parts of the project have been altered following objections?	During pre-application, the Applicant undertook multiple phases of consultation with communities close to the Proposed Development, and the design has evolved throughout the development lifetime. This is evidenced within Environmental Statement Volume 1 Chapter 3: Alternatives and Design Iteration [updated alongside this submission]. Details of the feedback received during pre-application consultation undertaken by the Applicant can be found the Consultation Report [APP-024]. This includes details on the number of objections received through quantitative analysis (Chapter 12 of the CR). Chapter 0 of the CR, the Executive Summary, includes a summary of how the Applicant had regard to relevant consultation responses which influenced the design submitted as part of the DCO Application. This included the removal of Site 5, size reduction of the Proposed Development in line with the mitigation hierarchy to avoid, reduce, and mitigate adverse impacts, and a commitment to protecting birds and delivering habitat mitigation and enhancement through a dedicated bird mitigation area at Site 1. The Applicant notes that the purpose of pre-Application consultation was not to formally collect objections or statements of support, instead the Applicant asked for feedback on the proposals for the Proposed Development as they were at each phase of consultation. Feedback was requested to help refine the development of the design proposals. However, at both Phase Two consultation and during the Relevant Representation period, the Applicant recorded 155 and 386 submissions respectively where respondents had stated that they objected to the Proposed Development.
REP1-043	T-WR-ENG-03	Consultation and Engagement	Sites 6–8 were added later and respondents question whether affected communities received adequate consultation and whether changes in receptors, survey requirements and assessment assumptions were transparently addressed.	As per Comment Reference ENG-09 within the Applicant's Response to Relevant Representations (Part 2) [AS-036] , the Applicant respectfully disagrees with this comment. Sites 6, 7 and 8 were part of the proposals for the Proposed Development consulted on at statutory consultation (Phase Two).

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REP1-037	T-WR-ENG-04	Consultation and Engagement	Concern is raised about the adequacy of engagement with local authorities, parish councils and local communities, including an alleged failure to involve or respond to some statutory/community consultees and a perceived loss of local democratic involvement.	As per Comment References ENG-02 and ENG-06 within the Applicant’s Response to Relevant Representations (Part 2) [AS-036], 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]. The Consultation Report [APP-024] sets out the Applicant’s approach to pre-application consultation. The Applicant disagrees with the statement that there has been a failure to involve or respond to some statutory / community consultees. All feedback has been considered by the Applicant and responded to within the Consultation Report Appendix 11: Section 47 Application Response Table [APP-036]. As well as the Applicant Response Table showing how feedback has been considered and how it may have influenced the design, the table also includes a column stating whether a piece of feedback has resulted in a change to the Proposed Development design or the Applicant’s evidence. In addition, the Applicant can confirm that any Relevant Representations submitted by the local community or statutory and political stakeholders have been received by PINS as the Examination Authority for the Proposed Development. The Applicant is responsible for providing responses to all submissions. This means that, due to the volume of Relevant Representations submitted by the public, concerns, queries and feedback raised through these submissions have been split by topic / theme, with repeated points grouped together, as can be seen in this document. While this does mean that, for text included in the ‘Summary of Issue Raised’ column, the wording may have changed, these are meant to be summaries of points raised rather than verbatim which may reflect the concern that some feedback has been missed.

3 The Applicant’s Response to members of the public – Detailed comments

Reference ID	Comment Reference	Interested Party	Theme	Summary of Issue Raised	Applicant's Response
General Feedback					
REP1-054	D-WR-GEN-01	Wendy Tomlinson	General Feedback	I include this to explain why proper, funded professional involvement and clear communication are important. I am doing my best to present the facts, but I should not be expected to interpret complex legal and technical documents without appropriate help. The Applicant’s response remains general and does not adequately address the site-specific effects on Field House Farm, including access duration and intensity, business and security impacts, vegetation retention, and disturbance to the active Barn Owl territory. The absence of even an indicative programme also prevents effective business planning and advance warning to customers. These matters remain unresolved and reinforce the concerns set out in this Written Representation.	As per Comment Response SOC-20 within the Applicant’s Response to Relevant Representations (Part 2) [AS-036], Field House Farm has been assessed within ES Volume 1, Chapter 13: Socioeconomics [updated alongside this submission]. ES Volume 3, Appendix 13.1: Socioeconomic Receptors Impact Assessment [APP-177] outlines the assessed impacts of the Proposed Development on this receptor, considering all impact pathways. Overall, the impacts to the receptor (from a variety of potential impacts) is considered minor adverse and not significant, and therefore unlikely to affect the viability of the business. Prior to commencing any works on-site, the Contractor(s) will develop and implement a Stakeholder Communications Plan that includes community engagement and will detail a complaints procedure. As part of this a Community Liaison Officer (or alternative) would be appointed to lead discussions with the local community during construction. Details of the frequency and attendees to the Community Liaison Group will be agreed with the local planning authority pursuant to a requirement in the draft DCO [updated alongside this submission]. The Applicant has also updated the outline CEMP at Deadline 2 to make a specific commitment to engage with Mrs Tomlinson in respect of managing impacts to Field House Farm, noting that they are limited to access taken by HGVs on an adjacent track during the construction phase only (as Field House Farm is otherwise located approximately 500 meters away from the Cable Route Corridor – therefore, in terms of where the Order Limits are closest to the property, this is purely for access to the Cable Route Corridor, and that there would be minimal impacts from cable construction itself to the property, given the distance and intervening vegetation).
REP1-054	D-WR-GEN-02	Wendy Tomlinson	General Feedback	I do not believe I have yet been given enough clear and consistent information to understand exactly what Light Valley Solar wishes to do with the Field House Farm lane and adjoining land, or why our house and land were highlighted in the targeted consultation material if the house was not part of the scheme. The relevant information is spread across numerous plans, schedules, legal documents and technical reports, with some matters appearing to remain indicative, optional or subject to later design, rather than being presented in one clear and coordinated explanation. The Applicant’s formal response describes the access as temporary and linked only to cable construction, but also refers elsewhere to	The house of Field House Farm was not included as part of the land subject to targeted change in the Targeted Consultation carried out in October 2025. The property was labelled on maps produced by the Applicant, using background mapping that included the name of the property to assist orientate consultees. For example, see Change 5 (pdf pg. 24 of [APP-034]). Whilst Change 5 and the Order Land does not include the house at Field House Farm, it does intersect with land within the respondents title to the north-west of Field House Farm at Plots 03-009 and 03-010. Change 5 and the Order Land also includes unregistered land in which the respondent is referenced as the reputed owner in plots 03-008 and 03-008a, whilst a Caution against title has been included in plots 03-008a and 03-014.

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				maintenance and decommissioning. The draft licence refers to abnormal loads and a wide range of possible works to the route and my property. These differences need to be explained clearly and in plain English.	The Applicant can confirm that the rights sought across Plots 03-005, 03-005a, 03-006, 03-007, 03-008, 03-008a, 03-009, 03-010, 03-011 are temporary in their nature. The access from Skipwith Road, travelling past Field House Farm is to be used during the construction phase. Originally, the Applicant had considered that these rights would be required permanently, intended for operational purposes post construction, but can confirm that only construction access is required. This is explained further in other Deadline 2 submissions and the Land Plans [updated alongside this submission] and Book of Reference [updated alongside this submission] have been updated to reflect this The Applicant would welcome the opportunity to meet with Mrs Tomlinson/her agent to support them in finding the relevant information and explaining the rights sought, the associated impact, with the hope to progress the voluntary agreement.
The Proposed Development					
REP1-032	D-WR-DES-01	Annette Exley	The Proposed Development	The land position is markedly uneven. The Applicant's Grid Connection Statement records that voluntary Option to Lease Agreements have been entered into with the landowners of the Solar Development Sites. In respect of the Cable Route Corridor, by contrast, it records only that Heads of Terms have been issued to each affected landowner and that negotiations will continue. Heads of terms are not agreements. The Applicant therefore holds secured rights over the generating land and, on its own account, unsecured rights over the 328.5 hectares of cable corridor through which the entire output of the scheme must pass.	The Applicant acknowledges that Heads of Terms are not legally binding, however, as noted within the Land and Rights Negotiation Tracker [updated alongside this submission] which is regularly updated during Examination, once Heads of Terms are agreed legal representatives are instructed to progress the legal documentation. It is the Applicants preference and intention to secure the rights sought through the voluntary forum and that the use of Compulsory Acquisition powers will always be the last resort. Compulsory acquisition powers are primarily reserved for those areas where it is not possible to negotiate and agree the rights sought, such as unregistered land where the freeholder is not known, or they are not able to prove title.
REP1-032	D-WR-DES-02	Annette Exley	The Proposed Development	I do not object to compulsory acquisition as a matter of principle. I object to it being authorised over a corridor whose route is not finally fixed, for a scheme whose grid connection status is not disclosed, in favour of a company whose continued involvement is not guaranteed.	The Cable Route Corridor is predominantly fixed and the Applicant has explained in its Optionality Note at Deadline 2 the reasons for where there is optionality. This corridor has been developed pursuant to the arrangements set out in the Grid Connection Statement [APP-222] which explains that the Proposed Development has an agreement with NESO (the National Energy System Operator) for the import and export of up to 500MW to the National Electricity Transmission System at National

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					Grid’s Monk Fryston substation. The Statement of Need [APP-214] explains that, as part of NESO’s connections queue reforms, the solar component of the Proposed Development has been notified of its status as a prioritised Gate 2 scheme with connection in 2030 or earlier. The BESS component of the Proposed Development holds a Gate 1 connection offer, the indicative connection date of which has not yet been confirmed. The Applicant holds the benefit of the DCO. This would only be able to be transferred to another body with the Secretary of State’s consent (with limited exceptions).
REP1-046	D-WR-DES-03	Ms Susan Joy Tasker	The Proposed Development	The proposed 13 miles of ‘cable pipeline’ will presumably be designed to hook into further expanses of solar panels in the future; this would indicate that this predominantly rural area, from Escrick to Monk Fryston, could become one of largest industrial power complexes unless of course there is proper binding controls written in to any permissions granted.	The Applicant notes this concern. 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.
REP1-044	D-WR-DES-04	Louise Billingham	The Proposed Development	Concern is raised that changes to regional solar targets following engagement between Macquarie/Island Green Power and Government may have influenced the national-need case relied upon for the scheme.	Section 3.8 of the Statement of Need [APP-214] explains that the government has acted to ensure the grid needed for the system in 2030 and beyond can be put in place. The government has instigated reform of the grid connections process to prioritise projects needed for 2030, while maintaining a robust pipeline of projects beyond 2030, by setting challenging capacity ranges for all low-carbon technologies for 2030 and for 2035. However, Section 4.2 of the Statement of Need also explains that the government “does not consider it appropriate for planning policy to set limits on different technologies but planning policy can be used to support the government’s ambitions in energy policy and other policy areas” (NPS EN-1, Para 3.2.4), and that the Capacity Ranges included in the Clean Power 2030 Action Plan are not intended to propose limits on any new infrastructure that can be consented (NPS EN-1, Para 3.2.6) NPS EN-1 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 project to be satisfied that need is established (NPS EN-1, Paras 3.2.8 to 3.2.10). It is therefore clear that the urgent need for the Proposed Development (and other low-carbon generation schemes) is firmly established in national policy, and the Clean Power 2030 Capacity Ranges do not restrict or limit that need.. No evidence has been provided that the meeting referenced concerned the merits of the Proposed Development’s Application, sought to influence the outcome of the decision-making process, or resulted in any preferential treatment.

Reference ID	Comment Reference	Interested Party	Theme	Summary of Issue Raised	Applicant's Response
					A meeting in January 2025 between DESNZ officials, the Applicant and Macquarie took place in the context of the Department of Energy Security and Net Zero's (DESNZ) wider policy and delivery responsibilities relating to electricity network infrastructure and the connection of solar and BESS projects to the transmission system. Engagement between DESNZ officials, the Applicant and Macquarie on grid connection matters is consistent with the wider engagement that routinely takes place between government departments, developers, investors, network operators, and other stakeholders in relation to electricity network connections and reform, and does not in itself indicate bias, predetermination or preferential treatment. The Applicant notes that the assertions made in this submission regarding the meeting are speculative and are not supported by evidence of bias. NESO has also commented publicly: "NESO rejects any suggestion that its independent analysis or advice has been influenced by any individual developer. We engage regularly with stakeholders across the energy sector, but that engagement does not unduly influence NESO's objective advice or assessments". The Planning Act 2008 process includes safeguards intended to ensure that applications for development consent are considered fairly and on the basis of the evidence before the decision maker. The grid connection for the Scheme, including its connection date, secured agreement and timelines are contained within the Grid Connection Statement [updated alongside this submission].
REP1-037	D-WR-DES-05	Ian Curran	The Proposed Development	The suitability and efficiency of the proposed technology is questioned, including the limited duration of BESS grid support.	Section 7.7 and Section 7.8 of the Statement of Need [APP-214] provide detail on the suitability and efficiency of large-scale solar schemes. Sections 6.11 and Section 7.9 of the Statement of Need [APP-214] provide detail on the role of co-located electricity storage in supporting the operation of the main solar scheme. Chapter 8 of the Statement of Need [APP-214] provides detail on the suitability of the proposed location for large-scale solar. In conclusion, the Proposed Development is coming forward to make a meaningful contribution towards achieving the government's Clean Power capacity ranges, so supporting decarbonisation of the electricity system while enhancing the security of supply and affordability of electricity for UK consumers, while maximising use of existing and available grid infrastructure. In this regard, the Proposed Development is fully aligned with the government's energy policy.

Reference ID	Comment Reference	Interested Party	Theme	Summary of Issue Raised	Applicant’s Response
Construction and Decommissioning					
REP1-054	D-WR-CON-01	Wendy Tomlinson	Construction and Decommissioning	Future Management Arrangements The Applicant refers to future traffic-management arrangements, a Stakeholder Communications Plan and a Community Liaison Officer. However, no detailed arrangements specific to Field House Farm have yet been provided. This is particularly concerning because the agreed notification process has already failed on several occasions during the survey stage, as recorded in Appendix G. It is therefore not sufficient simply to state that concerns will be managed later.	As per the Applicant’s response to WR-SOC-20 within the Applicant’s Response to Relevant Representations (Part 2) [AS-036], Field House Farm has been assessed within ES Volume 1, Chapter 13: Socioeconomics [updated alongside this submission] and ES Volume 1, Chapter 10: Landscape and Visual [APP-048]. The assessments conclude that impacts are not expected to be significant and are unlikely to affect the viability of the business. As detailed within the response to SOC-20, the outline Construction Environmental Management Plan (oCEMP) [updated alongside this submission] sets out arrangements for the management of environmental impacts and community concerns. Additionally, traffic-related impacts will be managed through the outline Construction Traffic Management Plan (OCTMP) [updated alongside this submission]. The Applicant has updated both the OCEMP and OCTMP to make specific commitments to engage with the respondent.
REP1-054	D-WR-CON-02	Wendy Tomlinson	Construction and Decommissioning	How would gates, beams, fencing, screening and controlled access remain operational?	Details of the management of security arrangements during construction, such as gates and fencing, are set out in the outline Construction Environmental Management Plan (oCEMP) [updated alongside this submission]. Additionally, the outline Operational Environmental Management Plan (oOEMP) [updated alongside this submission] makes provisions for maintenance of security features during the operational life of the Proposed Development. These measures will be detailed in the full CEMP and OEMP approval of which, by NYC, is secured under requirements 12 and 13 in the draft Development Consent Order [updated alongside this submission]. The Applicant can further discuss security and controlled access with affected parties. Additionally, as detailed in the outline Construction Environment Management Plan [updated alongside this submission], a Community Liaison Officer will be appointed to lead discussions with local communities (and with individuals such as Mrs Tomlinson) and also act as the primary point of contact should there be any queries or complaints, including in relation to matters of interactions with existing fencing and security features.

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REP1-031	D-WR-CON-03	Annabel Amy	Construction and Decommissioning	Concern is raised over the scale of the cable construction corridor between Escrick and Monk Fryston, including whether the working corridor could be up to 50 m wide and the resulting effects on fields, hedges, roads and rivers.	As per Comment Response GEN-04 within the Applicant's Response to Relevant Representations (Part 2) [AS-036], for the open cut sections of the Cable Route Corridor, the working width for installation of the cable is anticipated to be 25m. This may be widened in places and narrowed in others, for example to minimise removal of hedgerows or at open cut watercourse crossings. The working width will include a temporary haul road along which vehicles and plant will be located, as well as an area for temporary storage of excavated materials. In addition, as per Comment Response CON-01, the likely significant effects of the Proposed Development during the construction phase are assessed throughout the ES, including effects on traffic and transport, noise and vibration, air quality, landscape and visual amenity, ecology and local communities. This includes an assessment of the Cable Route Corridor. Further detail can be found in the Technical Note on Plot Sizing [EN0110012/APP/LVS/08.14] submitted for Deadline 2. The typical 50 m width of the Cable Route Corridor is sufficient to site cable works to minimise or avoid interaction with these constraints. Where environmental and technical work has identified that portions of the Cable Route Corridor are particularly constrained, the Cable Route Corridor is broader to allow flexibility in the detailed design to minimise or avoid interaction with these constraints.
Alternatives and Design Iteration, and Site Selection					
REP1-032	D-WR-ALT-01	Annette Exley	Alternatives and Design Iteration, and Site Selection	The adequacy of the reasonable alternatives assessment and site-selection process is questioned. Concerns include the approximately 25 km search area, the role of the Monk Fryston grid connection, the environmental criteria applied or relaxed, consideration of alternative connection points/capacities and smaller or differently configured schemes, and whether the assessment meets the EIA requirement to explain the main reasons for the option chosen.	The Applicant has carried out a comprehensive assessment of alternatives as set out in its Site Selection Assessment Report [AS-019], which explains the search area, the importance of the grid connection and the environmental criteria applied. The Applicant considers that its site selection assessment adequately meets the requirement to include information on reasonable alternatives in the Environmental Statement, together with the relevant planning policy on alternatives and site selection set out in NPS EN-1 and NPS EN-3 (notably NPS EN-1 paragraphs 4.3.22 - 4.3.29). With regard to the 25 km search area, this was considered by the Applicant to be a viable cable connection distance for a solar project of this scale. As noted at page 12 of the Written Summary of the Applicant's Oral Submissions (Issue Specific Hearing 1) [REP1-004], the Applicant's approach is consistent with, and in some cases more comprehensive than, approaches adopted on other Schemes (such as One Earth Solar which adopted a 10km then 15km search area). As to the role of Monk Fryston substation, the availability of a grid connection at Monk Fryston was central to the search area adopted for site selection. Section 3.8 of the Statement of Need [APP-214] explains that the government has established challenging capacity ranges for low-carbon generation technologies to deliver and sustain a clean power

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					system while electricity demand grows on the pathway to net zero by 2050. Section 3.7 of the Statement of Need [APP-214] explains that grid connection is a major bottleneck to delivering those capacity ranges (and beyond). Therefore, the Applicant is proposing a scheme which maximises use of the available grid connection secured at National Grid’s Monk Fryston substation. Utilising Monk Fryston as the point of connection is therefore aligned with the government’s plans for delivering Clean Power at an unprecedented pace and scale. Regarding the scale of development, for the reasons mentioned above, to deliver a smaller scheme than that which the Applicant has assessed as acceptable in the planning balance, leaves a vital national commodity (i.e. an available grid connection) underutilised. Regarding the environmental criteria ‘applied or relaxed’, the Applicant has taken a staged approach to site selection, in line with relevant planning policy, to first consider the least environmentally constrained land before reintroducing areas of more constrained land into the areas of search. For example on agricultural land, the Applicant initially focussed its site selection on lower grade agricultural land by excluding higher grade land (grade 1, 2 and 3) from its area of search. The Applicant identified four potential development areas (PDAs) on lower grade agricultural land, but none of those PDAs were suitable for development for the reasons set out in the Site Selection Assessment Report (SSAR) [AS-019]. It was therefore necessary to extend the search to include higher grade agricultural land.
REP1-032	D-WR-ALT-02	Annette Exley	Alternatives and Design Iteration, and Site Selection	The current status and timing of the grid connection are considered insufficiently clear. Respondents seek confirmation of the original contracted connection date, the effect of connections reform, the project’s Gate 1/Gate 2 status and any revised connection date, and the implications for need and deliverability if the connection position is unresolved or delayed.	The Grid Connection Statement [APP-222] explains that the Proposed Development has an agreement with NESO (the National Energy System Operator) for the import and export of up to 500MW to the National Electricity Transmission System at National Grid’s Monk Fryston substation. The Statement of Need [APP-214] explains that, as part of NESO’s connections queue reforms, the solar component of the Proposed Development has been notified of its status as a prioritised Gate 2 scheme with connection in 2030 or earlier as a result of having a contracted connection date of 2030 or earlier. The BESS component of the Proposed Development holds a Gate 1 connection offer, the indicative connection date of which has not yet been confirmed. The Applicant confirms that prior to the connections reform process, the contracted connection date for both the solar and BESS elements was December 2029. The Applicant knows of no reason why the connection position should not be confirmed or should be delayed. The Applicant is aware of the significant amount of work required to connect low-carbon generators to the grid to meet the Government’s clean power capacity ranges. Therefore, any delays to any schemes (such as the Proposed Development) re-prioritised in NESO’s connections reform process increase the need for other schemes to come forward with greater urgency to decarbonise the grid and secure UK electricity supplies.

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REP1-032	D-WR-ALT-03	Annette Exley	Alternatives and Design Iteration, and Site Selection	Further evidence is requested on the availability and capacity of the Monk Fryston connection, including whether the spare 275 kV bay remains available, whether the scheme depends on Yorkshire Green reinforcement, and what additional network reinforcement may be required.	It is the Applicant’s understanding that in providing a connection offer to an electricity generator, National Grid are required to carry out robust analysis to ensure that anticipated power flows from the generator can be accommodated as per the connection agreement, alongside the work that NGET itself is doing to its network. The Applicant understands that National Grid have carried out this analysis and that has resulted in the connection agreement being offered and accepted. NESO’s re-prioritisation of the Scheme as a Gate 2 Phase 1 project further supports that the grid local to the Scheme can accommodate the Scheme as proposed.
REP1-032	D-WR-ALT-04	Annette Exley	Alternatives and Design Iteration, and Site Selection	There is a further matter arising from the Grid Connection Statement which affects the assessment more widely. The Statement records that 275kV substations are proposed on both Site 2 and Site 4, that the high voltage cable would run approximately 4.9 kilometres from the Site 4 substation to Monk Fryston, and that the cable may extend a further 3 kilometres to the Site 2 substation should that be determined to be the most efficient design. The principal electrical configuration of the scheme is therefore not fixed. Two alternative arrangements remain open, and which is adopted will be determined after consent. That has consequences for the environmental assessment. Where the location and role of the primary substation is undetermined, the assessment of landscape, noise, flood risk and land take at each of Sites 2 and 4 must necessarily proceed on assumptions. The Examining Authority should satisfy itself that the Environmental Statement has assessed the realistic worst case for both configurations, at both sites, and not the more favourable of the two. I note in this connection that North Yorkshire Council’s submission of 7 July 2026 addressed the substation and battery infrastructure on Site 2. The implications of a 275kV substation on Site 4, on the northern edge of the River Aire, appear to have received considerably less scrutiny.	The Applicant notes this. 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. ES Volume 1, Chapter 2: The Proposed Development [updated alongside this submission] and the Design Parameters and Commitments document [updated alongside this submission] sets 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. This includes the design parameters for the Substations. The realistic worst case for each Substation has been assessed for each and every topic recognising 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. When the detailed design for the Proposed Development is submitted for approval to the relevant planning authorities, those details must accord with the Design Parameters and Commitments document [updated alongside this submission] This ensures that the environmental effects (of the detailed design) would be the same as, or no worse than, those assessed and reported in the ES The Applicant’s approach is consistent with DCO practice for all project types.
REP1-033	D-WR-ALT-05	Eliot Grant	Alternatives and Design Iteration, and Site Selection	Concerns expressed regarding the proximity and siting of the proposed BESS and solar infrastructure in relation to nearby residential receptors, including potential operational noise, glint and glare, BESS fire and safety risks, associated air quality effects in the event of a fire,	Table 3-6 of ES Volume 1, Chapter 3: Alternatives and Design Iteration [updated alongside this submission] outlines the BESS location design parameters that were taken into account in determining the BESS location. 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 location of the BESS within Solar Development Site 2 was

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				and the safety implications of the BESS location in relation to nearby roads and properties.	selected to optimise separation from surrounding receptors and reduce potential adverse impacts, including to residential properties. The ES Volume 1, Chapter 11: Noise and Vibration [APP-049] provides an assessment of the operational noise of the Proposed Development, supported by ES Volume 3, Appendix 11.3: Operational Noise and Vibration Assumptions and Results [APP-100] and ES Volume 2, Figure 11.3: Operational Noise Modelling Results [APP-100]. This includes an assessment of the BESS infrastructure and demonstrates that operational noise levels, taking into account the BESS and other fixed infrastructure, would comply with relevant guidance and would not give rise to significant adverse effects at nearby receptors. In addition, ES Volume 1, Chapter 11: Noise and Vibration [APP-049] includes a host of mitigation measures to reduce the impacts of the BESS compound. These include plant orientation to minimise the sound producing equipment facing sensitive noise receptors, and the implementation of up to 5 m high noise barriers around and within the BESS site. The ES Volume 1, Chapter 16 Other Environmental Matters and ES Volume 3: Appendix 16.4 [updated alongside this submission] present an assessment of potential glint and glare effects on residential properties. This concluded that temporary significant impacts were predicted on a number of dwellings without advanced planting in place. With additional mitigation in place in the form of advanced planting, it is assessed that any significant glint and glare issues would be mitigated and not significant. The need for, and details of, the proposed advanced planting will be subject to re-assessment at detailed design and this is secured through the oCEMP [updated alongside this submission] and oLEMP [updated alongside this submission]. The Applicant’s Outline Battery Safety Management Plan (oBSMP) [updated alongside this submission] 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. Regarding proximity of the BESS to nearby residential receptors ES Volume 3, Appendix 16.5: BESS Fire Emissions Modelling Technical Note [APP-187] assesses the battery fire emission impact and concludes that based on the factors of distance to the nearest locations of human exposure and the anticipated short-term nature of a fire incident, 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, including residential receptors.

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REP1-042	D-WR-ALT-06	Kim Jones	Alternatives and Design Iteration, and Site Selection	What disruption should Wistow residents expect during cable installation? How long will works near Wistow last?	As shown on the Works Plans [AS-004] around the Wistow area would be the construction of the Cable Route Corridor and works to facilitate temporary construction, maintenance and decommissioning access. Long Lane and Pinfold Hill are identified as routes for Abnormal Indivisible Loads (AILs) only. These movements would be limited in number and undertaken on an infrequent basis. AIL movements are subject to a separate approval and permitting process, requiring coordination with and approval from the relevant authorities, including North Yorkshire Council and the police, to ensure that they are undertaken safely and with appropriate traffic management measures in place. The Applicant recognises the sensitivity of local receptors in Wistow, including locations such as Pinfold Hill where on-street parking and school-related activity takes place. Construction traffic using other roads, for example Lordship Lane, will be managed to minimise interaction with peak local activity where practicable, and appropriate traffic management measures will be implemented where required to ensure the safe movement of vehicles and protection of road users. The conclusions of the Transport Assessment (TA) [updated alongside this submission] 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. Construction phase information is included within Section 2.7 of ES Volume 1, Chapter 2: The Proposed Development [updated alongside this submission] including an indicative construction programme.
REP1-053; REP1-054	D-WR-ALT-07	Wendy Tomlinson	Alternatives and Design Iteration, and Site Selection	The selection of the Field House Farm access is disputed because less harmful northern, southern and other route options are said to exist. Respondents seek a transparent comparative assessment of route criteria, surveys, traffic and physical constraints, temporary haul-road options and effects on homes, businesses, agricultural land and existing infrastructure, together with clear justification for rejecting alternatives.	The Applicant notes this comment. The construction access strategy was developed following consideration of a range of operational, environmental and highway factors. Further information regarding the assessment of alternative access routes was provided at Deadline 1 and is included in Appendix A of the Written Summary of Applicant’s Oral Submissions at CAH1 [REP1-005] .
Green Belt					

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REP1-032	D-WR-ALT-08	Annette Exley	Green Belt	I note that if any part of the Green Belt land in question carries infrastructure of the scale described by North Yorkshire Council in relation to Site 2, being a substation compound of up to 3.5 hectares with structures to 13 metres and a battery compound of up to 10.5 hectares with a 5 metre acoustic barrier, the characterisation of that development as not inappropriate would require careful scrutiny.	The Applicant notes this comment. The Applicant has carried out a full review of the Green Belt assessment with reference to the newly published NPPF (August 2026). SDSs 2, 3 and 4, and temporary Construction Compound 5 on CRC 4-POC are partly or wholly within the Green Belt. However, the Proposed Development is demonstrably located on grey belt land and meets the test for being ‘not inappropriate’ in the grey belt. As such, the Proposed Development is acceptable in the Green Belt, and the test of Very Special Circumstances is not engaged. North Yorkshire Council confirmed that they agreed with the Applicant’s approach to grey belt within Issue Specific Hearing 1, as documented within Transcript of Issue Specific Hearing 1 (ISH1) - Part 2 [EV5-005]. For further information on grey belt land, please refer to the Planning Statement, section 7.5 [updated alongside this submission].
Cable Route					
REP1-042	D-WR-ALT-09	Kim Jones	Cable Route	Cable route and infrastructure Why was the cable route selected through this area instead of alternative routes? How will damaged roads, verges and footpaths be restored?	Details of the evolution of the Cable Route Corridor (CRC) and the reasons for its location are set out in ES Volume 1, Chapter 3: Alternatives and Design Iteration [updated alongside this submission]. The primary aim was to find the most direct alignments between the Monk Fryston Substation and the Solar Development Sites and between each of the Solar Development Sites. This would represent the most operationally efficient route and would be expected to result in fewer impacts and a shorter construction period. The final alignment of the CRC has been informed by constraints including agricultural land and soils, landscape and visual effects on public rights of way and residential receptors, and disturbance to local roads. Following the installation of the cables the construction working area, including roads, verges and footpaths, would be fully reinstated back to its original condition. With specific regard to road infrastructure and public footpaths, ES Volume 1, Chapter 14: Traffic and Movement [updated alongside this submission] includes a host of mitigation measures including the implementation of an Outline Construction Traffic Management Plan (oCTMP, [updated alongside this submission]) 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.

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					Additionally, construction activities affecting pedestrian routes would be temporary and managed, as detailed in the oCTMP [updated alongside this submission] . 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.
Climate Change Resilience and Greenhouse Gas Emissions					
REP1-032	D-WR-CLI-01	Annette Exley	Climate Change Resilience and Greenhouse Gas Emissions	I note that in respect of greenhouse gas emissions the Applicant states that a cumulative assessment is considered inappropriate because the receptor is the global climate. Whatever the merit of that position for emissions, it should not be permitted to set a precedent for the treatment of cumulative effects on receptors which are emphatically local, namely residents, the highway network, the landscape and the water environment.	The Applicant notes concerns raised for the local area with regards to Greenhouse Gas (GHG) Emissions. ES Volume 1, Chapter 9: Greenhouse Gas Emissions [APP-047] assesses the greenhouse gas (GHG) 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]. Section 9.14 of ES Volume 1, Chapter 9: Greenhouse Gas Emissions [APP-047] provides the rationale, aligning with industry guidance and best practice, as to why a cumulative assessment has not been undertaken for the GHG emissions assessment. Namely, the industry guidance from the Institute of Sustainability and Environmental Professionals (ISEP) guidance (previously IEMA) states "effects from specific cumulative projects...should not be individually assessed, as there is no basis for selecting any particular (or more than one) cumulative project that has GHG emissions for assessment over any other". Nevertheless, a robust cumulative assessment for other topics has been undertaken by the Applicant, which considered cumulative socioeconomic, traffic and transport, landscape and water impacts. This is detailed within the relevant chapters of the Environmental Statement and summarised within ES Volume 1, Chapter 17: Cumulative and In-Combination Effects [updated alongside this submission].
REP1-034 REP1-044	D-WR-CLI-02	Gary Philip Yeadon Louise Billingham	Climate Change Resilience and Greenhouse Gas Emissions	Respondents have expressed concern about the impact of high winds and storms on solar farms, referencing nearby damage at Camblesforth Solar Farm. Respondents have asked for clarification and certainty on how solar panels will be resilient to high winds, as well as further setbacks from properties, paths and roads to protect protect residents.	As set out in response to comment reference RNC-25 within The Applicant's Response to Relevant Reps - Part 1 [PDV-005], 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. 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

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					(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) [updated alongside this submission] .
REP1-044	D-WR-CLI-03	Louise Billingham		This scheme is presented as a green energy project. If approved, we ask that a condition is imposed requiring an independent whole-life sustainability assessment of achieving a CEEQUAL Excellent rating, so that it's environmental claims can be independently verified. As one of the largest solar parks in England, it should be the best, most environmental, most beneficial – a blueprint for what can be achieved, not a precedent for steamrolling local communities.	The Applicant has responded to matters regarding CEEQUAL Excellent rating within comment reference RNC-30 in The Applicant's Response to Relevant Reps - Part 1 [PDA-005] .
Landscape and Visual					
REP1-032; REP1-033	D-WR-LAN-01	Annette Exley Eliot Grant	Landscape and Visual	Landscape and visual effects around Site 2 are said to be underestimated given the concentration, scale and close proximity of solar arrays, the BESS and substation infrastructure, including substantial structures, fencing and acoustic barriers that would change the area from open countryside to a major electricity complex.	The Applicant has robustly and objectively assessed the likely landscape and visual effects of the Proposed Development against a methodology which has been informed by best practice guidance, extensive experience of assessing and designing similar, consented solar farm developments in similar contexts. This assessment has taken full account of the components proposed to be located within SDS2, including the scale and proximity of solar arrays, the BESS and substation infrastructure, including structures, fencing and acoustic barriers. The assessment has been made against the sensitivity of the landscape and people's views of the landscape following established principles set out in the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition. The likely landscape and visual effects of the Proposed Development which are reported in ES Volume 1 Chapter 10 - Landscape and Visual [APP-048] are based on a clear set of assumptions. The assessment neither exaggerates nor understates the likely effects and provides an objective basis for decision-making. SDS 2 lies within LCA 11: Sherburn Farmlands, as defined within the Selby Landscape Character Assessment, 2019. This published landscape character assessment does not define the value attached to the landscape and so the Applicant has carried out a detailed, objective and evidence based assessment against a set of factors informed by Landscape Institute Technical Guidance Note (TGN) 02/21 Assessing landscape value outside national designations. This has determined that, against the criteria set out in Table 1-2 of ES Volume 3, Appendix 10.1: Landscape

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					and Visual Assessment Methodology [APP-167], the value attached to the landscape of LCA 11 is low, assessed on a five point scale ranging from very low to very high. The assessment reflects the lack of landscape designations, the dominant intensive arable land use over many decades has resulted in the loss of natural heritage and function, distinctiveness and condition across most of the area and detracting features on the skyline. The susceptibility as a whole has been assessed as low and overall, reflecting the already highly modified working landscape, the sensitivity to the Proposed Development within LCA 11 is low. The results of this assessment are presented in Table 2-23 of ES Volume 3, Appendix 10.2: Landscape Baseline and Effects [APP-168]. At the site level, this is reflected in the assessment for SDS 2, which is also assessed as having low sensitivity. The results of this assessment are presented in Table 2-3 of ES Volume 3, Appendix 10.2: Landscape Baseline and Effects [APP-168]. SDS 2 comprises four large, flat arable fields with no hedgerows and is cut in two north to south by Fleet Dike. Historic map regression demonstrates that historically the landscape of SDS was substantially more diverse, with a patchwork of 18 fields and Fleet Dike meandering across in the 1830-1880s OS Six Inch map. The western side of SDS is bounded by tall, dense trees and a large block of deciduous woodland lies in the north-eastern corner. It lies to the north the A63, on a busy, straight, single carriageway section of road with a national speed limit. The western part of the southern boundary adjacent to the A63 is lined by a gappy hedgerow, but historic Google Streetview photography demonstrates that this hedgerow has been recently cut and that when grow out is capable of screening views into large parts of the substation and BESS compounds during the summer. The eastern part of the southern boundary is lined by more mature trees and hedgerow. The substation and BESS infrastructure proposed within SDS2 would be set back approximately 25m from the edge of the road. This would reduce the sense of scale apparent in views from the A63, but it would still appear as a mass across the middle ground. Overall, with reference to the assessment at VP11, VP12 and VP55, the magnitude of impact is assessed as high in construction, year 1 and year 15 of operation at these locations. The Outline Environmental Masterplan (OEM) [PDA-005] proposes a band of trees and shrubs parallel with the road with a depth of approximately 12m. The majority would be forestry transplants, which mean that in year 1 of operation, views would remain more open, screened or filtered place by the existing vegetation along the A63. The Applicant provided estimates of how tall planting could reach at year 5 and year 15 of operation in Written Summary of Applicant's Oral Submissions at ISH1 [REP1-004]. By year 15 of operation, planting would have grown by around 4.5m. As this planting is proposed closer to the road that the infrastructure, this would effectively screen the substation and BESS from the road. This is demonstrated by the photomontage for

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					VP55, located to the north of the A63 and presented in Sheet 66 of ES Volume 3, Appendix 10.4: Photography and Photomontages [AS-028]. With reference to ES Volume 3, Appendix 10.3: Visual Baseline and Effects [APP-169], the LVIA has concluded that there would be moderate adverse significant effects on people travelling along the A63 through viewpoints VP11, VP12 and VP55 during construction and year 1 of operation. Effects would gradually reduce as the proposed planting establishes and by year 15 of operation, the proposed structures would be largely screened from the A63 and effects would be minor adverse, which is not significant. In summary, the sensitivity of the landscape into which the SDS2, including the proposed substation and BESS would, be located has been assessed as being low. This is because it lacks important, distinctive features or characteristics and presents substantial opportunities for integration and visual screening based on its flat topography and surrounding context. The LVIA recognises that the magnitude of impact would remain high and the resulting effects would be moderate adverse (significant) at year 15 of operation. However, in the context of the wider LCA 11: Sherburn Farmland, effects would not be significant in operation with the establishment of mitigation.
REP1-054	D-WR-LAN-02	Wendy Tomlinson	Landscape and Visual Traffic and movement	Proximity of the Works to Field House Farm The Applicant states that Field House Farm is approximately 1.5 km from the nearest solar infrastructure, approximately 825 metres from the nearest Solar Development Site and approximately 500 metres from the Cable Route Corridor. These distances do not accurately reflect the principal concern. The proposed construction access CA2 would use the access lane serving Field House Farm and would pass immediately beside the family home, tourism businesses, caravan and motorhome storage business and existing security arrangements. The likely effects therefore arise not simply from the distance to the solar panels or cable trench, but from the direct use of the existing access serving the property and businesses. The Applicant’s reliance upon wider separation distances risks understating the actual proximity and nature of the proposed impact.	The LVIA presented in ES Volume 1 Chapter 10 - Landscape and Visual [APP-048] does not specifically identify residents of Field House Farm as visual receptors of the Proposed Development or assess impacts on their private views, but notes the concerns regarding the proximity of the proposed construction access CA2. Occasional construction vehicles accessing CRC 1-4 to the west would be visible from the north facing elevation of the property during the construction period. The Applicant has also updated the oCTMP [updated alongside this submission] at Deadline 2 to engage with Field House Farm in respect of managing construction traffic movements, including exploring improvements to the access track if this is ultimately required.
REP1-042	D-WR-LAN-03	Kim Jones	Landscape and Visual	Impact on Wistow What assessment has been made of the impact on residents of Wistow?	The closest part of CRC 1-4 is located approximately 600m to the south of the southern edge of Wistow. The closest viewpoint to the settlement is VP60 which is located on a public footpath (35.74/2/1) approximately 280m to the west of the village. ES Volume 3 - Appendix 10.3 Visual Baseline and Effects [APP-169] defines the value attached to views

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					across the flat arable landscape as low and the susceptibility to change as medium. Overall, the sensitivity of people travelling along this PRoW is assessed as medium. The assessment notes that there would be a Cable Construction Compound and associated vehicle movement will be visible in the middle ground to background where the cable route crosses open farmland and the magnitude of impact would be medium. The assessment considers that only short sections of the path would be affected and the significance of effect would be minor adverse, which is not significant. There are unlikely to be views of construction activity within the village and properties on the southern edge are likely to experience views similar to VP60 in the worst-case, but the density of buildings and vegetation means that views are likely to be heavily filtered or substantially screened. In operation, the closest above ground infrastructure would be located within SDS8, approximately 5.5km to the south-west. ES Volume 2 - Figure 10.4.2 Zone of Theoretical Visibility (ZTV) – Screened [APP-094] demonstrates that there would be no views of the Proposed Development from within the village or its landscape setting.
REP1-055	D-WR-LAN-04	Martin Nichols	Landscape and Visual	I would also add that views into Solar Development Site from Skipwith Road to the west of Solar Development Site 1 are no longer largely curtailed by roadside hedgerows, apart from occasional gaps into the fields as stated in APP-048 06.01.10 Environmental Statement Volume 1 Chapter 10 - Landscape and Visual 10.7.96, due to the removal / cutting back of existing hedges and vegetation leaving large open gaps as shown in the photos attached. In view of the above, I consider that the need for the provision of screening in the form of advanced planting at Solar Development Site 1 receptors N11-N21, 24 that would be predicted to significantly screen reflecting areas should be re-assessed.	The hedgerow that lines the eastern side of Skipwith Road has recently been coppiced and interplanted by the landowner. Coppicing is a method of restoration used when hedgerows have matured past their peak condition which sees the hedge cut down with the top growth removed. The hedgerows were not removed and they will grow back quickly and with many more stems to revitalise the hedges, further supplemented by the new plants where there were gaps. By the time that construction of the Proposed Development commences, this management and planting will have established to reinforce and strengthen the boundary vegetation and screening of the Proposed Development experienced by people travelling along the Road. This will be further reinforced through planting undertaken by the Applicant, as illustrated on the Outline Environmental Masterplan - Site1 – Sheet 1 [updated alongside this submission] and Site 1 - Sheet 2 [updated alongside this submission].
Biodiversity and Ecology					
REP1-032	D-WR-BIO-01	Annette Exley	Biodiversity and Ecology	The masterplans identify Gilbertsons Wood Ancient Woodland adjoining Solar Development Site 1 and Gateforth Wood Ancient Woodland adjoining Solar Development Site 4. Ancient woodland is an irreplaceable habitat. NPS EN-1 provides that the Critical National Priority presumption does not apply to residual impacts presenting an unacceptable risk to, or unacceptable interference with, irreplaceable habitats.	The design of the Proposed Development incorporates a minimum 15 m offset from the designated ancient woodland Gilbertson's Wood, in line with Natural England and Forestry Commission standing advice on the protection of ancient woodland during development (Natural England/Forestry Commission (2022), as set out in the ES Volume 3, Appendix 16.2: Arboricultural Impact Assessment [APP-184] (updated alongside this submission). Ancient woodland, ancient trees and veteran trees: advice for making planning decisions). A 15 m buffer will be sufficient to protect the root protection areas of edge trees within Gilbertsons Wood, which are early-mature and have a calculated RPA of 6 m. The security fencing for the solar area nearest the ancient woodland

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				The Applicant relies on a minimum 10 metre buffer from woodland and 15 metres from ancient woodland. The Examining Authority should satisfy itself that those buffers are secured by Requirement, that they are adequate having regard to Natural England's standing advice on root protection and hydrological effects, and that no part of the Order Limits, including access, cabling or construction working areas, encroaches upon them.	has been designed a minimum of 20 m from the woodland edge and the nearest panels will be positioned beyond this. Therefore, no construction activity associated with the Solar Development Sites will take place within 20 m of ancient woodland. Hydrological impacts will be limited as the vast majority of watercourses within and around the Order Limits will remain unaffected by the works, save for discrete areas of proposed in channel works i.e. for access. However, flow conditions will be maintained through any in channel works, and the vast majority of watercourses will be retained, with a 10 m buffer zones incorporated around them. Furthermore, the solar panels will be located sufficiently far from the woodland not to interrupt lateral of vertical water movement into the woodland. Woodlands and tree lines contiguous with Gilbertson's Wood that afford habitat connections will be retained and protected as part of the development. The Proposed Development will therefore not result in the deterioration of ancient woodland. The security fencing for the solar area nearest the woodland has been designed a minimum of 15 m from the woodland edge and the nearest panels will be positioned further than 20 m from the woodland edge. These distances will be sufficient to protect the root protection areas of edge trees within the woodland, which are early mature and have a calculated RPA of 5.5 m. The design incorporates a minimum 10 m offset from Gateforth Wood (a non-ancient woodland) and its boundaries, ensuring that development is not located directly adjacent without mitigation, alongside the retention of intervening field boundaries such as hedges where practicable. Furthermore, Gateforth Wood is further separated from Solar Development Site 4 by Maspin Moor Drain. These above matters are secured by DCO Requirement pursuant to the Design Parameters and Commitments Document [updated alongside this submission].
REP1-032	D-WR-BIO-02	Annette Exley	Ornithology	Functionally linked land supporting a European site is a matter for the Conservation of Habitats and Species Regulations 2017, not for the planning balance. NPS EN-1 makes the Critical National Priority presumption subject to legal requirements, and the Habitats Regulations are such a requirement. I invite the Examining Authority to require the Applicant to state which European sites were screened in respect of functionally linked land; what survey effort was undertaken across which seasons and years; whether Natural England has confirmed it is content with the functionally linked land assessment; and whether North Yorkshire	The Lower Derwent Valley SPA/Ramsar site and the Humber Estuary SPA/Ramsar site were screened for potential impacts on Functionally Linked Land (FLL). Survey effort was designed and undertaken in accordance with Natural England's Annex C guidance for assessing impacts on Functionally Linked Land associated with European sites, including the Humber Estuary and Lower Derwent Valley SPAs and Ramsar sites. Surveys were completed throughout the non-breeding bird period, which Annex C defines as comprising both the passage periods (March to mid-May and mid-August to October) and the wintering period (October to March). Survey effort was agreed with Natural England. The Applicant notes that Natural England is satisfied with both the survey effort undertaken and the conclusion that the Proposed Development

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				Council's request that the assessment be refined has been met. I reserve my position on this ground pending sight of the shadow Habitats Regulations Assessment and the ornithology chapter.	would not result in adverse effects on the integrity of the Humber Estuary or Lower Derwent Valley SPA and Ramsar sites through impacts on Functionally Linked Land. The Applicant is unclear as to the specific meaning of the statement that "North Yorkshire Council's request that the assessment be refined has been met". Notwithstanding this, the Applicant notes that North Yorkshire Council has deferred to Natural England's advice in relation to non-breeding birds and has indicated that it is satisfied in principle with the conclusions of the Shadow Habitats Regulations Assessment (sHRA) [updated alongside this submission]. The Applicant therefore considers that the assessment methodology, survey effort and conclusions relating to Functionally Linked Land are robust and have been accepted by the statutory nature conservation body with responsibility for advising on these matters. Note that all of the above information including correspondence can be found within the sHRA [updated alongside this submission].
Ornithology					
REP1-054	D-WR-ORN-01	Wendy Tomlinson	Ornithology	A successful Barn Owl breeding site is reported approximately 10 m from the proposed Field House Farm construction-access track. Respondents seek a site-specific assessment of disturbance from vehicle movements, banksmen, noise, vibration, lighting and human activity, together with enforceable safeguards before the access is used.	Pre-construction surveys will be undertaken prior to the commencement of construction activities and will inform the status of the breeding site referenced by the respondent. The Applicant notes that, whilst most barn owl exhibit site fidelity, the presence of a nesting site in one breeding season does not necessarily indicate that it will be occupied in subsequent years. Nevertheless, should an active nest be confirmed by a suitably licensed ecologist, an appropriate disturbance buffer will be established in accordance with relevant industry guidance and best practice (Shawyer, 2012). The extent of any disturbance buffer will be determined on a site-specific basis, taking account the location and characteristics of the nest site (i.e. sight lines), and the nature of the proposed construction activities (heavy landscaping etc.). The Applicant notes that traffic movements do not automatically represent a disturbance risk in all circumstances (i.e. birds nest within active, working barns/yards), and any potential effects will be considered as part of the determination of an appropriate buffer distance. Furthermore, where considered necessary and subject to the relevant ecological licences and approvals, measures may be implemented to discourage nesting within areas required for construction outside of the breeding period. This may include the temporary exclusion of nesting opportunities ("soft blocking"), alongside the provision of alternative nesting features, such as nest boxes, where appropriate. These measures would be designed and overseen by a suitably qualified ecologist to ensure compliance with relevant legislation and ecological best practice. The Applicant would like to reassure the respondent that suitable safeguards will be implemented to protect barn owl throughout the construction phase. The Applicant notes that construction activities will be temporary in nature and that pre-construction surveys, together with

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					appropriate mitigation measures, will ensure that any active nesting or roosting sites are appropriately protected in accordance with relevant legislation and best practice guidance. In addition, the Outline Landscape and Ecological Management Plan (oLEMP) [updated alongside this submission] commits to the provision of A-frame nest (suitable for barn owl) boxes per Solar Development Site. These measures are intended to enhance the availability of nesting opportunities across the Order Limits and increase the overall carrying capacity of the area for barn owl. The Applicant therefore considers that the combination of protective measures during construction and habitat enhancement measures delivered through the oLEMP [updated alongside this submission] will provide a net benefit for the species in the long term.
REP1-054	D-WR-ORN-02	Wendy Tomlinson	Biodiversity and Ecology	The mature native boundary trees, including willow, field maple and hazel, provide habitat connectivity, shelter and foraging opportunities for wildlife, whilst also offering practical shelter for grazing livestock within this actively managed field. The loss or disturbance of this habitat would result in an immediate reduction in available shelter and foraging opportunities that could not quickly be replaced through new planting. The existing fence line forms the long-standing boundary of the field and has been in place for many years. The field is actively used for grazing livestock and secure fencing must remain in place at all times to ensure animal welfare and prevent escape. Any temporary removal of fencing during construction would create an immediate and unacceptable risk to livestock management and normal farm operations. In addition, this boundary area has previously been subject to unauthorised access and thefts from the vicinity of the woodland edge. Maintaining a secure and continuous boundary is therefore important for site security and for the protection of the residential property and associated business operations. There is also concern that if boundary fencing is removed or altered, it may not be reinstated precisely in its original position. Even minor deviations could result in a permanent loss of land or create future uncertainty regarding the established field boundary. Appropriate safeguards would therefore be required to ensure that boundaries are accurately surveyed, protected and	Within the cable route, there will be no whole removal of linear boundary vegetation, and instead only very small sections (if any) of field boundary features will require removal, which will be reinstated following the laying of the cable within that area. This will maintain the use of the boundary feature for commuting wildlife post development. Boundary features will also be protected during the construction phase of development via sensitive working methodologies outlined in the Outline Construction Environmental Management Plan (oCEMP) [updated alongside this submission]. The Applicant is aiming to not affect the existing livestock fencing for Field House Farm, where reasonably practicable. In circumstances where this is not possible, the Applicant would engage with Mrs Tomlinson on appropriate steps to be taken, as part of its general commitment to engage with her. The Applicant is committed to providing security features on the site including cameras, perimeter fencing and lighting. These are set out in more detail in ES Volume 1, Chapter 2: The Proposed Development [updated alongside this submission]. These measures are secured via the oOEMP [updated alongside this submission].

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				reinstated throughout any works, with no period during which the site is left unsecured.	
REP1-054	D-WR-ORN-03	Wendy Tomlinson	Biodiversity and Ecology	The Land Plans also appear to show a comparatively wide corridor being proposed through this area and into part of an actively managed grazing field. This raises further questions as to why such an extensive area is required in this location, particularly where existing woodland edge vegetation and habitat are already present immediately adjacent to the access track. It is unclear whether alternative approaches or a reduced corridor width could lessen impacts on the established field boundary, productive agricultural land, existing habitat and normal farm operations. This corner of the field was also being considered for future native tree and habitat planting to further strengthen the existing woodland edge and ecological connectivity. Field House Farm has been progressively restored and managed over decades to create a quiet rural environment supporting tourism accommodation, wildlife habitat and agricultural use.	The Cable Route Corridor access adjacent to Field House Farm has been developed through the design process taking account of highway suitability, safety, access to the site and the need to connect to the existing road network in an efficient and appropriate manner. Alternative access arrangements were considered; however, the identified access is considered to represent an appropriate solution having regard to the characteristics of the local highway network and the overall construction strategy (refer to Appendix A of Written Summary of Applicant's Oral Submissions at CAH1 [REP1-005]). The access at Field House Farm would be used solely to facilitate construction of the Cable Route Corridor and only for the period required to install this section of the cable. The land use for the Cable Route Corridor would therefore be temporary in nature and, once the cable has been installed, the land would be reinstated to its previous state and use. Optionality over access to this section of the cable route corridor for construction traffic will reduce potential impacts on ecology via the use of existing tracks and ditch crossing points. The Applicant has set out assumptions for the tree retention, removal and pruning in ES Volume 3, Appendix 16.2: Arboricultural Impact Assessment [APP-184] around Field House Farm. The assessed worst-case assumes that removals along the boundaries of this property will be limited to short lengths of hedge and 4 individual trees along Skipwith Road, and 1 individual tree, 1 tree group and 2-3 trees from a woodland block, all on adjacent land to the east of the access driveway to facilitate construction access.
Water Resources and Flood Risk					

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REP1-032	D-WR-WAT-01	Annette Exley	Water Resources and Flood Risk	The flood-risk Sequential Test is challenged because the alternative-site search is said to have been constrained by the Applicant’s grid connection. Respondents argue that the test should be rerun and evidenced using a search area that is not artificially limited by that commercial/grid constraint.	With regard to the search area being limited by the grid connection, it is acknowledged in NPS EN-3 paragraph 2.10.17 that “<i>to maximise existing grid infrastructure... applicants may choose a site based on nearby available grid export capacity</i>”. The Applicant has been offered a grid connection at Monk Fryston and has entered into a connection agreement with National Grid. This has formed the basis of the Applicant’s area of search for site selection. Section 3.8 of the Statement of Need [APP-214] explains that the government has established challenging capacity ranges for low-carbon generation technologies to deliver and sustain a clean power system while electricity demand grows on the pathway to net zero by 2050. Section 3.7 of the Statement of Need explains that grid connection is a major bottleneck to delivering those capacity ranges (and beyond). Therefore, the Applicant is proposing a scheme which maximises use of the available grid connection secured at National Grid’s Monk Fryston substation. It is considered that utilising an available grid connection, and basing the search area around this, is aligned with the NPS and the government’s plans for delivering Clean Power at an unprecedented pace and scale. Once a search area was established, 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 [updated alongside this submission] 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 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

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					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.
REP1-054	D-WR-WAT-02	Wendy Tomlinson	Water Resources and Flood Risk	4.3 Junction, signs and flooding During periods of rainfall, water regularly collects at the end of the Field House Farm lane (Figure 4) and is known locally to cause access and highway-safety problems. “Road liable to flooding” warning signs are also present on Skipwith Road between Field House Farm and Skipwith, less than a mile away. This localised flooding does not appear to be shown on the Applicant’s “Risk of Flooding from Surface Water” mapping for this location. The mapping therefore does not appear to reflect the conditions experienced in practice. These existing conditions need to be considered alongside construction turning movements, particularly where larger or slower vehicles may need additional space or time to enter and leave the lane. The photographs in Figure 4 were taken before the end of the Field House Farm lane was resurfaced with tarmac. They are included to show that water was already collecting at the junction before those works were carried out and that the problem was not caused by the resurfacing of the lane entrance. The junction also depends on adequate visibility. I have cut the highway verge near the junction for many years to preserve sightlines and improve safety for residents, guests and customers entering and leaving the lane. This work has been undertaken voluntarily because the businesses depend upon safe public access. I need to understand whether the Applicant intends to rely upon those sightlines, whether additional cutting or alteration would be required, who would maintain the verge and visibility during construction, and what would happen if I were no longer able or willing to undertake that work for the benefit of the proposed development.	The Applicant welcomes the additional information provided regarding observed localised ponding and flooding at the junction of Field House Farm Lane and Skipwith Road. As acknowledged within the Flood Risk Assessment (FRA) [updated alongside this submission], national-scale surface water flood mapping has inherent limitations and may not capture all localised drainage issues or short-duration ponding associated with highway drainage, topographic depressions or other site-specific conditions. The FRA [updated alongside this submission] provides further clarification regarding the assessment of surface water flood risk and the interpretation of national and site-specific flood risk datasets. The FRA [updated alongside this submission] does not rely solely on national mapping datasets and incorporates site-specific assessments and hydraulic modelling to provide a more detailed understanding of flood risk across the Proposed Development. Surface water flood risk will be managed through detailed design and the implementation of the measures outlined within the Outline Drainage Strategy [updated alongside this submission] and oCEMP [updated alongside this submission]. As set out in the oCEMP [updated alongside this submission] a detailed Surface Water Management Plan will be prepared to accompany the detailed CEMP(s) prior to the commencement of construction and will provide details on suitable management and monitoring measures for surface water during construction. Notwithstanding this, the use of this access point will not be constrained by surface water flooding. The Order Limits include the area required to provide the recommended visibility splay based upon the desirable minimum standards set out in the Design Manual for Roads and Bridges (DMRB). Including the visibility splay requirements within the Order Limits ensures that the Applicant has the ability to manage and maintain vegetation, and remove any

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					obstructions within the visibility splays (subject to re-assessment at detailed design), during the construction period.
REP1-054	D-WR-WAT-03	Wendy Tomlinson	Water Resources and Flood Risk	The drainage serving Field House Farm, including its connection with unregistered land and recent estate drainage works, should be accurately identified, recorded and protected before cable or access works, with arrangements for repair, maintenance and continued operation.	The Applicant welcomes the information regarding Field House Farm drainage. The Outline Construction Environmental Management Plan (oCEMP) [updated alongside this submission] 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.
REP1-051	D-WR-WAT-04	Stephanie Victoria Crabtree	Water Resources and Flood Risk	Solar panels (depending on the tilt angle) can accumulate debris such as bird droppings, dust/mud from heavy nearby farming (which is the case in the proposed area where the soil is extremely fine and prone to being whipped up into the air by farm vehicles), and lichen which grows naturally in warm/wet environments. This debris can reduce the effective operation of the panels and necessitate cleaning which may involve the need for large volumes of water from the local area, and maintenance vehicles, again, using the original Field House Farm access lane from Skipwith Road. Has all this been considered?	The Water Resource Assessment [updated alongside this submission] water demand figures presented are indicative literature-based assumptions, subject to refinement when the cleaning method, frequency and contractor requirements are known. The water demand figures will be refined as the design progresses and more detailed information becomes available. The vehicular movements associated with the water demands set out in the Water Resource Assessment have been taken into account in the assessment presented in ES Volume 1, Chapter 14 - Traffic and Movement [updated alongside this submission]. The Field House Farm access lane provides access to the Cable Route Corridor, and does not provide access to any Solar Development Sites where the panels would be located. Therefore, the Field House Farm access will not be used to access any panel areas.
Traffic and Movement					
REP1-047; REP1-051; REP1-053; REP1-054	D-WR-TRA-01	Nichola Tomlinson Stephanie Victoria Crabtree Wendy Tomlinson	Traffic and Movement	The proposed use of Field House Farm's sole single-track access is said to conflict with its established use by residents, holiday guests, caravan and motorhome customers, deliveries, farm vehicles, pedestrians and cyclists. Respondents question whether the existing baseline and junction/yard safety have been properly assessed and how safe access would be maintained during construction.	The Applicant notes this comment. Access to the Cable Route Corridor utilises the private access lane serving Field House Farm. This would be temporary use for installation of this section of the Cable Route Corridor only. The Applicant has also updated the oCTMP [updated alongside this submission] at Deadline 2 to engage with Field House Farm in respect of managing construction traffic movements, including exploring improvements to the access track if this is ultimately required. These measures will ensure that access to Field House Farm is maintained throughout the construction period.

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REP1-054	D-WR-TRA-02	Wendy Tomlinson	Traffic and Movement	The practical scope, duration and intensity of proposed use of the Field House Farm access remain unclear, including whether it would be used for construction, maintenance or decommissioning; whether abnormal loads or specialist vehicles could use it; vehicle numbers, dimensions and hours; works to the lane and adjoining land; and whether use would be continuous, intermittent or required again later.	The Applicant notes this comment. Access to the Cable Route Corridor utilises the access lane serving Field House Farm. This would be temporary use for installation of this section of the Cable Route Corridor only. ES Volume 3, Appendix 14.1: Transport Assessment [updated alongside this submission] forecasts that the Cable Route Corridor could generate 7 HGV movements, and 5 LGV/car movements on a daily basis, whilst it is in use. There is also a requirement to use the access for the delivery of the cable which is expected to be delivered by an Abnormal Indivisible Load (AIL). The Applicant has updated the oCTMP [updated alongside this submission] at Deadline 2 to engage with Field House Farm in respect of managing construction traffic movements, including exploring improvements to the access track if this is ultimately required. These measures will ensure that access to Field House Farm is maintained throughout the construction period. An outline Construction Traffic Management Plan (oCTMP) [updated alongside this submission] has been developed to include measures to manage construction traffic, reduce disturbance and maintain communication with affected businesses and local communities during construction. This includes a commitment to the use of banksmen, when required, which may be applicable during busier periods to manage movements at the junction and along the lane.
REP1-032	D-WR-TRA-03	Annette Exley	Traffic and Movement	Road-safety assessment is said not to cover all construction accesses, particularly private/off-highway accesses to the cable route corridor. Respondents seek assessment of every access and identification of route sections that cannot safely accommodate two-way HGV movement, together with the physical works and controls required.	The Applicant notes these comments. ES Volume 3, Appendix 14.1: Transport Assessment [updated alongside this submission] includes a road safety review using data that is publicly available. The review covers the highway network extent serving the Proposed Development. The road safety review utilises data relating to collisions on public roads that are reported to the police, and subsequently recorded, using the STATS19 collision reporting system. Given the rural nature of the area, it is acknowledged that many of the construction routes are narrow in sections. Subsequently, the assessment has identified a number of stretches of public highway where passing places will be needed and these locations, referred to as Highway Improvement Areas, are shown on Figure 1.2 [APP-058]. Similarly, at locations such as Field House Farm, following engagement with affected parties, it may be the case localised improvements to private access tracks (such as passing places) are undertaken to accommodate Cable Route Corridor construction traffic – the need for this would be discussed with those parties. The oCTMP [updated alongside this submission] includes for the provision of passing places, and the area required for these passing places has been allowed for within the Order Limits, with final positions within those locations of highway to be identified by the contractor and

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					agreed with the Local Highway Authority when the detailed Construction Traffic Management Plan is approved.
REP1-032	D-WR-TRA-04	Annette Exley	Traffic and Movement	There is also a straightforward non-compliance. NPS EN-1 provides that the applicant should prepare a travel plan adopting a vision-led approach to identify demand management, monitoring and fall-back measures. The Applicant's Policy Compliance Document states plainly that a Travel Plan has not been developed for the Proposed Development, and relies instead on the Outline Construction Traffic Management Plan. The reason given is that the rural character of the area and early shift patterns mean most construction workers will use a vehicle. That is a description of the problem the policy exists to address, not a reason for not addressing it.	The Applicant notes this comment. Section 3.5 of the oCTMP [updated alongside this submission] sets out a range of sustainable travel measures for construction employees. In developing these measures, the Applicant has taken a realistic approach that recognises the rural location of the Proposed Development and the limited opportunities for travel by public transport. Consequently, the oCTMP includes a commitment to provide shared transport arrangements to reduce the number of employee car trips, alongside the provision of cycle parking facilities. The oCTMP [updated alongside this submission] also outlines monitoring procedures. Prior to construction, the appointed contractor will be required to update the CTMP with site-specific details, including employee travel arrangements, which will be approved by the relevant planning authority in consultation with the relevant Highway Authority. At this stage, a standalone Travel Plan would not provide any additional meaningful information beyond that already included within the oCTMP. The Applicant therefore considers that the inclusion of sustainable travel measures within the oCTMP represents a proportionate and appropriate approach.
REP1-033	D-WR-TRA-05	Eliot Grant	Traffic and Movement	The proposed Site 2 access arrangements around Fryston Common Lane are challenged because construction traffic appears likely to use the lane despite previous assurances, and the identified farm track is considered unsuitable for regular HGV use and constrained by a dyke, gate and existing access arrangements.	The Applicant notes this comment. Fryston Common Lane has been removed from the construction routing for the Proposed Development, however, has been retained as an alternative emergency access route. Access across Fryston Common Lane is also required to move between the fields in Solar Development Site 2 but movements along Fryston Common Lane should only occur if emergency access is required.
REP1-033	D-WR-TRA-06	Eliot Grant	Traffic and Movement	Site 2 access via A63 and other access rights The Applicant has identified a main access point to Site 2 at 13g/Sheet 13 on the Streets Plan. The Streets Plan also suggests using the farm track from 13g to 13h/ Sheet 13 as a main construction and vehicle access road. This farm track is not suitable for HGVs to use on a daily and continuous basis, nor was it ever intended to be. It is only suitable for and used by farm vehicles and 4x4s for periodical access. The track crosses a dyke which cuts the full length of 13-021 part way along. At this point there is currently a padlocked gate which	The Applicant notes this comment and confirms that the Street Plans [APP-011] illustrate the existing street network. The proposed internal access route is shown on the Outline Environmental Masterplan [updated alongside this submission], which indicates that the access track from the A63 junction travels north-west to connect with Fryston Common Lane. The access from the A63 will be upgraded to accommodate the Proposed Development, with details of the highway works at the access to be secured through the detailed CTMP, to be agreed with the relevant Highway Authorities prior to the commencement of construction. The Outline Environmental Masterplan [updated alongside this submission], for SDS 2 shows that a minimum 30m offset from solar panels will be provided from the curtilage of the residential property, measured from the outbuildings that lie to the west of the house. The

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				prevents public access and in so doing ensures no through road from Fryston Common Lane. [REDACTED] has right of access by foot and by vehicle to this track and access to the A63 (see attached [REDCATED] Deeds and attached email sent 20/11/2025). No consideration nor consultation has been given by the Applicant to these access rights. All rights should be upheld given the disruption proposed to other access routes. This farm track (proposed access road) currently runs adjacent to our boundary. The Applicant proposes to use this track and access Fryston Common Lane at 13h/Sheet 13 of the Streets Plan which is directly next to the boundary fence of [REDACTED]. This is land that should be designated as a buffer with significant landscaping, noise reduction and security zoning. This access point is wholly unacceptable and falls far too close to our home and boundaries. We ask the Examining Authority to review these access points and traffic routes to ensure significant buffers are upheld and to explore why the Applicant has failed to address these points with us.	access track is located within this offset. Native species hedgerows are proposed along the track, which will within a corridor of approximately 15m.
Socio-Economics, Recreation and Tourism					
REP1-047; REP1-054	D-WR-SOC-01	Nichola Tomlinson Wendy Tomlinson	Socio-Economics, Recreation and Tourism	The caravan and motorhome storage business at Field House Farm relies on controlled access, discretion and the ability to identify unusual activity. Increased construction traffic, unfamiliar personnel and changes to vegetation/access could make authorised activity harder to distinguish, increase security concerns and undermine customer confidence.	The Applicant acknowledges these concerns. Field House Farm has been assessed within ES Volume 1, Chapter 13: Socioeconomics [updated alongside this submission] and ES Volume 3, Appendix 13.1: Socioeconomic Receptors Impact Assessment [APP-177]. The assessment identifies the receptor as having a medium sensitivity to change but concludes that the effects arising from the Proposed Development would be minor adverse and not significant. The Applicant notes that the concerns raised relate primarily to perceptions of security arising from increased activity during the construction phase. Construction activities would be temporary in nature and would be managed through approved construction management plans. Access to existing businesses would be maintained throughout the construction period and the Proposed Development would not require public access through the caravan and motorhome storage facility. The assessment does not identify any significant effects on the operation or viability of the

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					business as a result of construction traffic or workforce activity. The Applicant has also updated the outline CEMP at Deadline 2 to make a specific commitment to engage with Mrs Tomlinson in respect of managing impacts to Field House Farm, noting that they are limited to access taken by HGVs on an adjacent track during the construction phase only) (as Field House Farm is otherwise located approximately 500 meters away from the Cable Route Corridor – therefore, in terms of where the Order Limits are closest to the property, this is purely for access to the Cable Route Corridor, and that there would be minimal impacts from cable construction itself to the property, given the distance and intervening vegetation).
Agricultural Land and Soils					
REP1-032	D-WR-AGR-01	Annette Exley	Agricultural Land and Soils	The site-selection approach is challenged against policy favouring poorer-quality land over Best and Most Versatile agricultural land. Respondents argue that commercial/grid proximity does not by itself justify the concentration of BMV land, and cite the removal of BMV land from Site 1 as evidence that further avoidance and redesign are possible.	The Applicant has responded to matters regarding the use of Best and Most Versatile (BMV) land within comment reference GCTM-03 in The Applicant’s Response to Relevant Reps - Part 1 [PDV-005]. ES Volume 3 Appendix 3.1 - Site Selection Assessment Report [AS-019] sets out the five stages of the site selection methodology, which sought where practicable, to locate infrastructure on lower quality land. Stage 1 initially excluded land provisionally mapped as Grade 1, 2 and 3, and Stage 2 considered brownfield land. Agricultural land in BMV quality was only considered at Stage 5, and was balanced against a number of other factors as described in that report. ES Volume 1, Chapter 5 [updated alongside this submission] paragraph 5.9.18 explains that 80% of the agricultural land in Selby District is estimated to be BMV quality. Any large-scale development is very likely to require the use of BMV quality land.
Major Accidents and Disasters					

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REP1-032	D-WR-MAD-01	Annette Exley	Major Accidents and Disasters	Fire risk at the substations is assessed nowhere The oBSMP states that because technologies such as transformers, conversion units and switchgear have been deployed over a long period and their risks are better understood and regulated through longstanding industry guidance and codes, only the battery component of the BESS is addressed in that report. Separately, the Applicant's Policy Compliance Document records, under the heading of hazardous substances, that no significant effects associated with battery fires or other electrical fires are considered likely and that further assessment of the risk and effects of fires is scoped out of the Environmental Statement. The combined effect is that fire risk at the proposed substations is assessed in neither document. I note that the number and location of those substations is itself inconsistently reported. The Grid Connection Statement refers to 275kV substations on Site 2 and Site 4 only. The Design Parameters and Commitments Document lists Work No. 3, being an up to 275kV substation with associated transformer bays, feeder bays, transformers, switchgear buildings and ancillary equipment, as located in Solar Development Sites 1, 2 and 4. The Applicant's own Outline Environmental Masterplan for Sites 2, 6, 7 and 8 states that proposals for a substation have been removed from Site 6, leaving Sites 1, 2 and 4 with proposed substations, and the masterplan for Site 1 shows a substation and records that it has been sited away from properties and Skipwith Road. There are therefore three substations, and the document whose statutory purpose is to describe the grid connection addresses only two of them. It is excluded from the Environmental Statement by scoping and excluded from the Battery Safety Management Plan by definition. That is not a technicality. A 275kV substation compound of up to 3.5 hectares contains super grid transformers holding very substantial volumes of mineral insulating oil. Transformer fires are long-duration events producing dense smoke and large volumes of contaminated firefighting water. The	The risk of fire in substations has been proven historically to be low. The Applicant submitted an EIA Scoping Report (ES Volume 3) [APP-143] which summarised the position with respect to fire risk and concluded that further assessment of the risk and effects of fires was scoped out. The EIA Scoping Opinion issued by the Planning Inspectorate (ES Volume 3) [APP-144] agreed with this assessment. The Design Approach Document [APP-216] sets out the design approach with respect to minimising impacts on receptors. The substations would be designed and operated in accordance with all relevant guidelines and standards, including the Oil Storage Regulations 2001. An outline Pollution and Spillage Response Plan (oPSRP) [updated alongside this submission] applies to pollution risks from the substation. The outline Construction Environmental Management Plan (oCEMP) [updated alongside this submission] sets out that measures for pollution control will be implemented at the substations. The Outline Drainage Strategy [updated alongside this submission] sets out measures for the management and containment of fuels, oils and chemicals, and, where relevant, firewater runoff.

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				Site 4 substation is proposed on the parcel at the northern edge of the River Aire. The Site 2 substation is proposed, on the host authority's own account, within approximately 10 metres of the A63. I invite the Examining Authority to require the Applicant to state what oil inventory is proposed at each substation, what bunding and containment capacity is provided, and in which submitted document the fire and pollution risk arising from that inventory has been assessed. If the answer is that it has not been assessed, that gap should be closed within this Examination and not after consent.	
Utilities and Telecommunications					
REP1-053; REP1-054	D-WR-ULT-01	Wendy Tomlinson	Utilities and Telecommunications	The Applicant's records are said not to identify all electricity, water, fibre/telecommunications and drainage infrastructure within the Field House Farm lane. Respondents seek physical verification and accurate mapping of utilities before rights or works proceed, together with protection, repair and service-continuity arrangements.	The Applicant has conducted utilities searches in the usual way by engaging with utility companies. However, the Applicant welcomes conversations with Ms Tomlinson to ensure all utilities are identified, and that their apparatus are covered by the Protective Provisions within the DCO.
Glint and Glare					
REP1-055	D-WR-GLI-01	Martin Nichols	Glint and Glare	APP-186 06.03.16.04 Environmental Statement Volume 3 - Appendix 16.4 Glint and Glare Assessment - Table 23, Plate 13 Impact classification - Road receptors north area Concern raised that Receptors N11-N21, N24 have been incorrectly assessed as 'Solar reflections geometrically possible from outside of road user's primary field of view' and should be re-assessed as 'Solar reflections geometrically possible from inside a road user's primary field of view' similar to Receptor N25.	The analysis in the Glint and Glare Assessment [APP-186] considers whether receptors travelling in either direction along the road would have views of reflecting panels within the primary field-of-view (FOV) (50 degrees either side of the direction of travel). Not all of the panels have the potential to reflect towards all receptors, and as such whilst some panels be within a driver's primary FOV, this does not necessarily indicate that reflections are possible within the primary FOV. This is the case for receptors N11-N21 and N24, whereas N25 has reflections within its primary field of view due to the road curving enough such that drivers travelling southbound are predicted to have reflections within their primary FOV.

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				The reason for my concern is that these panels will be south facing and present a risk to road users from reflected glare during the autumn and winter months in the afternoon when the sun is at its lowest in the sky.	
Battery Safety					
REP1-032	D-WR-BAT-01	Annette Exley	Battery Safety	The plan permits its own control measures to be omitted Paragraph 1.1.6 of the oBSMP provides that nothing within it would prevent the modification or omission of the control measures set out in the Environmental Statement, and that this will be confirmed at the time of submission of the detailed Battery Safety Management Plan, including confirmation that the absence of or change to such control measures would not lead to any materially new or materially different effects than those reported in the Environmental Statement. A safety document which expressly contemplates the omission of its own control measures, on the basis of a confirmation given by the party proposing the omission, does not secure those measures. The Examining Authority should consider whether the Requirement in Schedule 2 of the draft Development Consent Order can properly be said to secure the oBSMP when the oBSMP itself provides for its contents to be departed from.	The wording in the OBSMP is aligned with standard practice in DCOs. The BESS cannot be constructed until NYC has approved the detailed BSMP and the information that is required to be submitted to NYC at the relevant time by that plan. So it will be for NYC to be content with any proposed changes, noting that they would still need to ensure that no materially new or different effects than those reported in the ES will arise.
Land Interest Specific Feedback					
REP1-032; REP1-054	D-WR-LI-01	Annette Exley Wendy Tomlinson	Land Interest Specific Feedback	The necessity and proportionality of compulsory acquisition or compulsory rights are disputed. Respondents argue that the Applicant must demonstrate a compelling case in the public interest, show that the land and rights are genuinely required, and evidence that reasonable less harmful alternatives have been properly	The Applicant has sought, wherever practicable, to minimise the land subject to compulsory acquisition powers and the effects on the local community through an iterative design process informed by consultation, surveys and assessments, as described in ES Appendix 3.1: Site Selection Assessment Report [AS-019]. In relation to Field House Farm, the Applicant can confirm that the rights sought across Plots 03-005, 03-005a, 03-006, 03-007, 03-008, 03-008a, 03-009, 03-010, 03-011 are temporary in their nature. The access from

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				explored before powers are granted, including at Field House Farm.	Skipwith Road, travelling past Field House Farm is to be used during the construction phase. Originally, the Applicant had considered that these rights would be required permanently, intended for operational purposes post construction, but can now confirm that only construction access is required. This is explained further in other Deadline 2 submissions and the Land Plans [updated alongside this submission] and Book of Reference [updated alongside this submission] have been updated to reflect this The Statement of Reasons [updated alongside this submission] explains why compulsory acquisition powers are necessary to deliver the Scheme. The powers sought are limited to those reasonably required, and each plot within the Order land is needed for an identified purpose. The Land and Rights Negotiations Tracker [updated alongside this submission] identifies the powers sought over each plot, the relevant land requirement and the works for which it is required. The Applicant has considered reasonable alternatives, including voluntary agreements, alternative sites and modifications to the Proposed Development. Negotiations with affected landowners remain ongoing and the Applicant will continue to seek voluntary agreements wherever possible. The progress of those negotiations is recorded in the Land and Rights Negotiations Tracker. Agreements have been entered into for all Solar Development Sites, and heads of terms have been issued for the majority of the Cable Route Corridor, Site 8 Access Land and Highway Improvement Areas. Where compulsory acquisition powers are exercised, those entitled will be compensated in accordance with the Compensation Code. The Funding Statement [APP-021] confirms that sufficient funds are available to meet those liabilities. The Applicant acknowledges that any adverse effects from the Scheme are more likely to be felt locally than the largely wider-scale benefits of the Scheme. The Scheme is anticipated to help meet the UK’s net zero requirements for energy production, which is considered critical national priority and set out in NPS EN-1 (section 4.2) and EN-3. In addition to meeting the urgent need for secure and affordable low carbon energy infrastructure, the Proposed Development will deliver other benefits, many of which have been maximised and will be delivered as a result of the Proposed Development’s careful design. These are set out in section 7.3 of the Statement of Reasons. The Applicant considers that the compulsory acquisition powers sought are necessary and proportionate. Where practicable, lesser powers of temporary possession will be used, as demonstrated by the revised approach to the plots at Field House Farm.

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REP1-032; REP1-053; REP1-054	D-WR-LI-02	Annette Exley Wendy Tomlinson	Land Interest Specific Feedback	The legal and practical rights position at Field House Farm remains disputed and unresolved, including a caution against first registration, uncertainty over ownership/rights and the fact that the landowner has not granted the rights sought. Respondents question whether compulsory powers should proceed before these matters are resolved.	Through the Applicants Land Referencing and due diligence to date, they have identified those with an interest in the land included within Plots 03-005, 03-005a, 03-006, 03-007, 03-008, 03-008a, 03-009, 03-010, 03-011. Of those plots, 03-008 and 03-008a are currently unregistered. The Applicant is aware of a caution register on this plot and 03-014, however as of the date of this response, the parties listed with an interest in this plot are correct. The Applicant will make any amendments to the Book of Reference [updated alongside this submission] should any changes be required following on-going engagement. The Applicant's ability to utilise the necessary land powers (in this case temporary possession and articles 25 and 27 as relevant) are not precluded by complex land positions.
REP1-042	D-WR-LI-03	Kim Jones	Land Interest Specific Feedback	Greater transparency is requested on compensation to affected residential owners and landowners, including the number of households compensated, categories and total amounts offered or paid, whether confidentiality/non-disclosure agreements have been requested, and whether compensation has been offered to affected homeowners in Wistow.	The Applicant notes the request for information regarding compensation arrangements for affected parties. The Applicant continues to engage constructively with affected parties, including those in Wistow, as set out in the Land and Rights Negotiation Tracker [updated alongside this submission]. Compensation in relation to the Project is governed by the statutory compensation code, including the Planning Act 2008, the Compulsory Purchase Act 1965 and the Land Compensation Acts 1961 and 1973. Any person with a valid claim will be entitled to seek compensation in accordance with the relevant statutory provisions. The nature and extent of compensation will depend on the particular circumstances of the affected party and may include compensation for the acquisition of land or rights, disturbance, severance and injurious affection, and other applicable statutory entitlements. The Applicant is engaged in direct discussions and negotiations with those whose land interests are affected by the Project. The details of these negotiations, including any compensation offers, are confidential between the parties. Where Heads of Terms have been issued and agreed, these provide transparency to the parties involved regarding the basis of the agreement. The Applicant is not requesting affected parties to enter into non-disclosure agreements in relation to compensation discussions. The Applicant will continue to engage with affected parties with a view to reaching agreement wherever possible.

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REP1-054	D-WR-LI-04	Wendy Tomlinson	Land Interest Specific Feedback	Nothing in this representation is intended to limit, waive or define any claim for compensation, costs, injurious affection, disturbance or other entitlement arising from the proposed development or the exercise of any statutory powers.	The Applicant notes the comment made by the respondent.
REP1-036	D-WR-LI-05	George Edward Vincent	Land Interest Specific Feedback	Affected landowners describe the Applicant's engagement as inadequate, including failure to provide meaningful responses to consultation feedback and little or no ongoing communication as the project progressed. They request substantive written responses and re-established dialogue so that their directly affected land interests can be addressed.	The Applicant notes the concerns raised regarding engagement with affected landowners. The Applicant undertook non-statutory consultation between 24 October and 5 December 2024, followed by statutory consultation under section 42 of the Planning Act 2008 between 26 June and 7 August 2025. In addition, the Applicant wrote to affected parties’ known land agents in August 2025 seeking feedback on draft Heads of Terms. Populated Heads of Terms were subsequently issued on 6 November 2025, and engagement has continued, the detail of which can be found in the Land and Rights Negotiation Tracker [updated alongside this submission]. The Applicant continues to engage with affected landowners and their representatives with a view to reaching agreement wherever possible. The Applicant remains committed to maintaining constructive dialogue throughout the examination and determination process and, where relevant, beyond. The Applicant welcomes ongoing discussions with affected parties to better understand, and address land interest matters and seek to mitigate disturbance where reasonably practicable.
REP1-036	D-WR-LI-06	George Edward Vincent	Land Interest Specific Feedback	Affected landowners say they provided details of their circumstances and appointed professional agent early in the process, but the Applicant repeatedly failed to recognise or use the appointed representative, causing delay, confusion and difficulty in protecting their interests.	The Applicant’s appointed agent has been engaging with the respondent’s land agent on the voluntary agreement since August 2025 which is consistent with other Affected Parties. The Applicant remains committed to engaging with the respondent and their agent to progress a voluntary agreement. Updates to ongoing and concluded negotiations to date are provided in the Land and Rights Negotiations Tracker [updated alongside this submission], which is being regularly updated in Examination and demonstrates the Applicants effort to reach voluntary agreements in order to deliver the Scheme.
REP1-036	D-WR-LI-07	George Edward Vincent	Land Interest Specific Feedback	Negotiations over Heads of Terms are described as late, applicant-favoured and insufficiently collaborative, with limited willingness to discuss amendments, development value or extend deadlines. Respondents say this left them with no reasonable alternative but to decline the proposed terms.	The Applicant notes the comment. In reference to the Heads of Terms being late, the Applicant refers the respondent to the 6th response under this theme. The Applicant disagrees that Heads of Terms were issued late. Template Heads of Terms were issued to the respondent’s agent on 12th August 2025. Populated Terms were subsequently issued to both the respondent and their agent on 7th November 2025 which is consistent with most other Affected Parties notwithstanding some which were issued after 7th November 2025 due to Project or Landowner specific matters.

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					The Applicant worked with the respondent’s agent and made a number of concessions on the Heads of Terms in order to reach a voluntary agreement. Following recent engagement from the respondent’s agent, the Applicant is hopeful the outstanding matters of difference can be resolved and a voluntary agreement reached. The Applicant remains committed to reaching a voluntary agreement with the respondent. Progress towards a voluntary agreement is detailed within Land and Rights Negotiations Tracker [updated alongside this submission].
REP1-036; REP1-053	D-WR-LI-08	George Edward Vincent Wendy Tomlinson	Land Interest Specific Feedback	Professional fees incurred by affected landowners are said to remain unpaid despite assurances that reasonable costs would be met, limiting continued professional representation and effective engagement.	As a responsible developer, the Applicant has offered to reimburse the fair and reasonable agent fees of those of whom where rights are sought. The Applicant is working with a large number of agents across the Scheme, and the fee position has been agreed with these agents which demonstrates that it is reasonable. The respondent’s agent is requesting something different to what is being asked and agreed by other agents representing other Affected Parties. Notwithstanding this, the Applicant has offered to discuss reimbursement of fees with the respondent’s agent with a view to reach a resolution in order to move negotiations of the voluntary agreement forwards. The Applicant is awaiting a response from the respondent’s agent on this matter.
REP1-036	D-WR-LI-09	George Edward Vincent	Land Interest Specific Feedback	Personal Circumstances The importance of proper representation and fair engagement has been amplified by our personal circumstances throughout this period. The entirety of our involvement with the project has coincided with the demands, stress and uncertainty associated with traumatic personal circumstances that absorbed most of our time. The appointment of a professional agent was therefore not a matter of convenience but a necessity. We relied upon that representation to ensure our legitimate interests were protected during a particularly difficult period in our lives. Against that background, the repeated failures in communication, recognition of our representative and engagement with our concerns have been especially distressing.	The Applicant has offered to reimburse the fair and reasonable agent fees of those where rights are sought. The Applicant remains committed to, and welcomes engagement with, Affected Parties to better understand areas of concerns and in the instance of the respondent, progress negotiations towards a voluntary agreement.

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REP1-053; REP1-054	D-WR-LI-10	Wendy Tomlinson	Land Interest Specific Feedback	The need and extent of land take around the Field House Farm access and field corner are questioned. Respondents seek clear scaled plans showing the plots, rights and works proposed, justification for the width of the corridor and use of adjoining grazing land, and consideration of reduced or alternative arrangements that would avoid impacts on productive land, boundaries, woodland-edge habitat and farm operations.	Clear, scaled Land, Crown Land and Special Category Land Plans [updated alongside this submission] are in the public domain and can be found on the Planning Inspectorate website. Plans relating to the proposed works can be found within the Works Plans [APP-008]. Justification for the cable corridor width can be found in the Cable Route Method Statement [APP-147] and the Outline Construction Environmental Management Plan [updated alongside this submission]. The Cable Route Corridor access adjacent to Field House Farm has been developed through the design process taking account of highway suitability, safety, access to the site and the need to connect to the existing road network in an efficient and appropriate manner. Alternative access arrangements were considered; however, the identified access is considered to represent an appropriate solution having regard to the characteristics of the local highway network and the overall construction strategy (refer to Appendix A of EN0110012-000591-Written Summary of Applicant's Oral Submissions at CAH1). The access at Field House Farm would be used solely to facilitate construction of the Cable Route Corridor and only for the period required to install this section of the cable. The land use for the Cable Route Corridor would therefore be temporary in nature and, once the cable has been installed, the land would be reinstated to its previous state and use.
REP1-053; REP1-054	D-WR-LI-11	Wendy Tomlinson	Land Interest Specific Feedback	Field House Farm reports repeated failures to provide reliable advance notice and coordination for surveys or project-related visits despite agreed arrangements. Respondents seek clear site-specific notification procedures, professional support and confidence that communication would improve during a more intensive construction phase.	The Applicant notes the concerns raised regarding the notification and coordination of surveys and project-related visits. The Applicant has responded to the separate events in the responses above. In circumstances where surveys are required on land owned or occupied by affected parties, the Applicant would ordinarily seek access through a non-intrusive survey licence, which includes provisions relating to access arrangements and advance notification requirements. In this instance, the affected party has not demonstrated ownership of the land required for the surveys and does not hold the freehold interest in plots 03-008 and 03-008a. Accordingly, the freeholder at Field House Farm was not in a position to grant the Applicant the access rights required to undertake survey activities on those plots. The Applicant therefore did not require a non-intrusive survey licence from the affected party in order to access the relevant land. Notwithstanding this, and as a matter of courtesy, the Applicant's appointed land agent agreed to provide advance notification to the

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					freeholder at Field House Farm prior to any access being undertaken via the access track. It was also offered that surveyors would make contact on the morning of any planned survey activities; however, this offer was declined by the freeholder at Field House Farm. Should development consent be granted, communication and liaison arrangements during the construction phase would be managed through the Outline Construction Environmental Management Plan [updated alongside this submission] (which now includes a specific commitment to engage with Field House Farm and associated management procedures). The Applicant would continue to engage with affected landowners and occupiers regarding access requirements, surveys and construction activities relevant to their land interests.
REP1-054	D-WR-LI-12	Wendy Tomlinson	Land Interest Specific Feedback	The access arrangements at Field House Farm had operated without dispute throughout the many years that my parents and I have lived here. It was only after the Applicant proposed using the lane that detailed questions arose about the ownership and registration of the lane and the rights the Applicant is seeking. This has required substantial investigation, professional advice and Land Registry work that would not otherwise have been necessary. The draft licence is a legal document containing terms and powers I do not fully understand. I appointed a land agent because I need professional advice on matters such as the extent of land required, the rights being requested, access arrangements, compensation and safeguards. When uncertainty arose over payment of my land agent’s fees, I was left trying to deal with complex matters myself. The information affecting Field House Farm is spread across numerous plans, schedules, legal documents and technical reports. I have had to move between different documents to identify the access route, plots, rights sought, works, vehicle types and duration of use. I have not been provided with one consolidated, plain-English explanation and coordinated plan showing everything that may affect the Field House Farm lane, adjoining land, home and businesses. I respectfully ask that the Applicant provide this, with the relevant document and drawing references, and clearly identify any matters that	The Applicant acknowledges that, as is usual with Development Consent Order applications, there are large volumes of documents submitted as part of the application. The Applicant would welcome the opportunity to meet with the respondent to support them in finding the relevant information and explain the rights sought with the hope to progress the voluntary agreement. As a responsible developer, the Applicant has offered to reimburse the respondent in utilising a land agent and has further offered to reimburse the respondent for seeking legal advice. With regards to detailed plans, drawings and explanations of the rights sought, please refer to the response to comment D-WR-LI-10. As already noted, the Applicant would welcome the opportunity to meet with the respondent to support them in finding the relevant information and explain the rights sought

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				remain indicative, optional, or subject to later design.	
REP1-040	D-WR-LI-13	John Nicholas Stoker	Land Interest Specific Feedback	A landowner objects to the proposed cable alignment through the middle of a 6.25-acre field north of Fryston Common Lane, arguing that an alternative alignment along the western side could better avoid flood-risk areas and prevent sterilisation of land intended for future farm buildings and relocation of Priory Park Farm.	As set out in ES Volume 1 Chapter 2: Proposed Development [updated alongside this submission] , the cable route corridor is one aspect of the Proposed Development that requires design flexibility. Decisions are yet to be taken regarding detailed cable routing within the parameters of the Cable Route Corridor. Ongoing engagement with landowners can inform the detailed design stage. New development can take place either side of easements. The only prohibition on development is over an easement area. The Applicant is committed to, and continues to, work with the respondent in respect of development aspiration.
REP1-054	D-WR-LI-14	Wendy Tomlinson	Land Interest Specific Feedback	In addition, parts of this boundary area include long-established farm-made ground and mounding associated with previous agricultural activity. These areas also form part of the actively used grazing field and are regularly used by livestock, including lambs. The full ground composition within these areas may not be fully known and could potentially contain buried rubble, concrete or other historic material, which may create additional complications should intrusive works be proposed within this location.	The Applicant refers the respondent to the Outline Construction Environment Management Plan [updated alongside this submission] specifically table 3 -14, which details measures to mitigate impacts from contaminated land including ground investigation works prior to detailed design to analyse and assess potential contamination sources and ensure appropriate protection measures are incorporated into the construction and operational phases. The Outline Construction Environment Management Plan [updated alongside this submission] also details mitigation measures available, should contamination be unexpectedly encountered during earthworks and construction. If contamination sources are identified, results of sampling and any risk assessments and proposed methods for management/remediation (if required) will be documented and

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					submitted for information to the local planning authority Contaminated Land Officer and The Environment Agency. Notwithstanding the above, if the respondent is aware of any known contamination, the Applicant would encourage the respondent to notify the Applicant of its location.
REP1-054	D-WR-LI-15	Wendy Tomlinson	Land Interest Specific Feedback	Incident 1 – Unannounced Access Route Survey Date: Tuesday, 2 September 2025 Company: Dalcour Maclaren (acting for Island Green Power / Light Valley Solar) Description Two representatives, later identified as Lizzie Hall and "Rob", were observed walking down the access lane serving Field House Farm. They appeared to be surveying the lane, taking notes and measurements in connection with the proposed cable route access. Communication No prior notification was provided before the visit and no request was made to advise that surveyors would be attending. An email was sent the same day raising my concerns. In a reply dated 5 September 2025, Lizzie Hall stated: "I have issued to the survey team and requested you are notified via email of any further access requests." Impact • Unknown individuals were present on the access lane without prior notification. • Security beams were activated and CCTV recorded the visit. • Surveyors parked within the passing place/no-parking area. • I was required to interrupt my work to establish who they were and why they were present.	The Applicant notes the comments and concern raised by the respondent. The Applicant's appointed land agent did attend site on 2 September 2025. No prior notification was provided, as set out by the respondent. The Applicant does not agree with the suggested impacts. The Applicant's land agent introduced themselves, explained the reason for the visit, that they were in the area on other work, and checked that where they had parked was acceptable as there was no signage to notify visitors of parking being prohibited. For clarity, no access was taken onto land that was within the ownership of the respondent, and no measurements were taken during the visit on 2 September 2025. Notwithstanding the above, feedback from the respondent was collected, and prior notification protocol moving forward was established out of courtesy to the respondent.

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REP1-054	D-WR-LI-16	Wendy Tomlinson	Land Interest Specific Feedback	Incident 2 – Courtesy Notification: Badger Survey Date: Email dated 4 September 2025 – survey undertaken 8 September 2025 Description Harry Smith advised by email that a badger survey would be undertaken and provided vehicle details. Comments This notification was appreciated and allowed appropriate arrangements to be made. However, it remained an informal courtesy notification rather than an agreed access protocol or formal notification procedure.	The Applicant notes the comment. As previously illustrated in the response to comment D-WR-LI-11, the Applicant provided approximately 96 hours' advance notice of the proposed survey, together with a plan identifying the survey area, in accordance with the notification arrangements then in place for Field House Farm. The Applicant therefore considers that reasonable advance notice and coordination were provided for this survey.
REP1-054	D-WR-LI-17	Wendy Tomlinson	Land Interest Specific Feedback	Incident 3 – Vehicle Parked Outside the House Date: Tuesday, 9 September 2025 Company: Dalcour Maclaren Description A vehicle displaying a "Light Valley Solar" notice was parked outside the farmhouse while surveyors walked down the lane. Harry Smith later apologised and confirmed he was unsure why the vehicle had been parked there. Impact • Unnecessary concern regarding the identity and purpose of the vehicle. • Demonstrated a lack of coordination regarding parking arrangements. • Required further communication to establish what was happening.	The Applicant recognises the concern and apologises for the disturbance caused. No access was taken onto land that was within the ownership of the respondent Notwithstanding this, the Applicant remains committed to maintaining effective communication and coordination with affected parties during survey and project-related activities.

Reference ID	Comment Reference	Interested Party	Theme	Summary of Issue Raised	Applicant's Response
REP1-054	D-WR-LI-18	Wendy Tomlinson	Land Interest Specific Feedback	Incident 4 – Tree Survey and Hedge Photography Date: Email dated 3 October 2025 – surveys planned between 6–8 October 2025 On 3 October 2025, Harrison Smith emailed to advise that tree surveys were planned to take place between 6 and 8 October 2025 and that surveyors would be walking down the access lane serving Field House Farm. This represented an improvement on previous occasions where no notification had been provided and demonstrated that the Applicant recognised the need to notify me before survey teams attended. However, the notification only provided a three-day survey window rather than confirming the actual day or time of attendance. When I subsequently encountered a surveyor photographing my boundary hedgerow, I had not been informed that surveyors would be present on that particular day. I therefore had no way of knowing whether the individual was authorised or why photographs were being taken until I challenged him and later contacted Harrison Smith. Impact • Required interruption to my work. • Photography of boundary features without any explanation at the time. • Continued uncertainty regarding who was present and why. • Demonstrated that broad survey windows were insufficient for a property operating secure commercial premises.	The Applicant notes the comment. As described in the response to comment D-WR-LI-11 of this document, the Applicant provided advance notification of the proposed survey activities and offered for surveyors to make direct contact on the morning of any planned surveys. This offer was declined by the freeholder at Field House Farm. In the circumstances, the Applicant considers that reasonable notification and coordination arrangements were in place. Notwithstanding this, the Applicant remains committed to maintaining effective communication and coordination with affected parties during survey and project-related activities.

Reference ID	Comment Reference	Interested Party	Theme	Summary of Issue Raised	Applicant's Response
REP1-054	D-WR-LI-19	Wendy Tomlinson	Land Interest Specific Feedback	Incident 5 – Geophysical Survey Without Advance Notification Date: 6 November 2025 Description On the morning of 6 November 2025, I observed a white van drive down the single-track lane serving Field House Farm before reversing and stopping near the woodland. Initially, I believed the occupants may have taken a wrong turning or been making a delivery. As the vehicle remained on the lane, I became increasingly concerned because I had received no prior notification that surveyors would be attending. Given the security requirements associated with the caravan and motorhome storage business, I took my mobile phone with me to record the incident should any security issue arise. When I approached the occupants, they explained they were undertaking geophysical surveys on behalf of the Light Valley Solar project. I immediately contacted Harrison Smith to ask why no advance notification had been provided. Later the same day, Harrison Smith replied: "The geo phys team have turned up this morning... but have not let us know what day they were actually going to one of the fields behind your house... We normally get told when in the week they will be accessing as to provide updates to yourself and avoid this disturbance." He also confirmed: "I will be in further contact with the survey team to provide more accurate dates of surveys taking place..." This email acknowledged that the agreed communication process had not been followed. Impact • I was again required to interrupt my work to investigate unfamiliar vehicles and individuals. • Until I spoke with the survey team, I had no means of knowing whether they were authorised to be there.	The Applicant recognises the concern and apologises for the disturbance caused. The Applicant remains committed to maintaining effective communication and coordination with affected parties during on-going survey and project-related activities.

Reference ID	Comment Reference	Interested Party	Theme	Summary of Issue Raised	Applicant's Response
				• The incident caused unnecessary concern regarding the security of the storage facility and surrounding property. • The Applicant's own representative subsequently acknowledged that notification procedures had failed.	

Reference ID	Comment Reference	Interested Party	Theme	Summary of Issue Raised	Applicant's Response
REP1-054	D-WR-LI-20	Wendy Tomlinson	Land Interest Specific Feedback	Incident 6 – Ecology Survey Notification Failure Date: 15 January 2026 Description Earlier that week, ecologists attended the fields behind Field House Farm without the advance notification that had previously been promised. Following my concerns being raised, Harrison Smith emailed on 15 January 2026 stating: "Apologies on the ecologists turning up this week I believe it was, I was on Annual Leave when the access calls / emails had been sent out." He also advised that further geophysical surveys were planned for the following week and provided anticipated vehicle details. Impact • Demonstrated that notification failures continued despite previous assurances. • Required further communication to establish what survey activity was taking place. • Reinforced concerns regarding the reliability of the Applicant's notification procedures.	The Applicant recognises the concern and apologises for the disturbance caused. The Applicant remains committed to maintaining effective communication and coordination with affected parties during survey and project-related activities.