Light Valley Solar

08.19 The Applicant's Response to Submissions Received at Deadline 1 - Parish Councils and Non-Statutory Organisations

Document Reference: EN0110012/APP/LVS/08.19

September 2026

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

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Infrastructure Planning

Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010

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Deadline 2 Submission

The Applicant's Response to Submissions Received at Deadline 1 - Parish Councils and Non-Statutory Organisations

Regulation Reference	The Infrastructure Planning (Examination Procedure) Rules 2010 Rules 8(1)(c)
Planning Inspectorate Case Reference	EN0110012
Application Document Reference	EN0110012/APP/LVS/08.19
Author	Light Valley Solar Limited

Version	Date	Status of Version
1.0	September 2026	Deadline 2 Submission

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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 parish councils and non-statutory organisations 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
- 08.20 The Applicant's Response to Submissions Received at Deadline 1 - Members of the Public

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]**.
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- **Table 1-2: Listed Organisations whose submissions are Responded to in Section 2 – Parish Councils** lists the town councils, parish councils and parish meetings that have submitted comments. These submissions are presented and responded to in **Section 2** of this document.
- Error! Reference source not found. sets out the notable parties and non-statutory organisations that have submitted comments. These submissions are presented and responded to in **Section 3** of this document.

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 Document

Term of Abbreviation	Definition
DCO	Development Consent Order
CR	Consultation Report (shorthand for appendices)

Term of Abbreviation	Definition
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 – Parish Councils

Examination Library Reference	Relevant Representation Received From
REP1-017	West Haddlesey Parish Meeting
REP1-012	Riccall Parish Council
REP1-015	Thorganby Parish Council
REP1-009	Hambleton Parish Council
REP1-010	Hillam Parish Council
REP1-011	Monk Fryston Parish Council
REP1-013	Skipwith Parish Council
REP1-014	South Milford Parish Council

Table 1-3: Listed Organisations whose submissions are Responded to in Section 3 – Non Statutory Groups

Examination Library Reference	Relevant Representation Received From
REP1-028	British Horse Society
REP1-041	Keir Mather MP
REP1-029	Sherburn Aeroclub

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

Reference ID		Interested Party	Theme(s)	Comment	Applicant Response
West Haddlesey Parish Meeting					
REP1-017	WR-WHPM-01	West Haddlesey Parish Meeting	Traffic and Movement	**Overall suitability of the proposed West Haddlesey route** We have specific and substantive concerns about the proposal by LVS to use the route from A19 at Chapel Haddlesey, through West Haddlesey to Site 4 at Birkin. This route is proposed to be the primary construction route and also one of the Cable Corridor routes. We consider it is unsuitable for both purposes. Use of this route will have an unacceptable impact on highway safety and poses a significant risk to road users on the A19 and also to road users and pedestrians on the unclassified road from the A19 through West Haddlesey to Site 4. In particular this route is unsuitable for the proposed HGV traffic and the volume of worker traffic. The combined effect of the additional HGV traffic and worker traffic will pose a danger to road users and pedestrians and will significantly degrade the amenity of those living along the route as well as recreation road users.	The Applicant notes these comments. In identifying the construction access routes, the access strategy for the **Transport Assessment [updated alongside this submission]** considered a range of factors, including consideration of existing baseline traffic conditions and data available on road traffic collisions. Traffic surveys undertaken in January and February 2025 recorded an average of 29 HGV movements per weekday at the count location in West Haddlesey near the junction with Pale Lane, with an average of 24 HGV movements per day across the full week. This demonstrates that the route already accommodates HGV traffic. With regards to highway safety, there is no published data to indicate existing safety issues on the route. The route through West Haddlesey benefits from footways on at least one side of the carriageway, providing separation between pedestrians and vehicles. At Tankards Bridge, where the carriageway narrows, good forward visibility enables drivers to see and respond to approaching vehicles appropriately. If all Solar Development Site 4 traffic travels via West Haddlesey, the **Transport Assessment [updated alongside this submission]** forecasts that the overall temporary traffic increase would be on average 15%, with an increase in HGV traffic composition of 26%. The temporary increase in traffic flows and composition has been assessed and the **Transport Assessment [updated alongside this submission]** concluded that any temporary impacts from the Proposed Development could be managed through measures detailed in the **outline Construction Traffic Management Plan (oCTMP) [updated alongside this submission]**, and there are not expected to be any long-term significant impacts on the transport network.

Reference ID		Interested Party	Theme(s)	Comment	Applicant Response
REP1-017	WR-WHPM-02	West Haddlesey Parish Meeting	Traffic and Movement	**Chapel Haddlesey crossroads: physical highway-safety risks** The Chapel Haddlesey Crossroads on the A19 have been recognised locally as an accident blackspot for many years. The turn to West Haddlesey is a tight left-hand bend. Houses are present on both sides of Millfield Road at this junction. The houses have limited off road parking and therefore cars are often parked on the side of the road. These parked cars can impede vehicles turning into Millfield Road especially HGVs on what is already a tight turning radius. This is especially a problem if two large vehicles meet at the junction, one turning in and one turning out. An HGV waiting to turn left into Millfield Road and stationary on the A19, is a high risk as northbound vehicles often come over the Aire bridge in excess of the 40 MPH limit and fail to anticipate queued traffic just over the brow of the bridge. Large slow-moving HGVs pulling out from Millfield Road need time to enter the carriageway and accelerate. Slight mis-timing coupled with the known speeding issues at the crossroads could easily result in a collision.	The Applicant notes these comments. The **Transport Assessment [updated alongside this submission]** includes a road safety review using data that is publicly available. The available data relates to collisions on public roads that are reported to the police, and subsequently recorded, using the STATS19 collision reporting system. The available data does not indicate an accident cluster at the A19/Millfield Road junction.
REP1-017	WR-WHPM-03	West Haddlesey Parish Meeting	Traffic and Movement	**Chapel Haddlesey crossroads: accident evidence and CrashMap data** The CrashMap data does not reflect fully the accidents that have occurred at the crossroads. Significant and potentially serious non-injury accidents have occurred and these are not present in the CrashMap data. The Parish identifies additional incidents on 23 October 2021 and 13 February 2022, a fatal accident on 19 June 2026, reported accidents on 22 June and 15 September 2023, and the destruction of the crossroads bus shelter in May 2019 as evidence supporting these points. None of these accidents are recorded in the CrashMap data set and we may not have captured all additional accidents. We contend that there is a significant cluster of accidents at the A19 crossroads that the applicant's submission does not identify. We consider the risks at the crossroads are significantly underestimated. We understand that North Yorkshire Council does not use CrashMap data as they consider it underestimates significant accidents given its focus on accidents resulting in injury. North	The Applicant notes these comments and the feedback provided by West Haddlesey Parish Meeting. The **Transport Assessment [updated alongside this submission]** includes a road safety review 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. The available STATS19 data does not identify a collision cluster at the A19/Millfield Road junction. Whilst the Applicant acknowledges that other incidents may have occurred on the local highway network, the assessment can only be based on recorded collision data. The Crashmap data referenced is derived from the same STATS19 dataset, which records collisions reported to the police.

Reference ID		Interested Party	Theme(s)	Comment	Applicant Response
				Yorkshire Council (NYC) use their STATS19 Collison data in preference.	
REP1-017	WR-WHPM-04	West Haddlesey Parish Meeting	Traffic and Movement	**North Yorkshire Council consideration of crossroads risk and implications for route selection** We ask that Examiners consult with NYC on the risks posed at the Chapel Haddlesey crossroads and specifically consider the locally well-known dangers posed by the Chapel Haddlesey crossroads. Taken together with the presence of high and medium receptors along the proposed route, which we will address later, we consider there is a compelling rationale to avoid this route given there is at least one other reasonable alternative route available – as Set out in Section 2.4 and Supporting Document 3.	The Applicant notes this comment. As outlined in the **Transport Assessment [updated alongside this submission]**, any temporary impacts arising from the Proposed Development can be effectively managed through the measures set out in the **outline Construction Traffic Management Plan (oCTMP) [updated alongside this submission].** Accordingly, no significant long-term impacts on the route through West Haddlesey are anticipated. In response to ISH1-15 in Action Points from **Issue Specific Hearing 1 (ISH1) [EV5-010]**, the Applicant has provided further details on the access route selection process for Solar Development Site 4 as part of the construction access strategy. The review is presented in Appendix B of **Written Summary of Applicant's Oral Submissions at ISH1 [REP1-004]** and concludes that the selected route via West Haddlesey was assessed to be the most appropriate eastern access route for construction traffic, subject to the controls and mitigation secured through the final CTMP.
REP1-017	WR-WHPM-05	West Haddlesey Parish Meeting	Traffic and Movement	**Heavy Commercial Vehicle Prohibition Order** Concerns about the suitability of these unclassified roads for Heavy Commercial Vehicles have been recognised by North Yorkshire Council who on 15 June put in place a 'Heavy Commercial Vehicle Prohibition Order' for goods vehicles over 7.5 tonnes. The Parish quotes the rationale for the Order as the roads being narrow, containing significant bends and lacking sufficient carriageway capacity, with restricted visibility, limited passing space and conflict on tight bends. It acknowledges that the Order would not itself prevent construction traffic using the route if the application were approved. Although not prohibiting construction vehicles, we consider this is a tacit acknowledgement by North Yorkshire Council that these roads are inherently unsuitable for HGV traffic. We maintain that it supports an overall conclusion that the route is unsuitable for HGVs.	The Applicant notes this comment and is aware of the Traffic Regulation Order that came into force on 15 June 2026 and prohibits HGVs from various local roads, with a range of exceptions. These exceptions include for the purpose of access and for laying apparatus for the supply of electricity. As such, it is likely that the Proposed Development will benefit from these exceptions. Even if this were not the case, then article 16 of the draft DCO enables the Applicant to vary the Order so that this does not apply to the Proposed Development. This is further discussed in the **Applicant's Summary of Oral Submissions at ISH1 [REP1-004]**. The Applicant has assessed this construction route and is confident 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 (oCTMP) [updated alongside this submission]**, including the concerns identified by the Parish Meeting.

Reference ID		Interested Party	Theme(s)	Comment	Applicant Response
REP1-017	WR-WHPM-06	West Haddlesey Parish Meeting	Traffic and Movement	**Failure to identify receptors and route characteristics** LVS failed to identify the high and medium receptors present along the route from Chapel Haddlesey through West Haddlesey. They did not identify the: 'doorstep green' recreation park; the Village Hall; the Primary School; the Children's Playground. Their February 2026 documents do not take full account of the narrow and, in areas, absent footways near these receptors nor the school opening hours or use of the recreation park and the playground throughout the day. The single lane Tankard's Bridge was not mentioned. This Grade 2 listed bridge has no footway and is at a point where two other footpaths meet. It links the villages and is the only crossing point for pedestrians. No reasonable explanation has been provided by the applicant for the omission of these receptors. We consider this is indicative of a poor and cursory desk top assessment that undermines the credibility and reliability of the transport planning, especially as LVS was informed of the presence of most of these receptors in mid-2025 – directly with Annette Lardeur of Island Green Power at the Hambleton Consultation meeting on 15 July 2025 and via e-mail to LVS feedback on 7 August 2025.	The Applicant makes note of these comments and can confirm that previous communication has taken place in April 2026 with West Haddlesey Parish Council addressing their comments on the sensitivity classification of this route. The assignment of route sensitivity is informed by various factors. The IEMA guidance identifies the factors that should be considered - and this includes the location of schools and recreational areas. It outlines that the relationship between these receptors and with the highway environmental should be examined to understand the sensitivity of those receptors to change noting that, for example, pedestrians are less sensitive to changes in traffic if there are adequate footways and crossing facilities. There is a footway on at least one side of the road through West Haddlesey, except for where the road crosses the canal at Tankards Bridge. It is recognised that this is a pinch point on the route but vehicles approaching and using the bridge have good forward visibility. That said, the Applicant accepted that, on balance, part of the route through West Haddlesey could reasonably be considered to have a higher sensitivity to traffic changes. However, even where a higher sensitivity classification is assumed, the small increase in HGV movements associated with the Proposed Development means that the overall conclusions remain unchanged, following the application of industry assessment guidance. Table 2-1 in the **Transport Assessment [updated alongside this submission]** outlines the baseline traffic flows associated on assessed links, showing that Haddlesey Road / Birkin Road accommodates HGV movements at present. Therefore, the baseline condition already includes interaction between large vehicles and local users, and the relatively small and temporary increase associated with the Proposed Development is not expected to materially change the existing level of risk. Furthermore, 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 through the DCO. These measures are applied across the full project site, and include: • Scheduling deliveries to avoid peak travel periods, including the school pick up and drop off times. This commitment would also avoid the breakfast club timescales and be ahead of the pickup times for afterschool clubs when parents are dropping off or collecting children. • Clear signed routing for construction vehicles.

Reference ID		Interested Party	Theme(s)	Comment	Applicant Response
					• Contractor management procedures, including strict penalties for drivers who do not comply with standards. • Temporary speed management measures, to be agreed with the North Yorkshire Council. • The provision of banksmen at access points to warn all road users, including pedestrians and cyclists, of the potential presence of construction vehicles to reduce the potential for conflicting movements and ensure safe interaction with other road users.
REP1-017	WR-WHPM-07	West Haddlesey Parish Meeting	Traffic and Movement	**Doorstep Green and tight bends** Doorstep Green is used for picnics, village events, as an area for family recreation and games such as rounders. Note the poor sightline and narrow footway (bearing in mind this is the only pedestrian route to and from the main bus stop on the A19). Vehicles can be encountered parked close to the bend as there is limited off road parking for the houses. One of the entrance/exit points to the Doorstep Green Park is shown, as is the absence of a footway on the park entrance/exit side. Pedestrians have to cross the road on the bend at the dropped kerb to access the park.	The Applicant notes this comment. Table 2-1 in the **Transport Assessment [updated alongside this submission]** outlines the baseline traffic flows associated with the assessed links, showing that Haddlesey Road / Birkin Road accommodates HGV movements at present. The 2025 traffic surveys identified a weekday average of 29 HGV movements through West Haddlesey, which reduces to an average of 24 movements on average when including weekends. Therefore, the baseline condition already includes interaction between large vehicles and local users of these facilities, and the relatively small and temporary increase associated with the Proposed Development is not expected to materially change the existing level of risk.
REP1-017	WR-WHPM-08	West Haddlesey Parish Meeting	Traffic and Movement	**Primary School and Village Hall: pedestrian safety and proposed mitigation** The Village Hall has limited parking and its capacity is often exceeded during events and always during school drop-off and pick up times. Parked cars effectively reduce the road to a single carriageway for some distance with the risk of children emerging from between parked cars. There is no footway along from the school. Parents and children walking to and from the school must cross the road to access the school from the narrow footway. We consider the intrinsic problems with this route cannot be readily managed. LVS state that deliveries will be scheduled to avoid peak travel periods, with no deliveries allowed before 9.30am and after 4.30pm. Given the school's published hours are readily available – it opens at 7.45 am with registration at 8.50am and it closes at 3.30 pm with an after-school club on site that runs until 5.30pm – the mitigation proposed by LVS on deliveries is inadequate. Additionally, there will be risks associated with the significant	The Applicant makes note of these comments. The **Transport Assessment [updated alongside this submission]** considers the change in traffic flows and composition and concludes that the temporary increase in traffic is not expected to materially change the existing level of risk, 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 (oCTMP) [updated alongside this submission].** The **oCTMP [updated alongside this submission]** includes timing restrictions to avoid the core school pick up and drop off times. In response to ISH1-15 in **Action Points from Issue Specific Hearing 1 (ISH1) [EV5-010]**, the Applicant has provided further details on the access route selection process for Solar Development Site 4 as part of the construction access strategy. The review is presented in Appendix B of **Written Summary of Applicant's Oral Submissions at ISH1 [REP1-004]** and concludes that the selected route via West Haddlesey was assessed to be the most appropriate eastern access route for construction traffic, subject to the controls and mitigation, which will be able to be considered with NYC secured through the final CTMP.

Reference ID		Interested Party	Theme(s)	Comment	Applicant Response
				volume of worker transport and cars passing the school. Vulnerable road users such as parents with children, especially those in push chairs, may be present during the day accessing the Post Office, Children's Playground, Village Hall events and Doorstep Green Park or walking to the bus stop on the A19 (as would elderly residents). These individuals walking on narrow footways which switch from one side of the road to the other are equally at risk and deserve due consideration.	
REP1-017	WR-WHPM-09	West Haddlesey Parish Meeting	Traffic and Movement	**Tankard's Bridge accident history** Vehicle accidents have occurred on this bridge and in 2020 a large vehicle hit the parapet necessitating the closure of the Selby Canal for several months because of the risk to boats while the bridge awaited repair.	The Applicant notes this comment. Whilst the Applicant recognises the concerns raised, the collision does not demonstrate an existing highway safety issue. The bridge benefits from good forward visibility for approaching drivers, providing adequate opportunity to identify and respond to its presence. In the absence of any identified pattern of similar incidents, the available evidence suggests that the likelihood of an HGV colliding with the bridge parapet is low under normal driving conditions and where vehicles remain within the carriageway. The **Transport Assessment [updated alongside this submission]** can only take into account evidence of a pattern or concentration of collisions that would indicate an underlying road safety concern, which is not evident from the available collision data.
REP1-017	WR-WHPM-10	West Haddlesey Parish Meeting	Traffic and Movement	**West Haddlesey village: pedestrians and roadside receptors** Cars are parked along the road and on occasions large groups of parents and children meet up at the Playground which, in addition to play equipment, contains a small football pitch and picnic benches. In SD2 Figure 23 the George and Dragon Pub/Restaurant can be seen. This is a short distance from the playground and there is often pedestrian traffic between the two. Note also the absence of a footway at the Pub and restricted visibility from the car park westwards. Fear and intimidation are already a concern, especially for the elderly and parents with small children and pushchairs, when large tractors and other heavy traffic pass along this section. The use of this road as a construction route for Site 4 and the Cable Corridor will significantly increase that concern. A busy farm entrance and Post Office are located in this part of the village. SD2, Figure 26 shows the Post Office. Open three mornings a week it is well used with cars stopping and parking on the road and pedestrians walking from houses in the village and from Chapel Haddlesey. Again, there is no footway on the southern side of the road so users must cross to reach the Post Office.	The Applicant makes note of these comments. The **Transport Assessment [updated alongside this submission]** considers the change in traffic flows and composition and concludes that the temporary increase in traffic is not expected to materially change the existing level of risk, 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 (oCTMP) [updated alongside this submission].** In response to ISH1-15 in **Action Points from Issue Specific Hearing 1 (ISH1) [EV5-010],** the Applicant has provided further details on the access route selection process for Solar Development Site 4 as part of the construction access strategy. The review is presented in Appendix B of **Written Summary of Applicant's Oral Submissions at ISH1 [REP1-004],** and concludes that the selected route via West Haddlesey represents the most appropriate eastern access route for construction traffic, which will be able to be considered with NYC, subject to the controls and mitigation secured through the final CTMP.

Reference ID		Interested Party	Theme(s)	Comment	Applicant Response
REP1-017	WR-WHPM-11	West Haddlesey Parish Meeting	Traffic and Movement	**Saturday construction traffic and weekend working** We also note that construction work and vehicle movements are planned for Saturday mornings. This is the peak time for recreational use of the area including by cyclists and horse riders. This will present a high risk of accidents. We consider that over the whole area of unclassified roads there should be significant restrictions imposed on any weekend work to ensure safe recreational use and to allow residents of all villages in the area covered by the LVS application to peacefully enjoy their weekend.	The Applicant makes note of these comments. The **outline Construction Traffic Management Plan (oCTMP) [updated alongside this submission]** includes restrictions on construction working hours, with activities on Saturdays limited to 08:00 to 13:30. Given the shorter working period, construction activity on Saturday's is expected to be lower than on weekdays. However, limited Saturday working is required to maintain an efficient construction programme and avoid unnecessarily extending the overall duration of the works. Restricting Saturday working could prolong the construction period, resulting in temporary construction-related impacts being experienced over a longer timeframe. The proposed approach therefore seeks to balance the need to minimise disturbance to local communities with the objective of completing the construction works as efficiently as possible.
REP1-017	WR-WHPM-12	West Haddlesey Parish Meeting	Traffic and Movement	**Incorrect HGV baseline and reliability of traffic assessment** The Applicant's February 2026 documentation, relating to transport planning, has a baseline figure of 50 HGVs per day travelling on the Haddlesey Road, the main route to Site 4. As a result of queries raised by our Parish, the applicant confirmed, in April, that the baseline figure was incorrect and should have been 9 and not 50 HGVs. This is not a minor rounding error but a fundamental flaw and just one example of the unreliable assessment of traffic which we have seen across all Sites. Although this error is acknowledged by LVS in their June 2026 response to Relevant Representations (part 1), in that same document they repeatedly refer back to tables in the February 2026 documentation, containing the baseline error, in support of their traffic assessment (this also true of their Part 2 document). Construction traffic would, at a minimum, double the number of HGVs on this route. We ask that Examiners reconsider the construction route in the light of the corrected documents and the additional information presented in this document.	The Applicant makes note of this comment and can confirm that a letter has been issued to West Haddlesey Parish Council on 17 April 2026 thanking the Parish Council for identifying the issue and confirming that the correct baseline flow for Link 7 (Haddlesey Road at Birkin – see Figure 14.5 **[APP-114]**) is 9 HGVs rather than 50 as previously reported. At Link 8, through West Haddlesey village, the average recorded flow was 24 HGV movements per day across the survey week (including weekends), increasing to an average of 29 HGV movements per weekday. The assessment correctly identified that construction traffic would result in a 26% increase in HGV traffic at this location. The error relating to Link 7 has been corrected in the updated **Transport Assessment [updated alongside this submission]** This correction does not alter the conclusions of the assessment in relation to West Haddlesey village.

Reference ID		Interested Party	Theme(s)	Comment	Applicant Response
REP1-017	WR-WHPM-13	West Haddlesey Parish Meeting	Traffic and Movement	**HGV vehicle categories** We note that no breakdown of HGVs by category is provided for any proposed Site by LVS. There is clearly a material difference in risk posed by a 7.5-tonne rigid van and a 44-tonne articulated lorry. It is difficult to understand how the applicant can reliably state the projected increase in the number of HGVs without having some idea of the category and capacity of vehicles required given they know the scale of development, the construction period and material that will need to be delivered. We ask the Examining Authority to require an outline breakdown of the HGV categories. This should be done for all Sites. Currently most HGV traffic through West Haddlesey is delivery vans, small lorries and farm traffic. Large articulated lorries are infrequent. We have asked the applicant to provide a breakdown of the HGV categories that will pass along the route to Site 4.	The Applicant notes this comment and can confirm that the assessment has adopted a worst-case assumption that the majority of HGV movements will be undertaken by articulated lorries. In practice, the construction traffic is likely to comprise a mix of vehicle types, including rigid HGVs, articulated HGVs, vans and other construction vehicles, depending on the stage of the works and the materials being transported. As a result, the assessment is considered to provide a precautionary representation (given the nature of articulated HGVs as compared to vans and other vehicles) of the potential impacts associated with construction traffic.
REP1-017	WR-WHPM-14	West Haddlesey Parish Meeting	Traffic and Movement	**Traffic forecasting methodology and application-specific estimates** The LVS documentation is opaque and doesn't allow a full picture of total traffic on this and surrounding roads. At present during total construction 9-12 two-way daily HGV movements are estimated for Site 4 and between 91 and 182 two-way car/LGV movements. The predicted traffic volumes are based on information from other similar projects. Generic estimates are often unreliable. Estimates based on what is being actually constructed at these LVS sites, the specific requirements and construction timescales, are required. We ask that the Examiners consider this further with LVS and seek more detailed and reliable estimates for this specific application given it is fundamental to decisions on traffic and transport.	The Applicant notes this comment. Construction traffic forecasts were developed by the Applicant using expected quantities of construction materials and logistics requirements associated with the Proposed Development. This includes a realistic breakdown of anticipated construction activities and materials, such as aggregate and access tracks, solar modules and associated footings, fencing, excavation works and waste movements. In developing the forecasts, the Applicant also drew upon information and experience from comparable solar farm developments, including projects being progressed by the Applicant, and experience developing TCPA projects (with appropriate adjustments for scale) to inform reasonable assumptions where detailed contractor information is not yet available. The forecasts take account of factors including the generating capacity of the Proposed Development, anticipated material requirements, waste excavation and the duration and phasing of the construction programme. As would be expected, a shorter or more intensive construction programme could result in a higher number of daily HGV movements, whereas a longer programme spreads deliveries over a greater period. The forecast traffic volumes have been developed using the information available at this stage of the project and anticipated programme. They represent estimated peak construction traffic flows and have been assessed on a reasonable worst-case basis for Environmental Impact

Reference ID		Interested Party	Theme(s)	Comment	Applicant Response
					Assessment purposes. They are therefore considered to provide a robust and reasonable basis for assessing the likely transport impacts of the Proposed Development.
REP1-017	WR-WHPM-15	West Haddlesey Parish Meeting	Traffic and Movement	**Gateforth as an alternative route** As this route is already deemed acceptable by LVS for HGVs and worker traffic we consider that this route would provide an alternative construction route to Site 4 rather than the route from the A19 through West Haddlesey. The sightlines at this junction are clear and do not present the same high risk as the Chapel Haddlesey crossroads. The only receptors along the road are Selby Golf Club and Gateforth Park (residential park homes) both of which are well set back from the road and both have entrances/exit points with good sightlines on an unobstructed straight road. Gateforth itself has no high or medium receptors nor any single lane bottleneck. We still consider these unclassified roads to be, by their nature, unsuitable for the proposed LVS construction traffic but recognise this route would significantly reduce the risk to all road users and pedestrians compared with the routing from the Chapel Haddlesey crossroads through West Haddlesey.	The Applicant makes note of these comments. The route from the A63 via Gateforth is identified within the **outline Construction Traffic Management Plan (oCTMP) [updated alongside this submission]** as a construction route for access to the Cable Route Corridor. A Technical Note has been prepared for Deadline 1 - Written Summary of **Applicant's Oral Submissions at ISH1 [REP1-004]** - to provide further details on the access route selection process as part of the construction access strategy.
REP1-017	WR-WHPM-16	West Haddlesey Parish Meeting	Traffic and Movement	**Justification and comparative assessment of alternative routes** We are awaiting the LVS justification for the choice of the current routing though West Haddlesey (action point ISH1-15) and their rationale for excluding other alternative routes. We ask that the Examiners consider our information on this alternative route and, if necessary, pose further questions to LVS if necessary to determine why it is not a reasonable and safer alternative especially given the concerns raised in this document about the safety of the route through West Haddlesey. We would wish to see a detailed comparative assessment of alternative routes. We consider there is a duty to protect road users and pedestrians and consider the Gateforth route presents a much lower risk.	The Applicant notes this comment and would advise that in response to ISH1-15 in Action Points from **Issue Specific Hearing 1 (ISH1) [EV5-010]**, the Applicant has provided further details on the access route selection process for Solar Development Site 4 as part of the construction access strategy. The review is presented in Appendix B of **Written Summary of Applicant's Oral Submissions at ISH1 [REP1-004]**.

Reference ID		Interested Party	Theme(s)	Comment	Applicant Response
REP1-017	WR-WHPM-17	West Haddlesey Parish Meeting	Traffic and Movement	**Adequacy and basis of LVS's route assessment** Our view remains that LVS has only conducted a superficial desk top study of the route to Site 4 and have failed to identify the significant hazards and risks posed to residents, road users and others. It is apparent that the main imperative from LVS's perspective is the availability of land and ease of access from the M62 motorway and A19 to Site 4 via the shortest route possible, irrespective of the significant risks posed by the chosen route. We consider LVS have been narrowly focused on their economic requirements to the exclusion of the interests of the affected communities when preparing their transport plans.	The Applicant notes this comment and can confirm that the construction access strategy was not focussed on financial implications but was developed following consideration of a range of operational, environmental and highway factors. As part of the route selection process, design workshops were held in Riccall and Hambleton 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.
REP1-017	WR-WHPM-18	West Haddlesey Parish Meeting	Traffic and Movement	**Overall construction traffic volumes and route suitability** If they accept this route – using the minimum predicated figures of 9 two-way HGV trips per day and 91 LGV/car two-way trips per day with the estimated 721-day construction period – this will result in a minimum of 6,489 HGV and 65,611 LGV/car two-way trips along a route that presents clear risks to road users and pedestrians. Taking the concerns about the A19 crossroads together with the number and nature of high and medium receptors along the route; the bottleneck of Tankards Bridge; the narrow footways and single lane bridge; the West Haddlesey Parish Meeting consider this is neither a suitable route for HGVs nor for the proposed large number of cars and light goods vehicles that would bring workers to Site 4. Given the fundamental issue of safety to road users and pedestrians, routing should not be dictated by convenience, time saving or simplicity for the applicant. Minimising risk to our communities is paramount. In this case we consider there is compelling evidence of a significant risk to road users and pedestrians from the chosen route.	The Applicant makes note of these comments. The **Transport Assessment [updated alongside this submission]** adopts a worst-case assumption that all construction traffic associated with Solar Development Site 4 would route via the A19, through West Haddlesey and across Tankards Bridge. In practice, some trips serving the northern access points to Solar Development Site 4 may utilise alternative construction routes, resulting in fewer vehicle movements through West Haddlesey than those assessed. The **Transport Assessment [updated alongside this submission]** considers the change in traffic flows and composition on this worst case basis and concludes that the temporary increase in traffic is not expected to materially change the existing level of risk, 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 (oCTMP) [updated alongside this submission].**

Reference ID		Interested Party	Theme(s)	Comment	Applicant Response
REP1-017	WR-WHPM-19	West Haddlesey Parish Meeting	Traffic and Movement	**North Yorkshire Council Local Impact Report** We understand that North Yorkshire Council are unlikely to be able to submit a Local Impact Report (LIR) relating to Transport and Road issues by the 11 August deadline. We consider the Examiners should contact NYC and ensure that they are able to provide a comprehensive LIR, including a consideration of alternative routes, to support Examiners in their deliberations. This is relevant to all Sites and the Cable Corridor.	The Applicant notes this comment and can confirm that a Local Impact Report has been received from North Yorkshire Council REP1-006.
REP1-017	WR-WHPM-20	West Haddlesey Parish Meeting	Traffic and Movement	**Precautionary Principle** Where the evidence to support acceptable risk mitigation is clearly doubtful, as it is in this case, Examiners should take into account the Precautionary Principle when reaching a decision on routing (and indeed more broadly in their decision-making on the application).	The Applicant notes this comment. The access strategy has been developed using a precautionary approach, seeking to maximise the use of the Strategic Road Network where practicable and adopting worst-case assumptions within the assessment to ensure that potential impacts are not underestimated. An **outline Construction Traffic Management Plan (oCTMP) [updated alongside this submission]** has been prepared to mitigate impacts through a range of measures including temporary traffic management measures, signage, timing restrictions and communication protocols. Whilst a CTMP can effectively manage and mitigate temporary construction traffic effects, it cannot eliminate all impacts from a temporary increase in traffic associated with the Proposed Development. Some residual effects may remain, such as the reported minor adverse effects on driver delay, severance and pedestrian and cyclist amenity. The role of the CTMP is to ensure that such effects are reduced and managed so far as reasonably practicable. The Applicant is therefore confident that, with the mitigation secured through the CTMP, the Proposed Development would not result in an unacceptable impact on highway safety. Requirement 14 in Schedule 2 to the **draft DCO [updated alongside this submission]** provides for the detailed Construction Traffic Management Plan (CTMP) to be approved in consultation with the Local Highway Authority.
REP1-017	WR-WHPM-21	West Haddlesey Parish Meeting	Traffic and Movement	**Overall requested outcome** We respectfully ask that the application as a whole not be recommended given the detrimental impact it will have on sensitive receptors and the overall impact on traffic on our rural roads and villages. Should the proposal go ahead we ask that construction traffic is not routed through West Haddlesey given the substantive reasons presented in this document.	The Applicant notes this feedback but would refer to the findings of the **Transport Assessment [updated alongside this submission]** that concludes 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 (oCTMP) [updated alongside this submission]** and there is not expected to be any long-term significant impacts on the transport network.

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REP1-017	WR-WHPM-22	West Haddlesey Parish Meeting	Traffic and Movement / Cumulative	**Cumulative traffic impacts** There is clearly an overall cumulative impact on the road network across the whole region covered by this proposal. We question whether LVS have properly assessed the cumulative impact to the satisfaction of Examiners in relation to traffic across the whole area given other developments that are in process or have already been approved, and given the deficiencies in the assessments that LVS have submitted.	The Applicant notes this comment. The **Transport Assessment [updated alongside this submission]** considers committed developments and future baseline conditions, ensuring that the potential for cumulative effects is taken into account within the assessment. The assessment identifies that, taking account of these cumulative conditions, the Proposed Development would not result in unacceptable cumulative impacts on the operation or safety of the local highway network.
REP1-017	WR-WHPM-23	West Haddlesey Parish Meeting	Construction and Decommissioning	We remain concerned that residents of West Haddlesey will be impacted by recurrent noise, air quality (dust), vibration, lighting and the increased disturbance in a previously very quiet rural area if the proposed route is used.	Please see the response to WHPM-32 in **The Applicant's Response to Relevant Representations Part 1 [updated alongside this submission].**
REP1-017	WR-WHPM-24	West Haddlesey Parish Meeting	Noise and Vibration	Additionally, we remain concerned about vibration damage to houses that front directly onto the construction routes. Several of the houses and other buildings fronting the road through West Haddlesey date back over 150 years and have minimal or no foundations and are therefore particular at risk of vibration damage.	As set out in **ES Volume 1, Chapter 11: Noise and Vibration [APP-049]**, the construction plant vibration levels have been calculated in accordance with the procedures in BS 5228-2. Paragraph 11.9.26 of the **Chapter 11: Noise and Vibration [APP-049]** concludes that vibration from construction activities is anticipated to result in levels well below the threshold for risk of even cosmetic damage to any properties. Cosmetic damage is defined in BS ISO 4866:2010 *Mechanical vibration and shock – Vibration of fixed structures – Guidelines for the measurement of vibration and evaluation of their effects on structures* as formation of hairline cracks or the growth of existing cracks on drywall surfaces or formation of hairline cracks in mortar joints of block construction. West Haddlesey is located about 1.5km from the closest proposed Solar Development Site and as such vibration impacts from construction plant are negligible. Vibration from construction traffic is also unlikely to be of sufficient magnitude to result in adverse impacts on people and is scoped out of the assessment, as presented in **ES Volume 1, Chapter 11: Noise and Vibration [APP-049]**. This is based on guidance provided in British Standards BS5228-2 and BS7385-2, as well as the Design Manual for Roads and Bridges (DMRB) LA 111. Risk of any damage (even cosmetic damage) to any buildings or other structures, including older houses, starts to occur at levels much higher than those that are perceptible to people. Furthermore, extensive work carried out by the Transport and Road Research Laboratory (TRRL Research Report 246, Traffic Induced Vibration in Buildings by G R Watts) showed that vibration caused by road traffic, even passing very close to historic buildings and on uneven surfaces, did not present a damage risk. As such, no significant effects from vibration are expected.

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					Nevertheless, the **Outline Construction Environmental Management Plan (oCEMP) [updated alongside this submission]** and **Outline Construction Traffic Management Plan (oCTMP) [updated alongside this submission]** include mitigation measures to control and minimise any potential noise and vibration impacts resulting from the construction of the Proposed Development. Where vibration is perceptible for some residents, the oCEMP requires engagement with residents to provide reassurance that properties will not be at risk of damage, particularly where vibration is perceptible.
REP1-017	WR-WHPM-25	West Haddlesey Parish Meeting	Landscape and Visual	**Residential visual effects and buffer distances** We do not accept, the position advanced by LVS, that the flat farmland views from properties affected visually is of low value. We are concerned that again, substantive community and individual concerns are glossed over by the applicant without constructive engagement. We support the proposal for much greater buffer zones from the curtilage of these impacted properties. We do not consider a 30m buffer to be adequate and ask that Examiners consider a much greater distance, such as 250m, be required in these circumstances to allow peaceful enjoyment of property.	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. Views from residential properties are a matter of private amenity. Regarding the offsets from residential properties, the Applicant's rationale for the minimum 30m offset measured from the curtilage has been defined as part of the landscape-led approach to the design of the Proposed Development. This has considered the generally flat topography and effectiveness of planting close to boundaries in mitigating significant effects. This is demonstrated through the LVIA, with the exception of one residential visual receptor associated with VP11 at Siddle Farm House, where moderate adverse significant effects would persist at year 15 of operation. This must be considered in the context of NPS EN-1 paragraph

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					5.10.13, which states that "*all proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites*". 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. The LVIA has concluded that effects on the views of people living in West Haddlesey would be negligible adverse during construction, at year 1 and year 15 of operation, which is not significant.
REP1-017	WR-WHPM-26	West Haddlesey Parish Meeting	Landscape and Visual	[We] remain concerned about the industrialisation of the rural landscape.	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. 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. 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 "*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*." 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.

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REP1-017	WR-WHPM-27	West Haddlesey Parish Meeting	Water Resources and Flood Risk	**Water supply and existing low water pressure** West Haddlesey has continuing issues over several years of low water pressure with some residents not achieving a standard flow rate at their domestic supply. We ask Examiners to ensure that the information provided by Yorkshire Water in relation to water supply to Site 4 will not further impact water pressure in West Haddlesey. We note that the applicant stated that Yorkshire Water had confirmed that supply was adequate for panel washing and there are action points relating to water supply (ISH1-30 and ISH1-31).	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 across the proposed development. The potential connection points within the Order Limits are presented in the revised **Water Resources Assessment [updated alongside this submission]**.
REP1-017	WR-WHPM-28	West Haddlesey Parish Meeting	Agricultural Land and Soils	We maintain our position that the development should not use BMV. Solar infrastructure should be prioritised for brownfield sites and rooftops (industrial/warehouses) to protect national food security.	The National Planning Policy Framework, August 2026, policy S5, principle of development outside settlements sets out that only certain forms of development should be approved outside settlements. The list of the forms of acceptable development includes development for infrastructure including energy. 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. As set out in **ES Volume 1, Chapter 4: Alternatives and Design Iteration [updated alongside this submission]** and in the **Statement of Need [APP-214], t**he Applicant has considered alternatives, including previously developed land and other forms of solar deployment, as part of the site selection and design evolution process. National policy and government guidance, as set out in the **Statement of Need [APP-214]**, recognise that while rooftop and smaller-scale solar installations are an important part of the energy mix, they cannot alone meet the scale of capacity required to achieve clean power and net zero objectives. Large-scale ground-mounted solar therefore remains necessary in addition to, not instead of, rooftop solar. The Applicant has sought to locate the development in areas of lower soil quality. However, it remains that the development will be constructed on some BMV. **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. The same chapter confirms in paragraphs 5.9.25 to 5.9.29 that there are anticipated to be significant benefits to soil health over the lifetime of the Proposed Scheme. As the

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					soils will be left in-situ and undisturbed, the soil and land will be safeguarded for the future. The **Planning Statement [updated alongside this submission]** reports at paragraph 7.6.17 that the 2024 Written Ministerial Statement 'Solar and protecting our Food Security and BMV Land' estimates that, even under the most ambitious scenarios for solar energy, the total area of agricultural land used for solar panels would occupy less than 1% of the UK's agricultural land. In the Land Use Framework for England, published in March 2026, in the context of energy infrastructure and clean power states *"By 2030, renewable energy infrastructure will drive increased energy security; at least 95% of electricity will come from clean power sources, and billpayers across the country will be protected from spikes in energy prices. Solar and wind will remain a small proportion of land use, and much of this land will be managed sustainably to boost and deliver other outcomes, such as grazing animals for food production or rewetting lowland peat soils beneath new solar farms"* (page 11). 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.
Riccall Parish Council					
REP1-012	WR-RPC-01	Riccall Parish Council	The Proposed Development	The Council objects to the Light Valley Solar application in its current form. The scale, location and likely effects of the development raise serious concerns for Riccall and the surrounding area. The Council does not believe that its concerns about construction traffic, road safety, agricultural land, public rights of way and cumulative impact have been sufficiently addressed.	The Applicant notes this comment. The location of the Proposed Development has been informed by available grid connection at Monk Fryston, site availability within reasonable proximity of the grid connection location, avoiding environmentally (including heritage) constrained land. Further information is set out in **ES Volume 1, Chapter 3: Alternatives and Design Iteration [updated alongside this submission].** With regard to scale, whilst the total area within the DCO Order Limits encompasses approximately 1,270 hectares (ha). Of this, the 'Solar Development Sites' comprise approximately 900 ha of land. Around 680 ha of this land is proposed as being required for installation of solar PV panels and associated infrastructure. The remaining 220 ha would provide areas dedicated to ecological mitigation, measurable Biodiversity Net Gain (BNG) delivery, landscaping, offsets and agricultural land managed for environmental enhancement and habitat creation. This is detailed further **within ES Volume 1, Chapter 2: The Proposed Development [updated alongside this submission].**

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					The Proposed Development has been subject to detailed environmental assessment, and embedded design measures and mitigation have been incorporated to avoid or minimise effects on local receptors. This includes an assessment of the impacts of the Proposed Development on Riccall and the surrounding area. The findings of these assessments, as reported in the **Environmental Statement (ES) [APP-038 to APP-190]**, demonstrate that impacts to the road network, road safety, agricultural land, public rights of way and cumulative impact are appropriately mitigated and are not unacceptable.
REP1-012	WR-RPC-02	Riccall Parish Council	Construction and Decommissioning	Noise, lighting, dust and working hours should be carefully controlled. The applicant should provide a named local contact for construction-related problems.	The construction, operation, maintenance and decommissioning of the Proposed Development have been assessed throughout the **ES [APP-038 to APP 190].** As part of the assessment, appropriate mitigation measures are incorporated into the Proposed Development and secured through the DCO and associated management plans. These include controls for working hours, noise, lighting, traffic management, pollution prevention, waste management and community liaison. 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 also act as the primary point of contact should there be any queries or complaints. That plan also incorporates relevant control measures in respect of noise, lighting and dust and sets out the Applicant's commitments in respect of working hours.
REP1-012	WR-RPC-03	Riccall Parish Council	Construction and Decommissioning	The applicant should also provide secured funding for full decommissioning.	The **Funding Statement [APP-021]** submitted with the DCO application demonstrates that the Proposed Development is financially viable and adequately funded to deliver the Proposed Development in full, including decommissioning requirements.
REP1-012	WR-RPC-04	Riccall Parish Council	Alternatives and Design Iteration	The Council is also concerned that such a large development is predominantly proposed on agricultural land rather than previously developed or industrial land. National policy indicates that suitable previously developed, brownfield, contaminated and industrial land should be used where possible. There are a number of former industrial, mining and power-generation sites within the wider area, including sites around Riccall, Wistow, Stillingfleet, Gascoigne Wood, Ferrybridge and Eggborough. The Council is not suggesting that each of these sites would necessarily be suitable for this development, but considers that the applicant should clearly demonstrate what consideration was given to previously developed and former industrial land, why alternative sites were discounted and why the extensive use of agricultural land is considered necessary.	NPS EN-3 paragraph 2.10.21 provides that while land type should not be the predominating factor, applicants should where possible utilise previously developed land and, where use of agricultural land has been shown to be necessary, poorer quality agricultural land should be preferred. NPS EN-1 paragraph 2.10.23 recognises that at this scale, solar developments will use some agricultural land. In line with the above policy, the Applicant has considered previously developed land including brownfield, contaminated and industrial land as set out in **ES Volume 3, Appendix 3.1: Site Selection Assessment Report (SSAR) [AS-019]**. None of the sites identified were suitable to accommodate the Proposed Development. Further, specific brownfield sites raised in consultation have been considered and discounted, as set out in **ES Volume 1, Chapter 3: Alternatives and Design Iteration [updated alongside this submission]** (see Tables 3-1 and 3-2). This includes sites at Riccall, Wistow, Gascoigne Wood, Ferrybridge and Eggborough. The Applicant has also taken a sequential approach to the use of agricultural land, initial focussing its site selection on lower grade

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					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.
REP1-012	WR-RPC-05	Riccall Parish Council	Agricultural Land and Soils	The development is very large and would affect a significant amount of agricultural land across several communities. Riccall Parish Council is concerned about the loss and disturbance of productive agricultural land	The effects of the Proposed Development on agricultural land, including land quality and productivity, are assessed in **ES Volume 1, Chapter 5: Agricultural Land and Soils [updated alongside this submission]**, which states that food security has been considered. The Applicant does not consider that food security will be compromised by the Proposed Development (or solar energy more widely), particularly in the context that the 486 ha of BMV land within the Proposed Development (of which/ approximately 19.1 ha would be required for the permanent elements of the Proposed Development involving soil sealing) would represent approximately 1% of the likely BMV land in Selby District and 0.08% of the likely BMV land in the Yorkshire and Humber Region. It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the NPPF. Further, the Government's UK Solar Roadmap (2024) states that solar development is not considered to compromise food security, and that climate change itself poses the greatest long-term risk to food production - a risk which the Proposed Development directly helps to address by providing a secure, low-carbon source of electricity. It is also noted that of the approximate 900 ha of agricultural land across Solar Development Sites 1 to 4 and 6 to 8, 272.4 ha is under an SFI scheme or is used for the production of energy crops. Almost one-third of the agricultural land within the Solar Development Sites therefore does not produce food, and would not represent a loss to UK food production or have an impact on domestic food security should the Proposed Development proceed. Government-led agricultural initiatives, such as the Sustainable Farming Incentive which is relaunching later in 2026, have prioritised soil health, environmental enhancement and climate resilience, recognising that long-term food security is influenced by a range of factors beyond land take

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					alone, including soil condition, climate change and environmental pressures. The Proposed Development allows soils to remain in situ and undisturbed during operation, supporting soil recovery and long-term land health, with land reinstated and returned to agricultural use as far as practicable following decommissioning. No permanent loss of agricultural land is anticipated.
REP1-012	WR-RPC-06	Riccall Parish Council	Agricultural Land and Soils	Temporary compounds, access tracks and other temporary areas should be removed and the land restored when no longer required. Any consent should contain an enforceable requirement that agricultural land is restored to agricultural use following decommissioning, without future responsibility falling on landowners, local councils or the public.	This is provided for by the DCO. The **Outline DEMP** sets out the requirements for restoration**,** and the provision of a detailed DEMP, in substantial accordance with that outline is secured by the DCO.
REP1-012	WR-RPC-07	Riccall Parish Council	Landscape and Visual	Riccall Parish Council is concerned about the wider effect on the rural character of the area.	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. 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. However, 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 "*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*." 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 Applicant acknowledges that as identified in **ES Volume 1, Chapter 10: Landscape and Visual [APP-048],** visual effects associated with the

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					underground Cable Route Corridor 1-4 arise primarily during the construction phase. These effects are temporary and reversible, reflecting the short-term presence of construction activity.
REP1-012	WR-RPC-08	Riccall Parish Council	Socioeconomics	The cable corridor and associated works could affect public rights of way, permissive paths and access to community facilities. Paths should remain open wherever safe and practical. Where closure is unavoidable, it should be as short as possible with a safe, clearly signed and accessible diversion. Residents and Riccall Parish Council should receive advance notice of closures or route changes. The Council is also concerned about the potential effect on safe access to nearby community facilities, including the recreation ground and children's playground.	The Applicant notes the concerns raised. The **outline Public Rights of Way Management Plan (oPRoWMP) [APP-199]** provides a framework for the management of walking, cycling, horse riding and other public access routes throughout the Proposed Development. Its key objective is to ensure that Public Rights of Way (PRoW) remain open and safe at all times throughout the construction, operational and decommissioning phases, with the same applying to permissive paths during the operational phase. For the Cable Route Corridor specifically, the PRoWs which will be crossed and require management during construction are set out in Table 3-2 of the **oPRoWMP [APP-199]**. No PRoWs along the Cable Route Corridor are proposed to be permanently stopped up or diverted. Public access to PRoWs along the Cable Route Corridor will therefore be retained so far as is practicable, with any disruption expected to be short-term, localised and limited to the period during which works are taking place in the immediate vicinity. The Applicant is committed to minimising disruption across the PRoW network wherever practicable and will adhere to the hierarchy of actions set out in Section 2.6.8 within the **oPRoWMP [APP-199]**. Any short-term or temporary closures will be brief and related to specific works. Where PRoWs remain open alongside or across construction activity, a range of management measures will be applied to ensure user safety, including: wider access tracks or temporary fencing to segregate PRoW users from vehicles; appropriate signage advising of construction activity, working hours and Site Manager contact details; the provision of banksmen to hold vehicles where a PRoW user is present; a 10 mph limit on the approach to and across PRoW crossings; a requirement for drivers to stop at all PRoW crossings; and keeping PRoWs clear of construction vehicles and apparatus outside permitted construction hours so far as is practicable. Measures to manage the interaction between construction traffic and other users of the network are also set out in the **outline Construction Traffic Management Plan (oCTMP) [updated alongside this submission]**, including public awareness raising of the timing of activities and information on traffic routing. Signage will be placed at all PRoW intersections with the Proposed Development to inform the public of planned works, closures and alternative routes, with the location and content of signs agreed with Local Authority PRoW officers. The detailed PRoW Management Plan, to be prepared by the Principal Contractor in substantial accordance with the

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					oPRoWMP and secured through a Requirement of the **draft Development Consent Order [updated alongside this submission]**, will include a schedule of closures and diversions, and relevant parties will be notified at least seven days in advance of any closure. In addition, the **outline Construction Environmental Management Plan (oCEMP) [updated alongside this submission]** requires the Contractor to develop and implement a Stakeholder Communications Plan, including community engagement and a complaints procedure, with a site display board, project website and Site Manager contact details. A Community Liaison Officer would also be appointed to lead discussions with the local community during construction and keep communities informed of upcoming works and PRoW changes. In relation to community facilities, community and recreational receptors within 1 km of the Solar Development Sites and 100 m of the Cable Route Corridor and Highway Improvement Areas have been identified and assessed in **ES Volume 1 Chapter 13: Socioeconomics [updated alongside this submission]** and **Appendix 13.1: Socioeconomic Receptors Impact Assessment [APP-177]**. The assessment assumes access to these receptors would be maintained at all times, and concludes that effects on recreation grounds, playing fields and similar community facilities are, at worst, minor adverse and not significant, reflecting the temporary and localised nature of construction works. With regard to the playground, construction access routes have been designed such that construction traffic does not pass directly adjacent to the playground. As such, no direct interaction between construction traffic and users of the playground is anticipated. The park is also located more than 1 km from any Solar Development Sites and is only expected to experience indirect impacts caused by highway improvement works. This is detailed within **ES Volume 2, Figure 14.4 Construction Routing [APP-113]** and **ES Volume 1 Chapter 13: Socioeconomics [updated alongside this submission]**.
REP1-012	WR-RPC-09	Riccall Parish Council	Community benefits	Riccall Parish Council is willing to discuss an appropriate community benefit package if the development is approved. However, community benefits must remain separate from the decision on whether consent should be granted. They should not be treated as compensation for an unsafe access route or used to justify avoidable harm. Any package should be fairly shared between the communities most affected and give them a meaningful role in deciding how funds are used.	It is agreed that any community benefit package is a separate consideration from the planning decision for the Proposed Development. The Applicant will continue discussions on this with North Yorkshire Council.

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REP1-012	WR-RPC-10	Riccall Parish Council	Traffic and Movement	**King Rudding Lane and A19 junction suitability** Riccall Parish Council remains particularly concerned about the proposed cable-route construction compound and access points on King Rudding Lane. King Rudding Lane is a narrow single-track rural road used by residents, agricultural vehicles, walkers and people using nearby public rights of way. It also provides access towards Skipwith Common and its visitor parking. There are limited opportunities for vehicles to pass safely. The junction with the A19 is also a serious concern. The Council does not believe this route is suitable for a substantial increase in heavy goods vehicles without stronger evidence, detailed safety measures and effective monitoring.	The Applicant notes these comments. Section 3.7 of **ES Volume 1, Chapter 3: Alternatives and Design Iteration [updated alongside this submission]** describes the process undertaken to identify suitable locations for the Cable Route Corridor construction compounds. The **Transport Assessment [updated alongside this submission]** (TA) considers the transport impacts associated with all elements of the Proposed Development during construction, including the temporary construction compounds. Baseline traffic data presented in Table 2-1 of the TA demonstrates that King Rudding Lane currently accommodates HGV traffic, with approximately 7% of existing traffic comprising HGV movements. Construction of the Proposed Development is forecast to result in a temporary increase in HGV movements on King Rudding Lane, from approximately 28 to 56 HGV movements per day. Whilst this represents a short-term increase in HGV activity, the effects have been assessed within the TA and are considered temporary and limited in scale. Section 7 of the TA concludes that any impacts associated with the Proposed Development, including those arising from the use of the King Rudding Lane compound, can be appropriately managed through the mitigation measures set out in the **outline Construction Traffic Management Plan (oCTMP) [updated alongside this submission].** In addition, provision has been made within the Order Limits for a number of Highway Improvement Areas where passing places may be required. The final location and design of any such passing places will be determined by the appointed contractor and agreed with the Local Highway Authority through the detailed CTMP approval process. These Highway Improvement Areas, including on King Rudding Lane, are shown on **ES Volume 2, Figure 1.2: Elements of the Proposed Development [APP-058]**. As part of the route selection process, engagement was undertaken with North Yorkshire Council during the early stages of development to identify any routes considered unsuitable for construction traffic. North Yorkshire Council advised that vehicles accessing the Cable Route Corridor at Riccall should approach the A19 junction from the south, using the roundabout located south of the access point to facilitate a left-turn entry and avoid construction traffic having to cross the A19. This routing strategy has been incorporated into **ES Volume 2, Figure 14.4: Construction Routing [APP-113]**.

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REP1-012	WR-RPC-11	Riccall Parish Council	Traffic and Movement	**Forecast traffic increases on King Rudding Lane** The Transport Assessment forecasts that activity associated with the King Rudding Lane compound and access could add 58 daily vehicle movements. Total daily traffic would increase from 393 to 451 movements, approximately 15 per cent. HGV movements are forecast to increase from 28 to 56 per day, approximately 101 per cent. The Council is particularly concerned that heavy vehicle movements could more than double on a narrow rural road.	The Applicant notes this comment. The use of King Rudding Lane is associated with construction of the Cable Route Corridor only and therefore the impacts will be short term associated with the construction of the northern section of the Cable Route Corridor only. Any temporary increases in traffic flows associated with the Cable Route Corridor construction will be managed through the mitigation measures set out in the **outline Construction Traffic Management Plan (oCTMP) [updated alongside this submission].** This includes the provision of passing places, where necessary, and the use of banksmen to facilitate the safe movement of construction vehicles and other road users along sections of the route.
REP1-012	WR-RPC-12	Riccall Parish Council	Traffic and Movement	**Construction traffic information and duration** The applicant should confirm peak movements, vehicle sizes, working and delivery hours, how long the compound and accesses would be used and whether employee and contractor vehicles are included. The overall construction period could last 24–36 months, and even shorter use of individual compounds could significantly affect residents and road users.	The Applicant notes this comment. The use of King Rudding Lane is associated with construction of the Cable Route Corridor 1-4 only and therefore the impacts will be related to the length of cable required to be put in place for the construction of the northern section of the Cable Route Corridor only that will be supported by the compound at this location. Given the nature of the works, table 5-6 in the **Transport Assessment [updated alongside this submission]** forecasts that a Cable Construction Compound could generate 7 HGV movements and 10 LGV/car movements per day when in use. The working hours are set out in the **outline Construction Traffic Management Plan (oCTMP) [updated alongside this submission]** and are Monday to Friday from 07:00 – 18:00. Saturday from 08:00 – 13:30.
REP1-012	WR-RPC-13	Riccall Parish Council	Traffic and Movement	**Alternative access arrangements for King Rudding Lane** The applicant should properly investigate alternative access arrangements, including possible access through the former mine site or the industrial estate on Market Weighton Road. The King Rudding Lane compound and accesses should be removed unless no safer and more suitable alternative is reasonably available.	The Applicant notes this comment and can confirm that the construction access strategy was developed following consideration of a range of operational, environmental and highway factors. This included considering other viable routes and the industrial estate on Market Weighton Road was deemed not to be suitable due to its separation distance from the Proposed Development leading to increased vehicle movements on the local network. Please see the response to RCPC-04 in **The Applicant's Response to Relevant Representations Part 1 [updated alongside this submission]** for further details.

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REP1-012	WR-RPC-14	Riccall Parish Council	Traffic and Movement	**A19, Main Street and Checker Lane** The Council remains concerned about construction traffic entering, leaving or crossing the A19 around Riccall, particularly given existing road-safety concerns on this section of the A19. This includes vehicles turning at the King Rudding Lane junction, unsuitable or unauthorised turning movements and the potential use of Main Street and Checker Lane by construction traffic. There are also concerns about the proposed underground cable crossing of the A19. The Examining Authority should consider road width, visibility, pedestrian use and whether large vehicles can pass safely at the proposed access locations.	The Applicant notes this comment and confirms that the construction access strategy requires vehicles to approach the A19 junction at Riccall from the south, utilising the roundabout located south of the junction, to facilitate a left-turn entry from the A19. This approach avoids the need for construction traffic to undertake right-turn movements across the A19 and has been incorporated into **ES Volume 2, Figure 14.4: Construction Routing [APP-113].** The cable crossing of the A19 would be undertaken using trenchless techniques, such as Horizontal Directional Drilling (HDD). This approach avoids the need for open trenching of the carriageway and therefore would not require road closures or significant disruption to traffic on the A19. Therefore, the temporary increase in traffic during the construction phase is not expected to significantly alter the conditions on the network.
REP1-012	WR-RPC-15	Riccall Parish Council	Traffic and Movement	**Construction Traffic Management Plan** Before construction begins, a detailed Construction Traffic Management Plan should be approved following consultation with Riccall Parish Council and the highway authority. It should set out approved routes, delivery times, vehicle restrictions, warning signs, temporary speed restrictions where appropriate, wheel-washing, road-cleaning and the use of banksmen where required. Construction vehicles should not wait, park, turn or make U-turns in unsuitable locations. Vehicle movements should be monitored and there should be a clear process for reporting breaches.	The Applicant notes this comment and can confirm that the **outline Construction Traffic Management Plan (oCTMP) [updated alongside this submission]** will be developed further through a detailed Construction Traffic Management Plan (CTMP) as secured through the DCO. The updated CTMP will be approved by the relevant planning authority in consultation with the relevant Highway Authority prior to the commencement of construction. 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. It also outlines procedures for monitoring and compliance.
REP1-012	WR-RPC-16	Riccall Parish Council	Traffic and Movement	**Road condition, damage and financial security** Pre-construction condition surveys should be completed on affected roads, with the applicant responsible for damage caused by the development. An appropriate financial bond or other guarantee should be secured to ensure that repair funds are available.	The Applicant notes this comment and the **outline Construction Traffic Management Plan (oCTMP [updated alongside this submission]**) 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 North Yorkshire Council 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 North Yorkshire Council. Private access tracks used for construction access will be maintained and returned to a condition no worse than before.

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REP1-012	WR-RPC-17	Riccall Parish Council	Traffic and Movement	**Construction material on roads, paths and public areas** Mud, dust and construction materials should not be allowed to build up on roads, paths or public areas. Affected routes and surrounding land should be properly reinstated.	The Applicant notes this comment and can confirm that the **outline Construction Traffic Management Plan (oCTMP) [updated alongside this submission]** includes measures including wheel washing requirements. The oCTMP also commits to a Road Condition Survey which will ensure that if any issues are identified, that can be attributed to the construction activities for the Proposed Development, they will be resolved by the Principal Contractor to the satisfaction of North Yorkshire Council.
REP1-012	WR-RPC-18	Riccall Parish Council	Water Resources and Flood Risk / Agricultural Land and Soils	Clear and enforceable arrangements should cover soil protection, drainage, flood-risk management and restoration.	Soil protection measures are set out in the **Outline Soil Resources Management (SRMP) [updated alongside this submission]** and will apply throughout the lifetime of the Proposed Development. Such measures include but are not limited to avoidance of unnecessary trafficking over land, ensuring soil is in a suitable moisture state to be handled prior to excavation, minimising and/or ameliorating any soil compaction, and following best practice measures for stockpiling displaced soils. The principles of the Outline SRMP will be further developed in the detailed SRMP which is secured by Requirement 17 of Schedule 2 of the **Draft DCO** [**updated alongside this submission**]. Flood risk and drainage measures are set out in the **Flood Risk Assessment (FRA) [updated alongside this submission]**, **Outline Drainage Strategy (ODS) [updated alongside this submission]**, and the environmental management plan suite. Measures identified within these documents will apply through the lifetime of the Proposed Development to ensure no increase in flood risk and the safe management of surface water.
REP1-012	WR-RPC-19	Riccall Parish Council	Arboriculture	There are also concerns about the proposed underground cable crossing of the A19 and **possible damage or cutting back of trees and hedges along Checker Lane**.	The underground cable crossing under the A19 will be installed using trenchless techniques such as horizontal direct drilling (HDD). The launch and receptor pits will be located outside of the canopy spreads and roots protection areas of retained trees and the buffer zones of woodland, ancient woodland and ancient and veteran trees, as set out in the **Arboricultural Impact Assessment** (**ES Volume 3 Appendix 16.2 [APP-184]).** No trees or hedges along Checker Lane will be removed to facilitate construction access. Two trees and one tree group, all early mature, to the west of Checker Lane and edge trees within the woodland to the east of the Lane will undergo minor crown raising (removal of low branches) over the road to achieve an aboveground clearance of 5 m, which is standard highways clearance to accommodate high-sided vehicles. This minor pruning will be carried out in accordance with the appropriate British Standard (BS3998:2010) by qualified arborists to ensure that trees and woodland will not suffer deterioration as a result of the works.
REP1-012	WR-RPC-20	Riccall Parish Council	Cumulative and In-Combination Effects	It is also concerned about the potential cumulative traffic impact with the existing wood-processing operation on King Rudding Lane, currently subject to a separate retrospective planning application.	As an existing use, for which planning permission is being sought retrospectively, traffic associated with the wood processing facility is included within the baseline traffic flows used in the assessment. The **Transport Assessment [updated alongside this submission]** also includes a future baseline scenario, with traffic flows forecast to 2029 (the

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					assumed peak year of construction activity) using TEMPro growth factors derived from the National Trip End Model. This approach accounts for anticipated background traffic growth, including the effects of other developments, and ensures that future network conditions have been considered within the assessment.
REP1-012	WR-RPC-21	Riccall Parish Council	Cumulative and In-Combination Effects	Light Valley Solar should not be considered in isolation. Riccall and the surrounding area are affected by, or being asked to consider, other major developments and planning proposals. These could place additional pressure on the same roads, landscape and communities. The Council is also concerned about the cumulative loss of agricultural land from solar, energy and other developments. Agricultural land in the wider area supports food and crop production, including crops used by other local developments and businesses. The combined effect on the availability of productive land, associated traffic movements and the rural landscape should therefore be properly considered. The cumulative effect should be properly assessed, particularly in relation to construction traffic, the A19, King Rudding Lane, public rights of way and agricultural land.	The Applicant has assessed the cumulative impacts of other schemes on the topics referred to by the Parish Council. Further information is contained in **Chapter 17: Cumulative and In-Combination Effects [updated alongside this submission]** of the Environmental Statement.
Thorganby Parish Council					
REP1-015	WR-THPC-01	Thorganby Parish Council	The Proposed Development	Thorganby Parish Council has listened to the concerns raised by multiple residents and has recognised the apparent majority sentiment against the proposed development. On the face of it as things stand, based on the recent hearings at Escrick, this is a scheme which takes without giving, or at least giving the absolute bare minimum that the developers can get away with, and as such we cannot endorse and will continue to oppose it.	The Applicant notes this comment but considers that it has developed a scheme which provides national and local benefits.
REP1-015	WR-THPC-02	Thorganby Parish Council	The Proposed Development	One final note to make is to give consideration to Government announcements in recent days in respect of the roll-back of net-zero targets across various areas, and how changing Government policy over coming months and years might change the mindset of the Inspectorate in terms of the decisions it takes – we are looking to the Inspectorate to ensure fairness over decades, not just in the 'here and now'.	The designated National Policy Statements (NPS) for Energy Infrastructure, specifically the Overarching NPS for Energy (EN-1), Renewable Energy Infrastructure (EN-3) and Electricity Network Infrastructure (EN-5) all dated December 2025, and which came into force in January 2026, apply to this examination and to decision-making relating to this application. The Planning Act 2008 makes it clear that, in making a decision, the relevant Secretary of State (SoS) *"must decide the application in accordance with any relevant NPS"* (s104(3)), subject to certain provisos.

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					The SoS is entitled to disregard any representations that relate to the merits of the designated NPS, meaning that the ExA is not required to spend time examining representations, such as this representation, that challenge policy set out in NPSs, or the validity of NPSs themselves. The **Statement of Need [APP-214]** sets out the contribution the Proposed Development will make to supporting the government's aim to ensure the supply of energy to the national energy system always remains secure, reliable, affordable, and consistent with meeting legally binding greenhouse gas emissions on the way to net zero by 2050.
REP1-015	WR-THPC-03	Thorganby Parish Council	The Proposed Development	Retail energy markets are largely governed by wholesale gas prices, which is mainly imported, and therefore we feel that this proposed scheme would deliver zero benefit in terms of cost savings to the residents whose locale is being so dramatically altered. The energy produced under such a scheme would be fed into the National Grid and retailed according to market forces, and therefore this area simply becomes a 'factory floor' for energy production and transitions from being a rural economy to an industrial economy – with no mandate for such change from those most affected.	The **Statement of Need [APP-214]** sets out the contribution the Proposed Development will make to supporting the government's aim to ensure the supply of energy to the national energy system always remains secure, reliable, affordable, and consistent with meeting legally binding GHG emissions on the way to net zero by 2050. Section 3.8 of the **Statement of Need** explains that it is the government's view that *"In an era of heightened geopolitical risk, switching fossil fuelled generation for homegrown clean energy from renewables and other clean technologies offers us security that fossil fuels simply cannot provide".* Section 3.9 of the **Statement of Need** summarises the government's UK Solar Roadmap, which states at page 3 that *"Solar is at the heart of* [the government's] *mission to make the United Kingdom a clean energy superpower. It is one of the cheapest and quickest to build power sources we have … Solar offers huge potential to boost our energy independence, bring down bills and tackle the climate crisis"* (Ref 30, p3)." Chapter 10 of the **Statement of Need** describes commercial factors relating to UK power prices and how increasing the capacity of renewable assets in GB, including through large-scale ground mount solar projects, reduces the traded price of UK power and the UK's dependency on volatile international energy markets. Both of these factors apply downward pressure on bills for both local and national consumers of electricity.
REP1-015	WR-THPC-04	Thorganby Parish Council	The Proposed Development	This scheme, to the best of our knowledge, is backed by an international asset management company based in Australia. The profits derived from running this scheme are intended to flow to the shareholders of this organisation. The organisation behind the scheme will have one simple motivation - to extract the maximum amount of revenue throughout the course of the scheme in order to satisfy shareholder demand. The rights and negative consequences to the residents affected, and indeed the wider UK, simply will not feature in the operational planning of such a proposal.	The Applicant notes the concerns about the reasons behind the Proposed Development. The Applicant's **Statement of Need [APP-214]** provides evidence that the Proposed Development aims to help meet national targets for clean energy and net zero targets set out in legislation and policy. The aim is to deliver long term environmental benefit alongside a secure energy supply. As set out in the **ES Volume 3, Appendix 3.1: Site Selection Assessment Report (SSAR) [AS-019],** the Proposed Development has been brought forward in the context of a set of Project Objectives that take into account a range of factors alongside seeking to meet the Net Zero challenge. 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

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				This is about making money – potentially to the huge detriment of the residents and regions affected by it for generations.	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 Applicant confirms that the owners of Island Green Power, Macquarie, has a strong record of long-term UK investment. Since 1999, Macquarie has invested more than £65 billion into UK infrastructure, including energy projects, supporting more than 33,000 UK jobs.
REP1-015	WR-THPC-05	Thorganby Parish Council	Alternatives and Design Iteration	We have seen no explanation as to why the many brownfield sites left in the wake of industrial shrinkage over the past 50 years are not being considered.	NPS EN-3 paragraph 2.10.21 provides that while land type should not be the predominating factor, applicants should where possible utilise previously developed land and, where use of agricultural land has been shown to be necessary, poorer quality agricultural land should be preferred. NPS EN-1 paragraph 2.10.23 recognises that at this scale, solar developments will use some agricultural land. In line with the above policy, the Applicant has considered previously developed land including brownfield, contaminated and industrial land as set out in **ES Volume 3, Appendix 3.1: Site Selection Assessment Report (SSAR) [AS-019]**. None of the sites identified were suitable to accommodate the Proposed Development. Further, specific brownfield sites raised in consultation have been considered and discounted, as set out in **ES Volume 1, Chapter 3: Alternatives and Design Iteration [updated alongside this submission]** (see Tables 3-1 and 3-2). This includes sites at Riccall, Wistow, Gascoigne Wood, Ferrybridge and Eggborough.
REP1-015	WR-THPC-06	Thorganby Parish Council	Agricultural Land and Soils	In addition, as a result of the geographical location of this area near to a North-South/East-West crossroads of the A1/M1 and M62, there have been many massive scale warehousing and distribution centre developments with huge buildings with roofs suitable for solar power placements. Is it simply that going onto agricultural and greenfield sites is cheaper and faster than the more complex exploitation of industrial and brownfield sites? This almost seemed to be conceded by the developers, and we don't feel that 'this is the cheapest option' is good enough justification for granting approval of the scheme.	As per the Applicant's response to Thorganby Parish Council in **The Applicants Response to Relevant Reps - Part 1 [PDB-005],** national policy recognises that, while rooftop solar has an important role to play, large-scale ground-mounted solar developments are still required to deliver the scale of renewable energy generation needed to meet clean power and net zero targets.

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REP1-015	WR-THPC-07	Thorganby Parish Council	Agricultural Land and Soils	Most of the land which would be affected around the Escrick site (LVS Site 1) is classified as BMV/ALC Grade 2 (the second highest land rating in the UK), and is used for arable production rather than grazing pasture. The removal of this land from productive farming would have a negative impact on UK domestic food production and therefore UK food security. With nearly 500 hectares of BMV land taken out of production across the entire scheme, using wheat as an example crop, with wheat yields averaging around 10 tonnes per hectare, this equates to around 300,000 tonnes of wheat not being produced domestically over a 60-year span, and having to be imported. We are not familiar with the status of other affected areas, but feel that parishes across the development will and should highlight the BMV/ALC values for their areas so that the wider impact on food production and the amplified effect on additional imports is made clear. Every thousand tonnes of wheat, potatoes or carrots (widely grown in this area) not produced in the UK must be imported, as we are not a net exporter of any of these foodstuffs. On a wider front, the Inspectorate should take the provision of national food security into account.	As confirmed in **ES Volume 1 Chapter 5 – Agricultural Land and Soils [updated alongside this submission]**, only 9% of the land in Solar Development Site 1 is classified as Grade 2. In response to submissions made by this and other Interested Parties, and whilst the Applicant notes that food security is not a matter considered in planning policy terms, it has produced a 'Farming Report' which considers how the fields within the Proposed Development are used (noting that this is a point in time, and absence of the Proposed Development could change over time, including being taken out of agricultural use). This is appended at Appendix A to this submission. The Report considers the loss of crop production in the context of national yields and confirms that most crop types within the Solar Development Sites contribute less than 0.1% to overall production. Given this, and what is reported in Chapter 5 at a regional level, there is not considered to be any significant impact on domestic food security arising from the use of the land in the Solar Development Sites for energy production instead of food production.
REP1-015	WR-THPC-08	Thorganby Parish Council	Climate Change Resilience	With a warming climate leading to greater drought and reduced crop yields, plus the loss of crops to wildfires and deliberate arson as being witnessed across the UK at this very moment, projects such as this which further reduce our national capability to feed our growing population must be called into serious question.	The Applicant notes concerns raised around the impact on food production and increasing drought conditions as a result of climate change. **ES Volume 1, Chapter 7: Climate Change Resilience [APP-045]** assesses the resilience of the Proposed Development to projected changes in climate, with the detailed assessment included in **ES Volume 3, Appendix 7.1: Climate Change Resilience Assessment [APP-158]**. 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.
REP1-015	WR-THPC-09	Thorganby Parish Council	Greenhouse Gas Emissions Agricultural Land and Soils	We have seen no calculations from the developers in terms of how much food production tonnage would be reduced across all of the areas lost to crop cultivation over the length of the projects and how the increased importation transportation generated CO2 values would be set off against the claimed CO reductions supposedly coming from the move to non-fossil fuel generation.	The Applicant notes concerns raised around the impact on food production and the GHG emissions associated with importing food as a result of 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]**.

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				Given that most imported wheat into the UK comes from Canada, this could potentially be a figure running into tens of thousands of tonnes of CO2 relating purely to sea transportation, plus land haulage on both sides of the Atlantic – surely not a factor to be left out of the consideration of the scheme's pros and cons?	The lifecycle assessment includes GHG emissions associated with products to be used on site (i.e. the manufacture of components such as solar panels, cables, the BESS and other key infrastructure components), as well as construction, operation and decommissioning activities. The results of the GHG emissions assessments, provided in carbon dioxide equivalent (CO_2e), are included within Chapter 9 and further details provided within **ES Volume 3, Appendix 9.1: Greenhouse Gas Emissions Assessment [APP-166].** As per best practice and the industry guidance followed for the GHG emissions assessment, the emissions associated with food production have not been calculated within this assessment. **Appendix A** to this submission sets out the Applicant's understanding of the impacts to crops that are currently grown at the Solar Development Sites (noting that it cannot be assumed that this growing pattern would continue for the lifetime of the Proposed Development if it were not there). This report demonstrates that the Proposed Development impacts on a miniscule amount of the UK's wheat supply. It would be speculation and conjecture to suggest if such a small amount of the supply would need to be replaced, and if so, how this would be done – it cannot be assumed that it would come from Canada. As such, it would not be appropriate (in the context of the requirements of the EIA Regulations and the Finch decision) to seek to assess related GHG emissions from such replacement, which would in any event, be de minimis in the context of the overall calculations already carried out by the Applicant in the ES.
REP1-015	WR-THPC-10	Thorganby Parish Council	Socioeconomics	Parishioners have expressed serious concerns over how many tenant farming families are either going to be made jobless/homeless, or have the acreage they farm reduced below sustainable business levels. Add to this the reduction in work for the many independent and small-scale farming contractors based throughout the region and we foresee a great deal of economic hardship resulting from the significant loss of arable lands under this proposed scheme. These are not careers or skills that are easily transferrable into other areas, so we do not consider that any 'employment opportunities' associated with the development would be sufficient to remedy the likely hardships which would be brought about by the scheme.	**ES Volume 3, Appendix 1.1: EIA Scoping Report [APP-143]** proposed to scope out effects on agricultural holdings and farm businesses because all landowners with farm businesses who are involved in the solar and battery elements of the Proposed Development have agreed to be involved in the project on a voluntary basis and have, therefore, considered the potential effects on the overall viability, diversity and resilience of their farm businesses. Agreements will also be in place between the landowners and occupiers of the land should the Proposed Development proceed. The Applicant has provided evidence to PINS that voluntary agreements are in place and that all existing tenancies in these sites are based on short-term licences only, with no long-term tenancy agreements or succession rights affected by the Proposed Development. The Proposed Development would provide a long-term, alternative income source that would remove reliance on direct public support from agri-environment schemes whilst still providing environmental benefits. It would offer a stable diversification option for agricultural businesses and provide financial security against volatility in wholesale food commodity markets and yields, protecting the remaining farm operations.

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					ES Volume 1, Chapter 13: Socioeconomics [updated alongside this submission] notes that no job losses are anticipated across the majority of farms within the Order Limits. One farm which has signed an Option Agreement with the Applicant has identified the potential for a single job loss.
REP1-015	WR-THPC-11	Thorganby Parish Council	Socioeconomics	There is going to be a loss of amenity in terms of footpaths, bridleways and other rights of way currently enjoyed over varying types of countryside being subsumed into an industrial landscape offering no enjoyable recreational facilities in comparison with that available to residents and visitors at present. The suggestions made by the developers about footpath creation and recreation areas being provided alongside their developments are fairly ludicrous – who comes into the countryside to picnic, walk, cycle, birdwatch, dog-walk etc alongside and within an industrialised landscape?	The Applicant acknowledges concerns that the character of the landscape experienced by users of Public Rights of Way (PRoW), bridleways and other recreational routes may change as a result of the Proposed Development. The Proposed Development has been designed to maintain public access throughout the operational phase, with existing PRoW retained wherever practicable and supplemented by new permissive paths to improve connectivity and create additional route options. The **outline Public Rights of Way Management Plan (oPRoWMP) [APP-199**] sets out the approach to maintaining access and managing any temporary disruption during construction. To maintain the amenity of routes, the Applicant has incorporated embedded mitigation including landscaping and a minimum 15 metre offset between PRoWs and infrastructure, including fencing. For routes where solar infrastructure is present on both sides, this provides a minimum corridor width of 30 metres. In many locations, new permissive paths are located along the edge of Solar Development Sites, meaning infrastructure would only be present on one side of the route. These measures are set out in **ES Volume 1, Chapter 13: Socioeconomics [updated alongside this submission]** and the **oPRoWMP [APP-199].** The Applicant's assessment of recreational receptors and PRoWs concludes that, with embedded mitigation in place, no significant effects on PRoW receptors are anticipated. While individual users may have different preferences regarding landscape character and recreational experiences, the assessment indicates that access to the countryside will be maintained and enhanced through the provision of additional permissive paths and connectivity improvements.

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REP1-015	WR-THPC-12	Thorganby Parish Council	Socioeconomics	There is no way of disguising the fact that this is going to make the area less appealing and therefore the properties owned and invested in by many families are likely to be both harder to sell and will achieve lower sale prices than if the development was not prevalent in the area. Why is no scheme in existence to fairly compensate affected families and does the Inspectorate consider that it is just and reasonable to inflict massive financial distress on families and property owners? If construction land can be compulsory purchased, then people whose properties are potentially rendered unsaleable or massively devalued should be fully compensated for the lost value of their property – to at least permit them to move away from the developments. We have heard at the hearings about properties which would be surrounded, and the developer appeared to give zero thought or sympathy to the families who would affected – so we urge the Inspectorate to step in where necessary to prevent or fully mitigate the worst of these injustices.	The Applicant has submitted the **Book of Reference [updated alongside this submission].** This includes persons who may be eligible to claim compensation if the Development Consent Order is granted and the Proposed Development developed. Under Part 1 of the Land Compensation Act 1973, property owners (Category 3) are eligible to claim compensation for any physical impacts from the operation of the Proposed Development, such as noise and vibration. However, compensation is not available for loss of value due to visual impacts or diminished views - this is consistent with established planning law. The Applicant will comply with statutory process for any compensation claims submitted and will review and assess each claim in accordance with the relevant legislation under which it is made. The Applicant would also refute the suggestion that it has not given any thought to neighbours of the Proposed Development. It has specifically designed the Proposed Development and its associated mitigation to account for these impacts, as is ultimately reflected in the conclusions of its assessments.

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REP1-015	WR-THPC-13	Thorganby Parish Council	Community Benefits	We have seen no evidence of serious proposals, should the scheme be approved, about how community benefit in terms of investment funds would be allocated and guaranteed over the life of the scheme. The developers are quite prepared to take away what to many people is 'a green and pleasant land' for generations – so what are they going to give them in return in order to enhance local facilities and amenities? Thorganby is a village with pretty much no facilities apart from a village hall and a playing field. We have lost our community pub, have no shops and a limited bus service which inhibits choice for residents young and old, but particularly young people not able to drive yet but wanting to explore the wider world, and avail themselves of part-time work in York. Community grants should be a feature of the developer's proposals, but thus far we have only seen limited platitudes and no hard and fast costed and guaranteed community investment proposals. Again, we urge the Inspectorate to hold the developers to account and ensure that investments are both agreed with communities as being realistic but are also guaranteed and that there can be no backsliding on promises once the scheme is underway, should it be approved. Our very real concern is that the developers will construct and move on, leaving industrialisation in their wake and becoming 'removed' from the day-to-day operations.	Any community benefit package that is agreed by the Applicant with North Yorkshire Council is not something that can be taken into account in the planning balance, but the Applicant is committed to agreeing one with the Council. The mitigation and enhancement commitments that have been made by the Applicant are secured via the DCO.
REP1-015	WR-THPC-14	Thorganby Parish Council	Biodiversity	North Yorkshire is predominantly a rural county, and as such is recognised as having a large number of often sensitive and internationally recognised wildlife sanctuaries. Within this immediate area we have both the Lower Derwent Valley National Nature Reserve, a SSSI/Ramsar site of internationally recognised importance for migrating wildfowl, and the Skipwith Common National Nature Reserve.	Potential impacts of the Proposed Development on ecology and biodiversity are assessed in **ES Volume 1, Chapter 6: Biodiversity updated alongside this submission]**. An assessment of the potential impacts on the qualifying features of the Skipwith Common SAC and SSSI as a result of the Proposed Development is included in the **ES chapter and the Shadow Habitats Regulations Assessment (sHRA) Report [APP-223]**. The sHRA finds no pathway for adverse effects to be caused to Skipwith Common SAC, and **ES Volume 1, Chapter 6: Biodiversity updated alongside this submission]** confirms that negligible effects on Skipwith Common SAC and SSSI are anticipated during all phases of the development, which are not significant. The Lower Derwent Valley SAC is designated for Annex I habitats: Lowland hay meadows (Alopecurus pratensis, Sanguisorba officinalis) and

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					Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) as well as Annex II species otter. As further discussed in the **Shadow Habitats Regulations Assessment (sHRA) Report [APP-223]**, the Proposed Development is not functionally linked to the Lower Derwent Vally SAC (however is functionally linked to SPA). The Applicant notes the presence of Functionally Linked Land to the SPA in both **ES Volume 1, Chapter 12: Ornithology [as updated alongside this submission]** and **Shadow Habitat Regulations Assessment (sHRA) [APP-223]**. The Functionally Linked Land associated with bird species has been fully and appropriately assessed within the sHRA, as indirect impacts to the SPA and Ramsar site were identified to FLL and the species associated with the site **[APP-223]**. Natural England is satisfied with the approach, assessment and conclusion that there will be no adverse effects of the integrity of the Lower Derwent Valley SPA and Ramsar site, as detailed in their Relevant Representation within **The Applicant's Response to Relevant Representations Part 1 [PDA-014]**. The Bird Mitigation Area has been designed to offset all impacts on waterbird species, both during breeding and non breeding periods. It is also expected that species not currently recorded within the Order Limits will benefit from the habitat enhancements, as well as from improved habitat connectivity to the Lower Derwent Valley and wider network.
REP1-015	WR-THPC-15	Thorganby Parish Council	Biodiversity	Loss of habitat for mammals, birds and insect life is going to devalue the flora and fauna of the area in a manner which is unlikely ever to be improved in a dramatically changed landscape, regardless of ancillary planting schemes which are unlikely to mature for decades. Given the proposed 60-year lifespan of this development, we foresee a desertification effect of the ground under the solar arrays and those areas affected by associated infrastructure and cabling routes.	Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 6: Biodiversity [updated alongside this submission]** and **ES Volume 1, Chapter 12: Ornithology [as 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 (BNG). Potential impacts of the Proposed Development on ecology and biodiversity are assessed in **ES Volume 1, Chapter 6: Biodiversity [updated alongside this submission]** and **Chapter 12: Ornithology [APP 050]**, which considers baseline conditions and evaluates likely effects during construction, operation and decommissioning. The assessment identifies embedded and additional mitigation measures and concludes that, with these measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated.

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					The Proposed Development will result in a net gain in biodiversity as well as incorporating enhancements. The ecological mitigation and enhancement proposals, including BNG measures, are illustrated indicatively on the **Outline Environmental Masterplans (OEM) [PDA-003 to PDA-010]** and 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]**. 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.
REP1-015	WR-THPC-16	Thorganby Parish Council	Biodiversity	**Habitat creation versus agricultural restoration at decommissioning** In terms of the mitigation promised by the developers in terms of planting and additional hedgerow creation, it strikes us that this is at odds with assurances given to farmers whose land would be used that the land would be fully restored to agricultural status at the end of the project - does this mean the removal of (by then) established wildlife areas and hedgerows? How will the negative impact on wildlife of this habitat be measured and counteracted? If this is the case, then the project will visit a doubly negative impact on the wildlife within the construction areas – which surely cannot be permitted by the Inspectorate.	With regards to the Cable Route Corridor, the mode of removing the Interconnecting Cables and Grid Connection Cables during decommissioning would be dependent upon government policy and good practice at that time, which would form a requirement of the Decommissioning Environmental Management Plan (DEMP). Currently, the most environmentally acceptable option is considered to be leaving the cables in situ, however the DEMP will provide a mechanism for this to method change in the future as required. Alternatively, the cables can be removed by opening up the ground at regular intervals and pulling the cable through to the extraction point, leaving the ducting and jointing bays in place, avoiding the need to open up the entire length of the cable route. This will reduce the potential impacts arising from decommissioning within the Cable Route Corridor and it is likely any residual adverse effects from decommissioning along the Cable Route Corridor would not be significant. When the Solar Development Sites are returned back to landowners, it is likely the grassland created beneath the panels will be reverted back to agricultural land. The decision on farming practices to be employed will be made by the landowner prior to decommissioning.

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					Depending on the ecological value of the habitats that develop over the lifespan of the Proposed Development (other than the grassland beneath the panel area), it is realistic that certain areas of the Solar Development Sites may be retained due to their value for wildlife (and associated legal protections that would then pertain to that value) on decommissioning. Additionally, application of the ecological mitigation hierarchy principles and legislation surrounding biodiversity at the time will be followed. Pre-decommissioning surveys will be carried out and will inform whether any additional mitigation is required to conform with all applicable biodiversity policies and legislation at the time of decommissioning. This is set out within the approved **oDEMP [updated alongside this submission]**.
REP1-015	WR-THPC-17	Thorganby Parish Council	Ornithology	The Lower Derwent Valey NNR has been recognised by the UK Government as a Special Protection Area and a Ramsar site - Ramsar Sites are wetlands of international importance designated under the Convention on Wetlands. The area sees tens of thousands of migrating birds visiting each year. There is a great danger of massive solar arrays causing disturbance to migratory flightpaths, creating 'false lake' effects and thereby causing death, injury and displacement amongst the birdlife normally seen in the area – totally contrary to the safeguards put in place to establish the protected status of the area.	The Applicant notes the concerns raised by Thorganby Parish Council. The Lower Derwent Valley NNR, SPA and Ramsar site have been fully assessed, with all potential loss of Functionally Linked Land and/or disturbance addressed within the **Shadow Habitats Regulations Assessment (sHRA) [updated alongside this submission]**. Compliance with the Habitats Regulations is a legal requirement that must be demonstrated in order to conclude that there will be no adverse effect on the integrity of the Lower Derwent Valley. It is important to note that the Order Limits does not support comparable numbers as those associated with SPA and Ramsar sites and therefore, the numbers stated that are supported by these sites will not be directly impacted as a result of Light Valley Solar. The non-breeding bird mitigation proposed as part of Light Valley Solar provides mitigation that exceeds the level required to address the identified effects on non-breeding/migratory birds which is supported by up to five years of contextual data. This position has also been supported by Natural England. With regard to the potential 'false-lake' or otherwise known as the 'lake effect', the Applicant acknowledges that this has been investigated in relation to utility-scale solar PV, particularly in arid environments in the south-western United States, including Southern California. The hypothesis relates to polarised light reflected from solar panels potentially resembling water and attracting certain water-associated bird species. However, the evidence does not demonstrate that this is a universal effect, and the available research is predominantly derived from desert environments that are not directly comparable to the UK. The applicability of this effect to the Proposed Development should therefore be considered in the context of the local landscape (rolling farmland), habitat and bird assemblages, rather than extrapolated directly from studies undertaken in arid and international regions.

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					It is also important to note that as identified within **ES Volume 3, Appendix 12.2: Non-breeding Bird Survey Report [AS-029 to AS-031]**, all flights have been fully mapped and reviewed. There were no continual or large aggregations of flocks repeatedly seen commuting over the Order Limits.
REP1-015	WR-THPC-18	Thorganby Parish Council	Water Resources and Flood Risk	Skipwith Common's heathland has stayed almost the same for thousands of years – with its physical geography closely linked to the surrounding area and likely to suffer if watercourses and drainage around the site are disturbed.	Skipwith Common SSSI was considered conceptually for the assessment presented in **ES Volume 3, Chapter 15 – Water Resources and Flood Risk [updated alongside this submission].** This review concluded that the SSSI is upstream of the Proposed Development, and therefore not impacted. In addition, **ES Volume 3, Appendix 15.4: Outline Drainage Strategy [updated alongside this submission]** maintains that discharge rates to ordinary watercourses must be restricted to greenfield runoff rates for an ordinary watercourse, or between 1.0 – 1.4 l/s for IDB-controlled watercourses. The Drainage strategy follows a drainage hierarchy based on Building Regulations Part H and national and local SuDS policies, the principle behind which is to mimic natural drainage patterns.
REP1-015	WR-THPC-19	Thorganby Parish Council	BESS and Fire Safety	**BESS technology selection and adequacy of safety assessment** During this hearing, and in other similar hearings around the UK, the lack of regulation around BESS facilities has become abundantly clear. In this the case the applicant's lack of clarity about which BESS technology which will be employed calls their attitude to health and safety into serious question. If they are unable to state what technology will be used, how can they assess the safety record of said 'unknown' technology and how can they plan mitigation of risk around the deployment. This simply is not good enough when the potential risk to life, health, the environment and property is considered.	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 1.3.1 of the **oBSMP** clarifies that: *"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").* 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

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					to accurately define gas production which will inform the fire and explosion risk for a specific battery system. Section 1.3.13 of the **oBSMP** stipulates: "*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 NFRS 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:* *1) To ensure that fire, smoke, and any release of toxic gases do not significantly impact site operatives, first responders, and the local community; and* *2) To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite".* The Plume study of the selected BESS system commissioned at the detailed design stage will be conducted at approved third-party or government approved test laboratories. These facilities utilise large scale smoke hoods (cone calorimeters) capable to capture every type of battery gas & particle emitted during the thermal runaway process at module, battery rack or complete BESS enclosure level. This equipment can measure total volume gas production (gas chromatography) and FTIR (Fourier Transform Infrared Spectroscopy) testing (PPM) for organic compounds (toxic gases) such as: Carbon Monoxide (CO), Carbon Dioxide (CO2), Hydrogen (H2), Sulphur Dioxide (SO2), Nitrogen Oxides (NOx), Hydrogen Fluoride (HF), Hydrogen Cyanide (HCN), Hydrogen Chloride (HCl), Hydrocarbon gases (THC content), Polycyclic Aromatic Hydrocarbons (PAHs), etc. The equipment also integrates comprehensive particle capture by XRF (X-ray fluorescence) analysis checks for: Phosphorus, Aluminium, Nickel, Silicon, Calcium, etc. This means that heavy metal particulate emissions can be quantified and included in emission modelling if the selected battery system emits significant levels during fire testing. Section 4.5.15 of the **oBSMP** stipulates: "*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. Toxic gas emissions to sensitive receptors will be below relevant public health*

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					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 Compound will also be included. The ERP produced at the detailed design stage (template outlined in paragraph 4.4.4) will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider." Sections 5.1.3, 5.1.4 and 5.1.5 of the **oBSMP** mandate the key risk analysis reports (FMEA, LOPA, HMA, HAZID, HAZOP) which consider how to prevent and mitigate a multi-BESS failure incident. These reports must be provided at the detailed design stage and are BESS system and site layout specific. These types of risk analysis provide confidence to demonstrate that under day-today operation there is a low risk of a BESS failure incident, and in the event of an incident the credible hazards are understood and have been evaluated both at the illustrative and detailed design stages to demonstrate that the risk to site operatives, first responders, and the local population remains very low. 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). 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 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. The implementation of the **oBSMP** is secured through a Requirement in Schedule 2 of the **Draft DCO** [**updated alongside this submission**]. A detailed BSMP and ERPs will be developed by the Applicant in consultation with the NYFRS and the Environment Agency, these plans must be approved by North Yorkshire Council prior to construction of the BESS starting. The Detailed BSMP will be substantially in accordance with the oBSMP.

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REP1-015	WR-THPC-20	Thorganby Parish Council	BESS and Fire Safety	**BESS siting, thermal runaway and airborne emissions** With knowledge and experience of other thermal runaway events in the UK and overseas, and awareness of the release of harmful substances from such thermal events, surely a proposal to site a BESS facility alongside a populated area cannot be sanctioned? Given wind-borne pollution arising from fires at such facilities, the siting of any BESS should take into account the potential spread of harmful emissions across the wider area downwind of any site, and amend site locations to the area of least risk and impact.	As stipulated in Section 1.3.13 of the Applicant's **Outline Battery Safety Management Plan (oBSMP) [updated alongside this submission]**, 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 NFRS 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: 1) To ensure that fire, smoke, and any release of toxic gases do not significantly impact site operatives, first responders, and the local community; and 2) To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite. As recommended in National Fire Chiefs Council (NFCC) guidelines (2026) the Applicant 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 (NH_3), 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-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)

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					• 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 (NO_2). 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 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**.

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REP1-015	WR-THPC-21	Thorganby Parish Council	BESS and Fire Safety	**Firefighting water supply and contaminated water** It also seems lax in the extreme to quote Yorkshire Water as stating that there is 'no overall problem' in the provision of fire-fighting water supplies. What does this mean – that there will be times when there WILL BE a problem in water supply? Presumably such limits on availability are likely to occur in times of drought, which are becoming more frequent – and which are more likely to coincide with thermal events due to high temperatures reached during heatwaves. An average person, considering the level of risk, might reasonably predict that this could be a perfect combination of higher temperatures increasing the risk of thermal event, alongside a reduction in water availability due to drought. [The Council] concludes that the fire-fighting and contaminated water storage plans are inadequate and should not be permitted in their present form.	Section 4.3.2 of the **Outline Battery Safety Management Plan (oBSMP) [updated alongside this submission]** 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: "*A BESS design which may require direct NYFRS firefighting engagement tactics will not be selected for this facility*". 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 temperature changes measured between application periods. Section 4.3.1 of the **oBSMP [updated alongside this submission]** confirms that: "*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*." 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. The implementation of the **oBSMP** is secured through a Requirement in Schedule 2 of the **Draft DCO** [**updated alongside this submission]**. A detailed BSMP and ERPs will be developed by the Applicant in consultation with the NYFRS and the Environment Agency, these plans must be approved by North Yorkshire Council prior to construction of the BESS starting. The Detailed BSMP will be substantially in accordance with the oBSMP. The **Water Resource Assessment [updated alongside this submission]** considers the resourcing implications for firefighting water supply.

Reference ID		Interested Party	Theme(s)	Comment	Applicant Response
REP1-015	WR-THPC-22	Thorganby Parish Council	Traffic and Movement	During the lengthy construction phase of such a large-scale proposal, there is inevitably going to be a massive increase of HGV traffic onto narrow, often poorly surfaced country roads. One consequence of this is going to be a rapid degradation of already challenging roads, making driving more hazardous and damage to vehicles far more likely as HGVs break up road edges and create more potholes. There are already times when commuting traffic makes the rural road network congested, and residents having to share narrow road space with large vehicles is only going to exacerbate this problem – and over a very lengthy period of time.	The Applicant notes this comment and can confirm that the **outline Construction Traffic Management Plan (oCTMP [updated alongside this submission])** 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 North Yorkshire Council 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 North Yorkshire Council. Private access tracks used for construction access will be maintained and returned to a condition no worse than before.
REP1-015	WR-THPC-23	Thorganby Parish Council	Traffic and Movement	At certain times of the farming year, especially around harvest, the rural road network also sees a huge increase in farming traffic and large vehicles such as combined harvesters and the tractors and trailers transporting the harvest to storage facilities. To add a large amount of additional construction HGV traffic is likely to bring some areas to a standstill.	The Applicant acknowledges that the local highway network is regularly used by agricultural vehicles, particularly during seasonal farming activities such as harvest. The **outline Construction Traffic Management Plan (oCTMP) [updated alongside this submission]** includes the appointment of a Community Liaison Officer, who will act as a point of contact for local residents, businesses and landowners and will be responsible for addressing any queries or concerns relating to construction traffic. This role will support ongoing engagement with the local community to ensure that construction activities remain cognisant of agricultural operations and access requirements wherever reasonably practicable. Should any issues arise, appropriate communication and coordination measures will be implemented to help minimise disruption and maintain safe use of the local highway network for all users.
REP1-015	WR-THPC-24	Thorganby Parish Council	Traffic and Movement	What contribution are the developers prepared to make, and continue to make over the life of the scheme, to ensure that the tax and rates-payers of North Yorkshire do not have to foot the bill for the increase costs of upgrading road capacities and ongoing remedial works due to the impact of HGVs both during construction and over the life of the scheme in relation to both maintenance and the clean-up of the scheme at the end of the project? We have seen no offer whatsoever from the developer to contribute to road building and maintenance, which effectively amounts to loading part of what would effectively be capital costs of the scheme onto local residents while taking the profits offshore. We would urge the Inspectorate to impose an upfront cash levy on the developers to re-imburse NYC for the additional costs and the continue to charge them throughout the life of the project for cost increases associated with their operations and	The Applicant notes this comment and the **outline Construction Traffic Management Plan (oCTMP [updated alongside this submission])** 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 North Yorkshire Council 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 North Yorkshire Council. Private access tracks used for construction access will be maintained and returned to a condition no worse than before. During the operation and maintenance phase of the Proposed Development, there will only be a small number of vehicle trips associated with the Proposed Development. It is estimated that there will be approximately five maintenance visits per month, typically by car, appropriate 4x4 type vehicle or LGVs. HGVs may be occasionally required for the ad-hoc replacement of batteries, inverters and transformers associated with the substations and the

Reference ID		Interested Party	Theme(s)	Comment	Applicant Response
				ask that the Inspectorate liaise closely with NYC to recognise these costs and ensure that they are passed on in full.	BESS. However, the small quantity of trips for this will not generate any maintenance concerns on the highway network.
REP1-015	WR-THPC-25	Thorganby Parish Council	Arboriculture	The proposed road and junction changes planned to accommodate heavy vehicles and exceptionally large vehicles are going to entail loss of hedgerows and mature trees with subsequent impact both on wildlife and the nature of the countryside around the sites.	The Applicant acknowledges that proposed road and junction changes to achieve visibility splays and accesses will result in the loss of individual trees and lengths of hedgerow in two-fifths of the Highways Improvement Areas in the worst-case scenario . It may be possible to reduce the number of trees and lengths of hedges lost to visibility splay facilitation in the final construction plans by using alternative acceptable criteria or by using banksmen to ensure vehicle ingress/egress safety where high-value trees might otherwise be lost. Even in the worst-case scenario, the losses would be localised and widely dispersed, and therefore would not materially alter the overall character or nature of the surrounding countryside. Tree and hedge lengths lost to development will be replaced by new planting wherever possible, subject to further design works, as set out in the **outline Construction Environment Management Plan (CEMP) [updated alongside this submission]**.
REP1-015	WR-THPC-26	Thorganby Parish Council	Landscape and Visual	There is, it would seem, little to recommend in terms of turning an area from a green, pleasant and rural landscape into a mono-culture of extremely large solar panels.	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. 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. However, 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

Reference ID		Interested Party	Theme(s)	Comment	Applicant Response
					2, SDS6 and SDS7. This is consistent with paragraph 5.10.5, which states that "*virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation*." 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.
REP1-015	WR-THPC-27	Thorganby Parish Council	Cumulative and In-Combination Effects	We have seen outline plans for other planned sites to the east of Thorganby, meaning that this area is set to be surrounded by such developments and many more communities to the east of the River Derwent are likely to be negatively affected as these developments join together. Regionally, this becomes a far larger impact than the 2500 acres covered by the LVS proposal, and should be recognised as a 'bigger picture'. Can the Inspectorate be made aware of the other proposed schemes in North and East Yorkshire and be able to witness the impact of these schemes, if all approved, on the wider region? Not doing so, and treating every application as 'individual' would be a failure to see that bigger picture and realise how the combined schemes could decimate the rural landscape of the region – potentially allowing for more nuanced and considered decision taking by the Inspectorate at top level.	Information regarding cumulative effects can be found in **ES Volume 1, Chapter 17: Cumulative and In-Combination Effects [updated alongside this submission]**. Through developing the ES, each topic chapter, where relevant, has included a cumulative impact assessment, considering other committed developments in the area and potential added impacts to aspects such as traffic. The topic-specific conclusions are summarised in each relevant topic chapter of the ES and in Table 17-12 of **ES Volume 1, Chapter 17: Cumulative and In-Combination Effects [updated alongside this submission]**. The cumulative assessment has taken into account nearby developments, including other solar projects, that fall within the relevant zones of influence for each topic to evaluate potential combined effects. Many of these developments are located within North Yorkshire, with some in nearby administrative areas due to the proximity of the Proposed Development to other administrative areas. To support the ES the Applicant produced a short list of cumulative Proposed Developments, included in Table 17-11 of **ES Volume 1, Chapter 17: Cumulative and In-Combination Effects [updated alongside this submission]**, and shown visually on **ES Volume 2, Figure 17.1: Locations of Short List Cumulative Schemes [APP-142]**. Figure 17.1 names ten nearby Nationally Significant Infrastructure Projects within the study area of the cumulative assessment and includes a number of Solar Farms; but also includes the locations of other smaller cumulative developments that also includes a number of solar farms. See Table 17-11 for additional solar farms which can then be cross checked against the numbering on Figure 17.1 to locate these. A long list of 196 Proposed Developments, is included in Table 2-1 of **ES Volume 3, Appendix 17.1: Long List of Developments to Inform Cumulative Assessment [APP-189]**. The approach to establishing the list of developments to be included in the cumulative assessment is set out in Chapter 17 and aligns with PINS advice.

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					Further information is also presented in the Inter-relationships Report also submitted at Deadline 2.
Hambleton Parish Council					
REP1-009	WR-HaPC-01	Hambleton Parish Council	Cumulative and In-Combination Effects	Hambleton had housing developments approved recently for an additional 500 houses to be built, and our village has increased by 62% since 2021. I attend every planning meeting with NYC to object to these developments, but no-one seems to consider the area as a whole; they take each application on its own merit, and no-one seems to care about or understand the cumulative effect on our residents. All these dwellings are on farmland and now we face LVS taking more of this precious commodity.	Information regarding cumulative effects can be found in **ES Volume 1, Chapter 17: Cumulative and In-Combination Effects [updated alongside this submission]**. Through developing the ES, each topic chapter, where relevant, has included a cumulative impact assessment, considering other committed developments in the area and potential added impacts to aspects such as traffic, and landscape and visual impacts. The topic-specific conclusions are summarised in each relevant topic chapter of the ES and in Table 17-12 of **ES Volume 1, Chapter 17: Cumulative and In-Combination Effects [updated alongside this submission]**. The approach to establishing the list of developments to be included in the cumulative assessment is set out in Chapter 17 and aligns with PINS advice. The cumulative assessment has taken into account nearby developments, that fall within the relevant zones of influence for each topic to evaluate potential combined effects. The cumulative assessment includes a number of approved residential developments around the village of Hambleton, including residential development on land at Manor Farm, Chapel Street (ID 44), land on the northern edge of Hambleton off Snowdrop Rise (ID 50) and land at Gateforth Lane near Hambleton C of E Primary school (ID 182). The **Transport Assessment (TA) [updated alongside this submission]** considers the cumulative effects of numerous developments on the transport network, including around the village of Hambleton. Future baseline conditions within the Transport Assessment include allowance for

Reference ID		Interested Party	Theme(s)	Comment	Applicant Response
					background traffic growth through the application of TEMPro factors, and the cumulative assessment accounts for committed development within the study area. The large number of cumulative developments impacting the A63 are acknowledged within Section 6 of the TA, where a total of 3,327 committed development movements are accounted for on the A63 at Hambleton. It notes that the additional trips generated by the Proposed Development itself would be a small proportion of the future baseline traffic flows. The traffic and movement chapter acknowledges that there is potential for impacts on driver delay due to the A63/A162 roundabout being at capacity – but that future roundabout upgrades would reduce these to negligible. If roundabout upgrades are not completed prior to construction, then the impact would be mitigated with measures detailed in the **oCTMP [updated alongside this submission].** The preparation of the detailed CTMP will include a review of the construction phasing of all the committed developments and associated highway to ensure that the construction routing of traffic associated with the Proposed Development would not have an unacceptable cumulative effect on local traffic conditions. The Agricultural land and soils assessment (ES Chapter 5) notes that where known, the cumulative projects across the entirety of the cumulative assessment study area would lead to a cumulative temporary loss of 2,836 ha of agricultural land, primarily for solar generation and mineral extraction, including 1,114 ha of BMV agricultural land. Cumulatively with the Proposed Development, which would involve the temporary loss to agriculture of 486 ha of BMV agricultural land, this would represent 3.4% of the BMV land in Selby, which would be locally significant, and 0.3% of the BMV land in the Yorkshire and Humber region, which would not be significant at that scale.
REP1-009	WR-HaPC-02	Hambleton Parish Council	Landscape and Visual	We object to this application due to the massive impact on our village, instead of beautiful farmland we will witness a fundamental change to the rural landscape and experience a long-term change in its character for decades to come. Whilst grazing is proposed beneath the panels, we would ask the Examining Authority to consider evidence from existing large scale solar developments regarding the long-term condition and management of the land. The scale of the project is staggering – 1,000,000 panels, 1,000 football fields, 12 villages affected, a cable route that can be 15m wide and is anticipated to be 18 miles long, as it connects 7 other panel sites to National Grid. Doesn't that sound excessive? Doesn't even saying that out loud sound ridiculous? A million Panels? In villages with very few services. Hambleton doesn't have a Post Office or an ATM. We have one village shop, a furniture store, a garage, a hairdresser and two pubs. The only other industry we have is farming. From my garden I see more aeroplanes, tractors and trains than I do cars. I tell you this because this is how rural we are. A bus every hour – that's it. This project is 900 hectares – Selby is 980 hectares. For scale, the main built-	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. 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. 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

Reference ID		Interested Party	Theme(s)	Comment	Applicant Response
				up residential area of Hambleton is roughly 2 hectares. This proposal is 450 times larger than Hambleton village itself.	that "*virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation*." 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. Hambleton, the urban area of which extends to approximately 50ha, lies within LCA 14: Hambleton Sandstone Ridge. with reference to **ES Volume 3, Appendix 10.2: Landscape Baseline and Effects [APP-168]**, moderate adverse significant effects are predicted during construction due to the construction of the CRC to the north of the village. However, effects would be minor adverse and not significant and by year 15 of operation, with the establishment of proposed mitigation, there would be no change to the character and no residual effects on LCA 14.
REP1-009	WR-HaPC-03	Hambleton Parish Council	Cumulative and In-Combination Effects	We speak to retain our village community – Hambleton is more than a collection of houses. It is a rural community with a strong sense of identity shaped by its agricultural surroundings and shared community life. We have carols on the green at Xmas, village fetes and fabulous events through the year as we come together to share village life. Our concern is that the cumulative scale of the development risks changing the character of that community in a way that cannot be easily reversed.	The Applicant acknowledges concerns regarding potential impacts to Hambleton and the surrounding area, including impacts to the local community. The Proposed Development has been subject to detailed environmental assessment, and embedded design measures and mitigation have been incorporated to avoid or minimise effects on local receptors. This is detailed within the **Environmental Statement (ES) [APP-038 to APP-190].** For Hambleton that has included consideration of impacts to the landscape character of the local area, and viewpoints around the village. With specific regard to impacts on community amenity and the local community, this is assessed within **ES Volume 1, Chapter 13: Socioeconomics [APP-051].** The socioeconomic assessment identified, and assessed, a number of community facilities within Hambleton and concluded that potential amenity effects were negligible to minor adverse at worst, given the distance from the Solar Development Sites and with amenity effects being limited to some short term minor highways improvement works in the proximity of the village.

Reference ID		Interested Party	Theme(s)	Comment	Applicant Response
REP1-009	WR-HaPC-04	Hambleton Parish Council	The Proposed Development	This proposed development will remove the beauty of the rural location we have, and not for housing, a necessity for the future, but for commercial gain. Let's not kid ourselves that this is about net zero and about fossil fuels, there will be financial gain for the backers of this project. We can't get accurate figures for ANY financial gain to Hambleton residents, not even an estimation of reduction in fuel bills.	The **Statement of Need [APP-214]** sets out the contribution the Proposed Development will make to supporting the government's aim to ensure the supply of energy to the national energy system always remains secure, reliable, affordable, and consistent with meeting legally binding GHG emissions on the way to net zero by 2050. Chapter 10 of the **Statement of Need** describes commercial factors relating to UK power prices and how increasing the capacity of renewable assets in GB, including through large-scale ground mount solar projects, reduces the traded price of UK power and the UK's dependency on volatile international energy markets. Both of these factors apply downward pressure on bills for both local and national consumers of electricity
REP1-009	WR-HaPC-05	Hambleton Parish Council	Cumulative and In-Combination Effects	We are concerned about the disproportionate number of NSIP projects (15 in number) and 71 smaller renewable energy projects currently being considered. Hambleton PC has already been approached by another developer recently and I am sure it won't be the last. What protection can the Examining Authority give to villagers that more and more applications will not be approved as other companies seek to link into this development? We ask the Examining Authority to consider whether the cumulative assessment properly reflects the exceptional concentration of major energy infrastructure affecting this locality. Add this project to the houses being built in Hambleton and then the housing in the wider area, 1500 homes for Eggborough, 600 for Sherburn, 500 for Thorpe Willoughby, to name a couple, and when considered alongside this proposal, you should start to understand why we feel we are not being listened to and why we fear for our village identity. We ask the Examining Authority to look at the housing figures as part of this review, compare this to other areas of the Uk and ask, with this context, if the development proposals for this small part of the UK are fair, proportionate and sustainable.	The Applicant notes this comment. The Applicant has considered the potential for cumulative effects arising from other NSIP and non-NSIP projects within the **Environmental Statement (ES) [APP-038 to APP-190],** with specific regard to cumulative effects found in **ES Volume 1, Chapter 17: Cumulative and In-Combination Effects [updated alongside this submission]**. Figure 17.1 **Locations of Short List of Cumulative Schemes** [**APP-142**] shows nine other NSIP schemes considered, two of which physically intersect with the Light Valley Solar Order Limits (Yorkshire Green EN020024, and Ferrybridge Next Generation Power Station EN0110011). Since submission, three further NSIP applications have been made public in the zone of influence of the Proposed Development, taking the total to 14. In response to the Examining Authority's Rule 8 letter [**PD-006**], the Applicant has submitted a Project Inter-relationships Report at Examination Deadline 2 including an updated plan showing the additional NSIP locations. Regarding future scale and timing of development in the North Yorkshire area, including housing and employment land, the North Yorkshire Local Plan, which will guide future development and conservation in the area until 2045, will open for a first round consultation on the scope of the Plan on 23 October 2026. Future schemes, as they come forward, will need to be considered on their own merit in light of environment / built environment around them.

Reference ID		Interested Party	Theme(s)	Comment	Applicant Response
REP1-009	WR-HaPC-06	Hambleton Parish Council	Traffic and Movement	The traffic through our village is excessive now, add in the building of said homes and then this project (and others) and the cumulative transport impacts become clear. We do not even have a road crossing in the village, despite many requests for this to NYC. Overlapping construction periods and onward maintenance will massively increase HGV on our rural roads. The NPPF requires that growth should be sustainable, proportionate and appropriate to the role and character of the settlement, we ask for the same respect and consideration from this Examining Authority. National Planning policy requires development to respond positively to local character and landscape.	The Applicant notes this concern. Baseline traffic conditions on the network, including on the A63 through Hambleton, have been established using site-specific surveys and Department for Transport data, with flows presented within the **Transport Assessment (TA) [updated alongside this submission].** The Transport Assessment reviews the impact of the Proposed Development on the transport network during construction. The A63 at Hambleton is forecast to see an average of 24 additional daily movements during the construction period. This equates to a 0.2% increase in total vehicles and a 2% increase in HGVs. The assessment concludes that any temporary impacts as a result of this increase in traffic from the Proposed Development can be managed through the final Construction Traffic Management Plan (CTMP), and there is not expected to be any long-term significant impacts on the transport network. An **Outline Construction Traffic Management Plan (oCTMP) [updated alongside this submission]** has been submitted as part of the Application. The future baseline conditions within the Transport Assessment include allowance for background traffic growth through the application of TEMPro factors, and the cumulative assessment accounts for committed development within the study area. The large number of cumulative developments impacting the A63 are acknowledged within the assessment, where a total of 3,327 committed development movements are accounted for on the A63 at Hambleton. The construction phasing of all the committed developments will be considered when updating the final CTMP, to ensure that the construction routing of temporary traffic increases associated with the Proposed Development would not have an unacceptable cumulative effect on local traffic conditions.
REP1-009	WR-HaPC-07	Hambleton Parish Council	Cumulatve and In-Combination Effects	Whilst some growth may be appropriate, the cumulative scale, pace of change and development proposed within and around the village would represent a significant and rapid change in its character. The combined effect of multiple developments would result in a rate of growth that is disproportionate to the settlement's size, infrastructure capacity and rural character. The issue is not development per se, but the cumulative pace at which development is occurring. The combination of housing allocations, speculative applications and major energy infrastructure proposals risks creating a step change in the scale and character of Hambleton that is out of proportion to its role as a rural village. The cumulative effect of housing, solar farms that are approved and pending, should all be assessed together by the Planning Authority, because residents experience the combined effects rather than each project separately.	Please see the responses above on this point.

Reference ID		Interested Party	Theme(s)	Comment	Applicant Response
REP1-009	WR-HaPC-08	Hambleton Parish Council	Battery Safety	This proposal includes not only extensive solar arrays but also a Battery Energy Storage System and associated infrastructure. We note that the Applicant has submitted an Outline Battery Safety Management Plan, but we ask the Examining Authority to ensure that robust arrangements for emergency access, operational safety and long-term management are secured before development proceeds.	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 detailed design phase of the Proposed Development will consider the lifecycle of the battery system from installation (during the construction phase of the Proposed Development) to decommissioning. At the detailed design stage, the selected BESS will have undertaken Large Scale Fire Testing (LSFT) 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. LSFT of the selected BESS design is conducted to establish minimum equipment spacing distances (no fire propagation to adjacent BESS or infrastructure) and site-specific consequence modelling will provide a clear, evidence -based case for the final BESS area installation plans at the detailed design phase and will be agreed with North Yorkshire Fire and Rescue Service (NYFRS). Furthermore, a detailed Battery Safety Management Plan (BSMP) will be submitted to and approved in consultation with NYFRS, the Environment Agency (EA), and North Yorkshire Council prior to the commencement of the construction works for the BESS. Engagement will continue across the project lifecycle to ensure that all key site safety and emergency response requirements are fulfilled by the Applicant. The implementation of the **oBSMP** is secured through a Requirement in Schedule 2 of the **Draft DCO** [**updated alongside this submission**].
REP1-009	WR-HaPC-09	Hambleton Parish Council	Water Resources and Flood Risk	Residents would like reassurance regarding the long-term water requirements associated with the operation and maintenance of the development, including any water required for panel cleaning. We ask the Examining Authority to be satisfied that any operational water demand is sustainable and will not place unnecessary pressure on local water resources	The **Water Resource Assessment [updated alongside this submission]** sets out the options for water supply to the proposed development, including panel cleaning, 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 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 across the development areas. The potential connection points within the Order Limits are presented in the revised document for Deadline 2.

Reference ID		Interested Party	Theme(s)	Comment	Applicant Response
REP1-009	WR-HaPC-10	Hambleton Parish Council	Construction and Decommissioning	We are very concerned that the application lacks clarification on the 'prelimary works'. Removal of vegetation, installation of access points and remediation of land will require the use of heavy plant machinery. These activities should not be treated in the same way as the main construction which are controlled by the Construction Environmental Management Plan (CEMP) which will include traffic routes and operation hour restrictions However, we wish for the planting to be done as early as possible and including this in the preliminary works would be a benefit provided it is appropriately monitored once the development commences.	A Permitted Preliminary Works Environmental Management Plan to manage these works has been submitted into the Application at Deadline 2. This includes measures to manage advanced planting.
REP1-009	WR-HaPC-11	Hambleton Parish Council	Agricultural Land and Soils	Agriculture is central to the character, economy and identity of Hambleton and neighbouring villages. Our farmers contribute to village life in many ways and the agricultural landscape shapes the identity of the area. The cumulative loss and fragmentation of agricultural land should therefore be considered alongside the wider landscape effects. The Applicants own Environmental Statement identifies a cumulative temporary loss of 2,324 hectares of agricultural land, including 720 hectares of best and most versatile agricultural land. It concludes that the effect would be locally significant when considered at the former Selby district level.	**ES Volume 1 Chapter 5 - Agricultural Land and Soils [updated alongside this submission]** indicates a cumulative loss of 1,114 hectares of BMV quality land with the schemes assessed. The Applicant confirms that this would be a locally significant, temporary but long-term loss of agricultural land use. The cumulative schemes are primarily other solar farms and mineral extraction sites which involve land restoration and soil reinstatement post-operation. The land is therefore not permanently lost.
REP1-009	WR-HaPC-12	Hambleton Parish Council	Landscape and Visual	The Applicant also identifies a number of moderate adverse and significant cumulative landscape and visual effects affecting landscape character areas, residents, road users and public rights of way users. These findings reinforce our concern that this proposal cannot properly be considered in isolation. We urge you to avoid 'visual coalescence' – the term for the physical or visual merging of separate developments or distinct villages. In solar planning, this occurs when successive solar farms fill the open green gaps between communities, destroying their distinct rural separation. You have this across 14 Parish Councils – not 1 or 2 – 14. Imagine every journey out and everywhere you go, you'll encounter a field of panels on your route. That impact on residents is highly significant. We urge the Examiners to imagine this.	The Applicant has carried out a thorough and robust assessment of the likely cumulative landscape and visual effects in combination with other proposed developments of a similar scale and nature. This assessment is reported in Section 10. 14 of **ES Volume 1 Chapter 10 - Landscape and Visual [APP-048]**. It has been assessed that the Proposed Development is likely to lead to some cumulative landscape and visual effects during construction, year 1 of operation and decommissioning stages. No physical merging of separate developments or distinct villages has been identified. These effects represent the change to the landscape and visual experiences that would emerge during any change to the landscape, as recognised through NPS EN-1 which acknowledges in Section 5.10 that "*virtually all nationally significant energy infrastructure projects will impact the landscape'". It should be noted that with proposed mitigation in place and following initial establishment, landscape and visual impacts will generally reduce over time*." With respect to Hambleton, consideration has been given to the likely cumulative effects of the Proposed Development with the proposed Scalm Solar Farm and BESS development. Both sites are located beyond the railway line and within LCA 11: Sherburn Farmland. The proposed Scalm Solar Farm and BESS development is located approximately 1.2km north east of the village and 1.5km east of SDS8 of the Proposed Development. The LVIA concludes that cumulative effects on LCA 11 would be moderate adverse in construction and year 1 of operation, before the establishment of proposed mitigation. The distance between the Proposed Development and the proposed Scalm Solar Farm and the extensive Bishop Wood

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					means that openness between these developments would be retained and there would be no coalescence with the village.
REP1-009	WR-HaPC-13	Hambleton Parish Council	Compulsory Acquisition	On Tuesday, Mr Fox was questioned by Mr Tandy on the need for two cable routes for compulsory purchase, I think these were C1a-C4a but I am happy to be corrected. When asked why two accesses were needed, Mr Fox advised that this was because if the neighbouring solar farm application was installed before the LVS one, then they would take one route, hence the request for two options. However, yesterday, upon replying to the various speakers about visual coalescence, Mr Fox told this Examining Authority that due diligence had been done throughout the project on this subject. Clearly it has not been done if the LVS project has the same access route proposed as it's neighbour. Sounds too close for comfort to me.	The Applicant has considered the Hillam Solar Farm and that is why it identified two cable options – to provide for the scenario where that other scheme does, or does not, come forward.
REP1-009	WR-HaPC-14	Hambleton Parish Council	Landscape and Visual	We also request confirmation that no replacement installations are visually more harmful. Technology will move forward and we fear that larger or noisier panels may be installed in order to maximise output. The sizes need to be clarified through the life of the site	The **Design Parameters and Commitments document [updated alongside this submission]** secures the maximum height of the proposed solar panel arrays, which also applies to any future replacement activity.
REP1-009	WR-HaPC-15	Hambleton Parish Council	Landscape and Visual	It also seems incredible to our combined Parish Councils that panels are allowed to be built within just 30m of homes. Especially when the distance allowed for a great crested newt or a water vole is further. The visual impact on a family when their home is surrounded by panels on 3 sides is quite unimaginable and we strongly ask for redesign to be considered in these cases. The proximity to some homes is life changing. It was disappointing to hear that 'guidance' has been followed in these calculations when really a respect for those affected people has not been considered. The inclusion of a buffer of 250m from homes would show a true respect for LVS	No permanent above ground infrastructure is proposed within approximately 700m from the nearest homes on the edge of the village of Hambleton at SDS 7, which is located beyond the railway line to the north-west. The Applicant's position is that minimum offsets should be landscape-led. Notwithstanding this, paragraph 5.10.25 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

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				working with the residents. A water vole or great crested newt has to be 100-250m from a panel. Planting is not enough in our opinion; there needs to be greater emphasis on planting early so the effects on the landscape are limited for residents. It is not acceptable to be 'okay' by year 15 as the applicant stated within the Issue Specific Hearing. LVS seemed to suggest that visual impact was limited to areas around sites 6, 7 and 2. This opinion was disputed by NYC's Officer who did not accept this and we worry that NYC are unable to submit their Local Impact Report by 11.8.26 due to lack of effort, lack of staff, whatever the reason and the local residents will have to deal with this potion despite all our efforts to show our opinion. LVS stated that visual impact is classed a low consideration, and this point received some audible gasps in the hearing. If your house is surrounded on 3 sites, then this will have a massive effect on your family, your wellbeing and your mental health. The fact that VS state that we will all be better protected from the view of the panels by year 15 was correctly challenged by Inspectors. They were not happy with the limited information that suggested impacts in Year 1 but all would be ok by year 15 and that LVS had not taken reasonable considerations to other developments in the area. LVS informed landscape mitigation would largely be in the form of little 'transplant trees' that grow 1ft per annum but this did not sit comfortably with resolving glint and glare issues in the early years.	sensitivity of receptors is similar. However, it is important to note that these offsets are typically measured from residential properties, whereas the minimum 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. Regarding the adequacy of proposed planting as mitigation, the Applicant provided a detailed response to this matter at ISH1 and provided further information in **Written Summary of Applicant's Oral Submissions at ISH1 [REP1-004].** In summary, in line with best practice, the LVIA has assessed the worst-case effects at year 1 of operation in winter. It is common practice to assess residual effects at year 15 of operation in summer, by which time proposed planting will have fully established. In reality, there will be a gradual reduction in the magnitude of impact over the intervening years as those plants grow. The approach to mitigation follows well established principles and is consistent with consented solar farm NSIPs in similar landscape contexts where similar effects have been identified, such as Sunnica Energy Farm, Longfield Solar Farm and Gate Burton Energy Park. The LVIA presented in **ES Volume 1 Chapter 10 - Landscape and Visual [APP-048]** sets out the likely visual effects that would occur during construction, at year 1 and year 15 of operation and decommissioning. The Applicant has reviewed the Local Impact Report provided by North Yorkshire Council and has not identified specific concerns with the approach or findings of the assessment of visual effects, except with reference to views from the A63 across SDS2. The Applicant continues to engage with North Yorkshire Council on this and other landscape and visual matters. No reference was made at ISH1 to low consideration of visual impacts, instead a reference was made to the low value attached to views, in accordance with the LVIA methodology which follows industry standard best practice. The LVIA 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. The ExA has requested additional visual material to assist in understanding the adequacy of the proposed mitigation and the Applicant will provide this material at Deadline 3. The

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					Applicant's position remains that the LVIA is comprehensive and proportionate and that the mitigation is capable of addressing impacts on views and visual amenity within a reasonable timescale, common with other consented solar farm schemes. Information regarding advanced planting for glint and glare impacts is set out in **Written Summary of Applicant's Oral Submissions at ISH1 [REP1-004].**
REP1-009	WR-HaPC-16	Hambleton Parish Council	Traffic and Movement	We have a major concern on the traffic in our village and for the wider area. The A162/A63 roundabout has massive plans for improvement but these are unclear and without funding. NYC express concern that they do not have a firm plan and cannot foresee what that plan would look like in 3 years time. According to NYC, this Phase 1 upgrade doesn't mitigate its own traffic let alone anything more recently consent. In recognising this, NYC stated they are working on a longer Phase 2 upgrade possibly include additional lanes from developments recently approved but not yet built, but even this does not resolve a total capacity problem. In short, the roundabout is currently over capacity and will remain so. The applicant, during the hearing admitted they are still planning to use this route, but to mitigate the local effect but doing deliveries outside peak hours. This isn't something that they can control in our opinion. Sub contractors and hauliers that they employ may choose to ignore this suggestion if not fully enforced and again residents suffer this lack of control. reliant on this junction as their preferred route. They have other routes suggested but NYC don't like them. Add to this that no-one can restrict the staff that travel to these sites and we have a complete lack of control over the traffic on our roads which are already at capacity and that's before 500 houses in Hambleton are built, 600+ in Thorpe Willoughby and 600+ in Sherburn.	The Applicant notes this comment. The Applicant has engaged with North Yorkshire Council (NYC) Highways regarding proposed improvements to the A63/A162 roundabout. NYC has advised that design work is underway to increase capacity at the junction to accommodate a range of committed developments within the surrounding area, with the improvements anticipated to be completed by 2028. However, NYC has also advised that these enhancements are primarily intended to accommodate forecast traffic associated with the committed development. The **Transport Assessment [updated alongside this submission]** therefore includes an assessment of the existing operation of the junction based on observed traffic survey data collected in 2025. This demonstrates that the junction experiences distinct morning and evening peak periods, with traffic flows reducing significantly outside these times. Construction traffic associated with the Proposed Development is forecast to represent an increase of approximately 1% of total traffic on this section of the highway network. Such an increase is not expected to materially affect the operation of the A63/A162 roundabout. In addition, any temporary construction-related effects will be managed through the measures set out in the **outline Construction Traffic Management Plan (oCTMP) [updated alongside this submission].** The **oCTMP** includes timing restrictions on construction deliveries to avoid the morning and evening highway peak periods, while the proposed working hours of 07:00 to 18:00 will assist in ensuring that workforce arrival and departure patterns do not coincide with the busiest periods on the network. The **oCTMP** also sets out monitoring and management procedures. Prior to construction, the appointed contractor will be required to prepare an updated CTMP containing site-specific details, including arrangements for managing vehicle arrivals and departures to ensure compliance with any agreed timing restrictions. The updated CTMP, including its monitoring and enforcement measures, will be subject to approval by the relevant planning authority in consultation with the relevant Highway Authority.

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REP1-009	WR-HaPC-17	Hambleton Parish Council	Traffic and Movement	The route to site 4 via West Haddlesley were very clear during the hearing. Roads passing a local school, where LVS claim they have no 'receptors' showed clearly that the traffic survey had not been done accurately. There is a bridge/road with a NYC restriction upon that LVS simply advised that they would ignore. This is not acceptable and a route around West Haddessey was suggested by the PC but our concern is that this will then direct traffic through Gateforth and into Hambleton which is already highly congested. LVS continued to state, during the hearing that their surveys showed traffic levels were acceptable but local information seems to have been omitted/ignored and when objections were raised, there wa very little commitment from LVS to revisit any prior survey, work with the PC's and find a solution. We maintain their surveys are not in depth enough and lack local knowledge and accuracy	The Applicant notes this comment and can confirm that the construction 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 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 Applicant can also confirm that communication has taken place with West Haddlesey Parish Council addressing their comments on the sensitivity classification of the route through West Haddlesey and concerns about the route passing a local school. The assignment of route sensitivity is informed by various factors. The IEMA guidance identifies the factors that should be considered - and this includes the location of schools and recreational areas. It outlines that the relationship between these receptors and with the highway environmental should be examined to understand the sensitivity of hose receptors to change noting that, for example, pedestrians are less sensitive to changes in traffic if there are adequate footways and crossing facilities. There is a footway on at least one side of the road through West Haddlesey, except for where the road crosses the canal at Tankards Bridge. It is recognised that this is a pinch point on the route but vehicles approaching and using the bridge have good forward visibility. That said, the Applicant accepted that, on balance, part of the route through West Haddlesey could reasonably be considered to have a higher sensitivity to traffic changes. However, even where a higher sensitivity classification is assumed, the small increase in HGV movements associated with the Proposed Development means that the overall conclusions remain unchanged, following the application of industry assessment guidance. Traffic surveys undertaken in January and February 2025 recorded an average of 29 HGV movements per weekday at the count location in West Haddlesey near the junction with Pale Lane, with an average of 24 HGV movements per day across the full week. This demonstrates that the route through West Haddlesey already accommodates HGV traffic. In response to ISH1-15 in **Action Points from Issue Specific Hearing 1 (ISH1) [EV5-010]**, the Applicant has provided further details on the access route selection process for Solar Development Site 4 as part of the construction access strategy. The review is presented in Appendix B of **Written Summary of Applicant's Oral Submissions at ISH1 [REP1-004]** and concludes that the selected route via West Haddlesey was assessed to be the most appropriate eastern access route for construction

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					traffic, subject to the controls and mitigation, which can be discussed with NYC, secured through the final CTMP.
REP1-009	WR-HaPC-18	Hambleton Parish Council	Traffic and Movement	Hambleton PC was very disappointed that NYC advised that they have only just started wok on their Local Impact Report with relation to traffic due to lack of staff. An extra officer has now been appointed (this week – July 29th 2026) and informed the Planning Inspectorate that they won't be in a position to conclude their highways case in the Local Impact Report on 11th August. This is very disappointing for Parish Council teams. We are not planners and solicitors, we are volunteers who work full time and have the expectation of our residents in our minds. We entrust our local council to have such experts to protect the smaller villager from over development and bullying by these large developers.	The Applicant notes this comment and can confirm that a Local Impact Report has been received from North Yorkshire Council **[REP1-006]**.
REP1-009	WR-HaPC-19	Hambleton Parish Council	Water Resources and Flood Risk	We are concerned at the matters the Inspectors raised in the hearing. They seemed unsatisfied that up to date data has been used. Again NYC did not have any spokesperson on this subject to explain their position on this. The Inspectors had concerns over the height of surface water flooding and it was agreed that LVS's survey had not been done on surface water, just flooding. The Parish Councils would like the report to reflect all water effects on the land to ensure that the Planning Inspectorate satisfies us that the runaway referred to in the hearing does not run onto homes, businesses and roads or move that water onto another landowner and cause them any issues.	The Applicant notes Hambleton Parish Council's comments. The **Flood Risk Assessment (FRA) [updated alongside this submission]** has been prepared using the most up-to-date and relevant flood risk information available at the time of assessment, including Environment Agency National Flood Risk Assessment 2 (NaFRA2) fluvial and surface water flood risk mapping, together with detailed site-specific hydraulic modelling developed for the Proposed Development. The assessment considers all relevant sources of flooding, including fluvial, surface water, groundwater, reservoir and artificial sources where applicable. The site-specific modelling provides a higher level of detail than national-scale mapping and has been used to refine the understanding of local flood risk where available. The assessment considers the potential for runoff generated within the Order Limits and demonstrates that appropriate mitigation and drainage measures (set out in the **Outline Drainage Strategy (ODS) [updated alongside this submission]** will be implemented to prevent adverse effects on surrounding land. The assessment concludes that, with the embedded mitigation and drainage measures set out in the Flood Risk Assessment and the Outline Drainage Strategy, the Proposed Development would not increase flood risk elsewhere and surface water runoff from the Proposed Development will be appropriately managed and controlled to ensure no increase in off-site flood risk.

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					Further clarity on the surface water position has been provided for in the **Flood Risk Assessment (FRA) [updated alongside this submission]**.
Hillam Parish Council					
REP1-010	WR-HiPC-01	Hillam Parish Council	Agricultural Land and Soils	The proposed solar farm would remove over 1,000 hectares of productive farmland from use, including extensive areas designated as Best and Most Versatile (BMV) land (Grades 1, 2 and 3a). This land is vital to the national agricultural economy and food supply, especially at a time when global disruptions, climate uncertainty, and political instability have highlighted the UK's vulnerability. Government guidance, including the December 2024 UK Food Security Report, the May 2024 Written Ministerial Statement and Defra's 2025 Land Use Framework, reinforces the need to protect BMV land and prioritise food production. The Campaign to Protect Rural England (CPRE) suggests we are facing "a tidal wave of solar farms on greenfield sites and working agricultural land". With an increasing number of applications around the county leading to a change of use of thousands of acres of land we feel this is an inappropriate industrialisation of the rural landscape and that for such development brownfield sites should be considered. The open hearing raised multiple challenges to the idea that livestock would be able to graze under solar panels. Camblesforth solar farm was cited at the Open Hearings as an example of a 'desert landscape' that results from solar farm activity with no possibility of grazing. We ask the EA to challenge any claims for continued farming use in the presence of solar panels. Based on the proposed 40 year duration of the Solar Farm the Parish Council is unable to understand how the government's safeguarding soils strategy can be met to ensure sustainable and secure food production. This is especially relevant when over 70% of the agricultural land being proposed is either classified as Grade 2 or 3A. National planning policy is clear: significant developments should avoid high-quality farmland wherever possible. The	Refer to the Applicant's response to WR-THPC-08 for commentary on impacts on food security. **ES Volume 3 Appendix 3.1 - Site Selection Assessment Report [AS-019]** sets out the five stages of the site selection methodology. 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 alongside a number of other constraints. **ES Volume 1 Chapter 5 – Agricultural Land and Soils [updated alongside this submission]** notes at paragraph 5.10.2 that grazing of sheep beneath the solar panels is feasible but not assumed. Grazing has not been relied upon as a mitigation measure to reduce the effects of loss of agricultural land use. **Chapter 5 [updated alongside this submission]** confirms that 54% of the agricultural land across the Solar Development Sites is BMV quality, not over 70%. Chapter 5 also confirms in paragraphs 5.9.25 to 5.9.29 that there are anticipated to be significant benefits to soil health over the lifetime of the Proposed Scheme. As the soils will be left in-situ and undisturbed, the soil and land will be safeguarded for the future. National planning policy does not preclude the use of (BMV) agricultural land from development. Chapter 5 notes at paragraph 5.9.18 that 80% of the agricultural land in Selby District is estimated to be BMV quality.

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				National Planning Policy Framework (NPPF) and the National Policy Statement for Renewable Energy Infrastructure (EN-3) both emphasise the importance of using lower-grade or previously developed land for renewable energy schemes. Yet Light Valley Solar fails to justify why less sensitive sites were not selected. The project's claim of biodiversity gain does not outweigh the permanent loss of food-producing land especially in rural communities like Hillam, which have historically supported sustainable farming. The project risks long-term damage to the soil profile, particularly across Sites 6 and 7, where the PEIR acknowledges a high risk of permanent soil degradation through compaction and poor drainage. Hillam residents have shown strong support for the Hillam Parish Council objections to this development and for the Rooftops not Countryside campaign, a community-led movement opposing the massive Light Valley Solar farm proposal spanning 2,500 acres across North Yorkshire. Locals argue that while they support renewable energy, industrial-scale solar panels and BESS sites should utilize urban rooftops, car parks, and brownfield land instead of fertile farmland. The LVS response (Mr Fox) to the Open Hearing included the statement that the 'Government has not made statements on the avoidance of BMV land'. This is not the case, please see UK Government guidance on renewable and low-carbon energy which states that the "factors a local planning authority will need to consider include: encouraging the effective use of land by focussing large scale solar farms on previously developed and non-agricultural land...". Therefore, we ask the EA to consider carefully whether the applicant's assessment of the impact on agriculture and land use, both during construction and over the long operational life of the development and subsequent decommissioning, together with the proposed mitigation measures, is complete, evidence-based and sufficient.	

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REP1-010	WR-HiPC-02	Hillam Parish Council	Construction and Decommissioning	The BESS and other built structures will take-up over 19Ha of land. Over 60 years, this should be regarded as a permanent loss, not temporary	The assessment criteria used for the built infrastructure aspects has utilised thresholds relating to permanent sealing. The text within **ES Volume 1 Chapter 5 – Agricultural Land and Soils [as updated alongside this application]** has been amended at Deadline 2 to clarify this.
REP1-010	WR-HiPC-03	Hillam Parish Council	Landscape and Visual	It appears that mitigation in the form of hedgerows and woodland planting will be removed after decommissioning, just as they are coming to maturity. LVS and the EA need to consider what this will do to the landscape, visual amenity, biodiversity and ecology.	Section 2.1 of the **Outline Decommissioning Environmental Management Plan (oDEMP) [updated alongside this submission]** sets out the activities that would be carried out during decommissioning. This does provide for the removal of hedgerows and woodland, to be consistent with what is agreed with the landowners. This has been taken into account in the ES.
REP1-010	WR-HiPC-04	Hillam Parish Council	Cultural Heritage	Hillam is a historic and rural community valued for its countryside views, heritage, and village setting. The proposed development, particularly Sites 2, 3, 4 and 6, would bring industrial-scale solar infrastructure unacceptably close to nearby residential areas, with significant visual and environmental impacts. The project would introduce solar panels, battery storage units, fencing, and security cameras into open, tranquil landscapes that define our village identity. Heritage assets near the project area, including listed buildings and conservation areas, would be adversely affected. Given the huge impact on local heritage, we ask the EA to consider whether both the assessment of impact on heritage and cultural receptors and any proposed mitigating actions are good enough.	The Applicant has assessed the potential impacts upon Hillam Conservation Area and all heritage assets contained therein within **Environmental Statement Volume 3 - Appendix 8.5 Statements of Significance and Impact Assessment [APP-165]**. Hillam Conservation Area encloses the historic core of Hillam. While some more recent residential development has occurred along all edges of the conservation area, particularly to the north where it forms a conurbation with Monk Fryston, its external setting principally comprises a rural agricultural landscape predominantly used for arable farming, interspersed with narrow lanes, farm tracks, sinuous and irregularly shaped blocks of deciduous woodland. Key heritage assets within the Hillam Conservation Area include Summerhouse in the Ground of Millstone Lodge [NHLE 1316267], Hillam Hall and West House [NHLE 1296821], Former Carthouse and Stable to Hillam Hall [NHLE 1148540], Stable Block at Hillam Hall, The Coach House and House Adjoining [NHLE 1167620], Stable to Hall Farm Twenty Metres to the South of House [NHLE 1316266], Cowshed and Granary to Hall Farm Twelve Metres South East of House [NHLE 1167589], Threshing Barn to Hall Farm Ten Metres to South West of House [NHLE 1167597], Burton Cottage and Chantries Cottage [NHLE 1148539], and Hall Farmhouse [NHLE 1148538]. The closest designated heritage asset to the Order Limits is Summerhouse in the Ground of Millstone Lodge [NHLE 1316267], which is fully screened from the Proposed Development by garden walls and intervening built form. The EIA also considered undesignated heritage assets within Hillam,

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					identified by the North Yorkshire Historic Environment Record, historic map regression and site visit. Hillam Conservation Area will not receive any physical impact(s) as a result of the Proposed Development. The closest solar panels are located at a distance c.680m east of the Conservation Area within Solar Development Site 3. The closest substation is located adjacent to the BESS within Solar Development Site 2, c. 1.6km from the Conservation Area. While the introduction of the solar panels would constitute a permanent, adverse change to its external rural setting, it is considered that this impact would be minor, as the form and composition of the intervening landscape, which includes modern built form along almost all edges of the conservation area, and existing natural screening, would limit any visual or audible impacts. The EIA concludes that, at most, heritage assets within Hillam and the Conservation Area would experience a minor adverse significance of effect, with many of the assets experiencing a negligible or no effect from the scheme.
REP1-010	WR-HiPC-05	Hillam Parish Council	Alternatives and Design Iteration, and Site Selection	The Parish Council believe that the scale and dominance is a significant factor in the concerns that this development raises. Based over 4-6 plots, this is a substantial and sprawling development which would be less imposing if reduced in size or on a single site. UK Government guidance on renewable and low carbon energy states that "cumulative impacts require particular attention, especially the increasing impact that wind turbines and large-scale solar farms can have on landscape and local amenity as the number of turbines and solar arrays in an area increases".	Further details of how the Applicant has selected the site for the Proposed Development is set out in **ES Volume 3, Appendix 3.1: Site Selection Assessment Report (SSAR)[AS-019]**. The Applicant has carried out a 5 stage site selection process and identified and assessed 9 potential development areas, including the site of the Proposed Development Area. The conclusion of 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 the scale of the Proposed Development, 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. To deliver a smaller scheme than that which the Applicant has assessed as acceptable in the planning balance, leaves a vital national commodity underutilised. This would not be aligned with, and therefore would risk the achievement of, the government's plans for delivering Clean Power at an unprecedented pace and scale. The cumulative effects of the Proposed Development have been assessed in each chapter of the ES and are summarised in **ES Volume 1, Chapter 17: Cumulative and In-Combination Effects [updated alongside this**

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					submission]. This includes an assessment of the cumulative effects of the Proposed Development and other nearby proposed developments.
REP1-010	WR-HiPC-06	Hillam Parish Council	Cumulative and In-Combination Effects	The PEIR and Scoping Report identify potential harm to visual amenity and setting yet fail to fully consider cumulative impacts from other nearby infrastructure schemes, including Yorkshire Green, Noventum 50MW solar farm, the proposed limestone quarry on the A63, and additional development in Monk Fryston, Hillam and South Milford that include the major disruptions resulting from Yorkshire Water renewal of freshwater infrastructure. We ask the EA to consider that the development has significant impact on visual amenity. Here, the developer's assessment identifies potential harm, and this is greatly compounded by the cumulative impact of multiple developments that have not been assessed. We ask that the EA consider whether the developer's assessment adequately addresses the harm and mitigation	The Applicant makes note of this comment. Information regarding cumulative effects can be found in **Environmental Statement (ES) Volume 1, Chapter 17: Cumulative and In-Combination Effects [updated alongside this submission]**. Through developing the ES, each topic chapter, where relevant, has included a cumulative impact assessment, considering other committed developments in the area (including Yorkshire Green (ID 5), the proposed Limestone quarry on the A63 (ID 151), and additional developments surrounding Monk Fryston, Hillam and South Milford) and potential added impacts to aspects such as landscape and visual, and traffic. The Applicant has therefore included an assessment of the cumulative landscape and visual effects of the Proposed Development within **ES Volume 1, Chapter 10: Landscape and Visual [APP-048]**. The future baseline included in the LVIA explicitly recognises that the landscape is subject to ongoing change arising from consented energy infrastructure and other development, including solar, battery storage and transmission projects. As set out in paragraph 10.7.107, the assessment incorporates the consented Hillam Solar Farm (also referred to as the Noventum Proposed Development), which is located adjacent to Solar Development Sites 3 and 4 and is directly considered within the assessment of landscape and visual effects. The assessment concludes there will be significant adverse cumulative landscape and visual effects with three other energy Proposed Developments and a locally significant loss of BMV land (not significant at a regional level). No other significant adverse cumulative effects were found with other energy Proposed Developments.

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REP1-010	WR-HiPC-07	Hillam Parish Council	The Proposed Development	The Parish Council notes that the grid connection phase will be a secondary application, but the work will be done in tandem with the solar development. The grid connection application needs to be considered from the outset as an in-combination effect. There is likely to be significant disruption along Hillam Lane towards Burton Salmon and Brotherton. This is the main southerly route out of the village and the construction works will have a significant effect, not least with multiple HGVs per day already affecting other routes. We ask the EA to consider why this essential incremental development has not been assessed as part of the overall, cumulative effect on the local community.	The works directly required to Monk Fryston Substation for the Proposed Development are included within the Application and are outlined within section 2.5 of **ES Chapter 2: The Proposed Development [updated alongside this submission]**.
REP1-010	WR-HiPC-08	Hillam Parish Council	Compulsory Acquisition	The Parish Council recognises the attraction of this option for landowners. Based on a review of Savills web site, the suggested after-tax benefit is in the region of £600 per Ha. Based solely on these figures, the current application is a tempting proposition for struggling farmers, residents and business owners. The Parish Council is concerned that this could cause a 'domino effect' in the area with other landowners following suit resulting in a situation like the proposed 1200 acres at Camblesforth, which is not an attractive prospect	The Applicant has no control over what other landowners might do when approached by other developers of schemes in the area. That will be a commercial decision for each landowner.
REP1-010	WR-HiPC-09	Hillam Parish Council	Construction and Decommissioning	Maintenance and repair works will include the replacement of parts, including solar panels and the BESS batteries. It is evident that LVS don't know which technology will be employed on site given that technology is constantly evolving. We ask the Examiner to ensure that any repair or replacement work is linked to the same controls as the initial construction restrictions, including visual impact, noise, height.	The Applicant notes this comment. BESS technology is constantly evolving and therefore some details can only be confirmed at detailed design stage. The Application therefore assesses a reasonable worst case and the same controls committed to within the DCO will apply regardless of final design. The Outline Operational Environmental Management Plan sets out the measures that will apply to replacements, which are proportionate to the scale of the impacts associated with those works, which will be less than construction.
REP1-010	WR-HiPC-10	Hillam Parish Council	Biodiversity and Ecology	The Parish Council supports the concerns raised by the Ecology Team regarding inaccuracies in the applicant's assessment of wildlife impact. Local residents, who frequently observe diverse bird and mammal species on the agricultural land in question, have contributed valuable feedback emphasizing the need for a more thorough evaluation of ecological implications.	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) [APP-038 to APP-190]**. 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]**, A**ppendix 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]**,

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					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 [APP-044]** and **ES Volume 1, Chapter 12: Ornithology [as 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. 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.
REP1-010	WR-HiPC-11	Hillam Parish Council	Biodiversity and Ecology	Wildlife corridors will also be impacted, consider the example of roaming deer.	Impact of the Proposed Development on protected and notable species and habitats is fully considered in **ES Volume 1, Chapter 6: Biodiversity [updated alongside this submission]**. The majority of important habitats will be retained and protected, with arable land largely replaced by neutral grassland which is of higher ecological importance. The chapter concludes that, with embedded mitigation in place, no significant adverse effects on ecological features are anticipated. Similar to all UK wildlife, deer are protected from intentional ill harm and mistreatment. However, legislation surrounding deer is mostly centred around controls over poaching and culling, i.e. times of year, methods used etc. This is due to the impacts of deer overpopulation on the ecosystem and people, i.e. crops, forests and road traffic accidents. As

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					such, excluding intentional ill harm, there is no real legislative consideration for the development with regards to deer. However, commuting routes through the site of use to deer, e.g. ditches, hedgerows and their surrounding buffers, have been included throughout the Proposed Development and fencing has been designed to work around these commuting routes to ensure the habitat is not fragmented. A detailed Construction Environmental Management Plan will also be in place which will ensure wildlife will be considered during the construction phase of the Proposed Development and methods utilised to avoid harm. An **outline CEMP [updated alongside this submission]** forms part of the application documents, and the detailed CEMP must be in substantial accordance with that outline. This is secured via Requirement 12 in Schedule 2 of the **Draft Development Consent Order (DCO) [updated alongside this submission]**. Additionally, details on ecological mitigation and enhancement are detailed in the **Outline Landscape and Ecological Management Plan (oLEMP) [updated alongside this submission]**. The **oLEMP [APP 195]** includes provisions for habitat establishment, maintenance and ecological monitoring to confirm that mitigation and enhancement measures are functioning as intended and to identify and implement remedial measures where required. In securing the long-term management of habitats and delivering Biodiversity Net Gain (BNG), the Proposed Development will bring benefits to species, such as deer, through enhancing and maintaining habitats and reducing the disturbance of the Proposed Development.
REP1-010	WR-HiPC-12	Hillam Parish Council	Ornithology	There is a growing body of evidence, including a study published in Renewable and Sustainable Energy Reviews, which states that, "birds and bats are particularly threatened by large scale solar farms, as they can mistake the panels for bodies of water, a phenomenon called the Lake Effect". This confuses migrating birds and can cause birds to collide with and sustain burns from the panels. Give the exceptionally large scale of this proposed development, we ask the EA to carefully consider the impact that this application could have locally - particularly given the RSPB sites in the area.	The Applicant welcomes Hilam Parsh Councils comments and acknowledges their concerns. As per the response in REP1-015, the lake effect has been investigated in arid, international landscapes which are not comparable to the U.K. and there is no demonstratable evidence to suggest that this occurs. The applicability of this effect to the proposed development should therefore be considered in the context of the local landscape (rolling green landscapes), habitat and bird assemblages, rather than extrapolated directly from studies undertaken in arid and international regions. Furthermore, the Applicant has fully engaged with the RSPB since the submission of the PEIR through to examination (**ES Volume 1, Chapter 12: Ornithology [updated alongside this submission]**). The RSPB raises no concerns in relation to this matter, particularly the "lake effect" concern and welcomes the mitigation proposed throughout the Order Limits. The RSPB confirmed that they would not be submitting relevant representations as a result of the continual engagement and their broad support of Light Valley Solar.

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REP1-010	WR-HiPC-13	Hillam Parish Council	Biodiversity and Ecology	We ask the EA to ensure that the applicant's assessment and mitigations in relation to ecology and biodiversity are good enough for our rural location.	Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 6: Biodiversity [APP044]** and **ES Volume 1, Chapter 12: Ornithology [as 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. 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.
REP1-010	WR-HiPC-14	Hillam Parish Council	Landscape and Visual	The solar farm would be a large and visually intrusive development in a natural countryside setting. Hillam is an historic rural village whose character is defined by its open countryside, agricultural setting and long-distance views. The introduction of extensive solar arrays, battery storage compounds, security fencing, CCTV infrastructure and associated development across several sites would fundamentally alter the character of our village environment for decades. The Parish Council can see no direct or indirect benefit to the wider Hillam (and Monk Fryston) community with a loss of visual amenity due to the changing landscape either by a) the siting of the solar farm or b) the introduction of screen plants. Either solution is considered a significant detraction from the current Open Space outlook. From the top of Dunce Mire Road, residents and visitors currently enjoy uninterrupted views eastwards towards the Yorkshire Wolds. Those views form part of the identity of our village and are valued by generations of local people. Under this proposal, this will be permanently changed and children	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. 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. 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 "virtually all nationally significant energy infrastructure projects will

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				living in and travelling through our local area may never experience that rural landscape. This is not simply a temporary construction impact. It represents a forty-year change to the character of the countryside. We ask the EA to consider that the development has significant impact on visual amenity. Here, the developer's assessment identifies potential harm, and this is greatly compounded by the cumulative impact of multiple developments that have not been assessed. We therefore ask that the EA consider whether the developer's assessment of impact on landscape and visual amenity adequately addresses the harm and mitigation resulting from direct and cumulative effects. We also note that at the Open Hearing multiple local residents refuted the LVS claims that they have consulted with all residents on the impact of the proposed developments on individual residential locations. We ask the EA to investigate these claims.	have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation." 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 to avoid the immediate setting of Hillam and other villages within the study area. **ES Volume 2 - Figure 10.4.2 Zone of Theoretical Visibility (ZTV) – Screened [APP-094]** indicates that there could theoretically be some visibility from the top of Dunce Mire Road, which is a bridleway linking Lumby Hill through the centre of the village with Austfield Lane to the east. From this location SDS2 is located approximately 1.5km to the north-east, SDS3 is located approximately 1km to the south-east and SDS4 is located approximately 2km to the south-east at its closest point. Fieldwork indicates that existing mature vegetation within views travelling north along the route are substantially screened by existing dense vegetation on field boundaries and around farms, including shelter belts of conifer trees. There would not therefore appear to be any views of the Proposed Development from this location. The LVIA 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. The Applicant's position remains that the LVIA is comprehensive and proportionate and that, while some significant visual effects have been identified in year 1 of operation, the mitigation is capable of addressing impacts on views and visual amenity within a reasonable timescale, common with other consented solar farm schemes. Regarding cumulative landscape and visual effects, the Applicant has carried out a thorough and robust assessment of the likely cumulative landscape and visual effects of the Proposed Development in combination with other proposed developments of a similar scale and nature. This assessment is reported in Section 10.14 of **ES Volume 1 Chapter 10 - Landscape and Visual [APP-048].** It has been assessed that the Proposed Development is likely to lead to some cumulative landscape and visual effects during construction, year 1 of operation and decommissioning stages. These effects represent the change to the landscape and visual experiences that would emerge during any change to the landscape, as recognised through NPS EN-1 which acknowledges in Section 5.10 that "*virtually all nationally significant energy infrastructure projects will impact the landscape'". It should be noted that with proposed mitigation in place and following initial establishment, landscape and visual impacts will generally reduce over time*."

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					The Applicant has undertaken engagement with relevant near neighbours where concerns have been raised.
REP1-010	WR-HiPC-15	Hillam Parish Council	Noise and Vibration Traffic and Movement	There are an anticipated 1000 vehicle trips over the 6-to-9-month development phase. This will have a significant impact on local noise and vibration. Can the EA please consider whether the developer's assessment and mitigation is adequate. It is evident that LVS has not finalised the selection of solar panels and BESS technology. It appears for example that motorised, rotating panels are an option within this uncertain design, and we ask the Examiner to ensure that noise and other impacts on adjacent residents are considered based on the actual, selected solar panel and BESS designs.	The assessment of construction traffic noise 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, 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. The assessment of operational noise is undertaken in accordance with the British Standard 4142:2014+A1:2019 Methods for rating and assessing industrial and commercial sound, as presented in Section 11.5 of **ES Volume 1, Chapter 11: Noise and Vibration [APP-049]**. The assessment concludes that with the implementation of mitigation measures, impacts are assessed as not significant. In addition to this the Applicant has included an assessment in the Cover Letter which explains that the operation of the Tracking Solar PV Tables would not give rise to significant operational noise effects.

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					With regards to final selection of plant, 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 lead to significant effects. The Noise and Vibration Chapter then notes that: "*given this, the Applicant has committed that, as part of its submission of the detailed OEMP, it will include:* *1. Details of the operational noise mitigation measures that have been implemented as part of the detailed design;* *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;* *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* *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*." These commitments are set out in the **Outline Operational Environmental Management Plan (oOEMP) [as updated at this submission]**.
REP1-010	WR-HiPC-16	Hillam Parish Council	The Proposed Development	All large-scale, capital projects encounter major challenges and setbacks during construction, operation or decommissioning phases. Here, we seek assurance that developers and operators are not able to walk-away from important commitments such as site safety, visual and environmental impact and reconstitution of agricultural land, particularly given the cascade of ownership from Macquarie Asset Management to Island Green Power that relates to LVS. We ask the EA to consider whether there are strong enough financial protections through bonds or other measures. Here, we ask the EA to note Macquarie's investments in Southern Water and Thames Water, with UK Government currently considering renationalization to address major service failings.	Compliance with the DCO is a criminal matter. The DCO requires the various mitigation measures to be maintained. The DCO also requires a guarantee to be put in place for all compensation requirements before any compulsory powers are used.

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REP1-010	WR-HiPC-17	Hillam Parish Council	The Proposed Development	Local residents have described the design of the proposed solar project as immature, with design documents that lack clarity and detail. It is evident from the Examiner's hearings that LVS has not finalised design or selection of BESS and solar panel technologies, including whether panels should be fixed or motorised/swivelling. It is therefore unreasonable that LVS should make claims that relate for example to visual impact, specific noise criteria and height. We ask that the EA consider whether the design is adequately mature, and whether the proposed mitigating actions are good enough, particularly in terms of noise, glare and visual impact.	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 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.
REP1-010	WR-HiPC-18	Hillam Parish Council	Landscape and visual	The design does not show commitment to mitigating actions, for example in pulling back panel locations from villages and residential properties. The lack of adequate 'buffer zones' between solar panels and associated buildings and adjoining residences is a concern. Typical buffer zones for other developers can be well over 100m, far in excess of the 30m proposed by LVS, and which will have a significant impact on local residents. We ask the EA to consider the adequacy of buffer zones or 'setbacks' proposed by LVS. See the Lime Down Solar Park as an example.	As set out in paragraph 3.5.5 of **ES Volume 1, Chapter 3: Alternatives and Design Iteration [updated alongside this submission]** and enshrined in Site Specific Design Principle 6 set out in the **Design Approach Document [APP-216]**, 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, it is an established planning principle that views from residential properties are a matter of private amenity. Regarding the offsets from residential properties, the Applicant explained the rationale for the minimum 30m offset from measured from the curtilage has been defined as part of the landscape-led approach to the design of the Proposed Development. This has considered the generally flat topography and effectiveness of planting close to boundaries in mitigating significant effects. This is demonstrated through the LVIA, with the exception of one residential visual receptor associated with VP11 at Siddle Farm House, where moderate adverse significant effects would persist at year 15 of operation. This must be considered in the context of NPS EN-1 paragraph 5.10.13, which states that *"all proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites*". Hillam Parish Council's reference to 100m offsets from residential properties with respect to the Lime Down Solar Park appear to be erroneous. That scheme is seeking to secure minimum offsets of 50m. The context of the proposed Lime Down scheme is also very different, being a substantially more elevated and undulating landscape. Paragraph 5.10.25 of NPS EN-1 invites the Applicant to draw attention to other consented

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					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 typically measured from residential properties, whereas the minimum 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 as this would result in a significant operational constraint and reduction in electricity generation output, contrary to paragraph 5.10.26 of NPS EN-1. The nearest residential properties within Hillam to the Proposed Development are located on Hillam Common Lane, approximately 220m from the western edge of SDS3.
REP1-010	WR-HiPC-19	Hillam Parish Council	The Proposed Development	As a Nationally Significant Infrastructure Project (NSIP), Light Valley Solar must demonstrate compliance with national policies such as NPS EN-1 and EN-3. These policies support renewable energy in principle but require careful balancing of landscape, agricultural, and community impacts. This proposal fails on all fronts—undermining food production, rural character, and environmental integrity.	The Applicant notes concerns regarding the policy compliance of the Proposed Development, particularly the Proposed Development's alignment with NPS EN-1 and EN-3. The policy compliance of the Proposed Development is outlined further in the **Planning Statement [APP-207]** and **Policy Compliance Document [updated alongside this submission]**. Of particular relevance are Section 6: Legislative and Policy Context and Section 7: Planning Assessment, of the Planning Statement which set out an appraisal of the Proposed Development against national and local planning policies. The Planning Statement concludes that the benefits of the Proposed Development, including meeting the identified urgent need, outweigh its limited adverse impacts.

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REP1-010	WR-HiPC-20	Hillam Parish Council	Climate Change	A key element of the proposed solar PV developments is their claimed positive impact on carbon emissions over their lifetime, and yet the most recent SEPE analysis of the similar East Park Energy development identifies that the Applicant has materially understated the Scheme's lifecycle carbon emissions and materially overstated its claimed carbon savings, and transparent alternative lifecycle calculations indicate that the Scheme would generate substantially more greenhouse gas emissions than it would avoid over its lifetime. We are concerned that the LVS assessment of carbon impact may also be understated, for example does it include all costs of manufacture and shipping. Therefore, we challenged the carbon impact of the LVS application during the Open Hearing and LVS responded with references to APP046 and APP167, neither of which relate (we can find no Open Hearing transcript of the LVS [Mr Fox] response to allow us to re-check these references). Therefore, we ask that the Examiner consider, perhaps through independent validation, the expected impact of the LVS development on carbon emissions, recognising that the National Policy Statement EN-1 requires that an application must be determined in accordance with the National Policy Statements except where "adverse impacts from the development outweigh the benefits."	The Applicant has undertaken a carbon assessment that considers all aspects of project construction, including the manufacture and shipping of the panels. Full details can be found in **ES Volume 3 Appendix 9.1 [APP-166]**.
REP1-010	WR-HiPC-21	Hillam Parish Council	Human Health	Uncertainties persist regarding health risks associated with living near a solar farm. Given the concentration of village residents within half a mile of the proposed development, and considering its size and projected duration, the Parish Council strongly urges North Yorkshire Council to reject this application and similar ones in other rural villages. Instead, emphasis should be placed on identifying more suitable brownfield locations within the county for solar farm development.	Health and amenity impacts are assessed within **ES Chapter 11 for noise and vibration [APP-049]**, **Chapter 13 for socioeconomics [updated alongside this submission]**, **Chapter 14 for traffic and movement [updated alongside this submission]** and **Chapter 10 for landscape and visual [APP-048]**. Air quality (dust) and glint & glare are assessed in **ES Chapter 16, Other Environmental Matters [updated alongside this submission]**. Standard mitigation measures for air quality are set out in the Construction Dust Assessment [**APP-184**], the **outline Construction Environment Management Plan** [**updated alongside this submission**], the outline Construction Traffic Management Plan [**updated alongside this submission**], and the **outline Decommissioning Construction Environment Management Plan** [**updated alongside this submission**]. In **ES Chapter 17: Cumulative and In-Combination Effects [updated alongside this submission]** the assessment identifies and evaluates situations where a single human receptor or human receptor group may be subject to more than one type of residual effect from the Proposed Development. The assessment aims to determine whether these effects could interact with each other to result in more significant effects than those already identified for each receptor or receptor group on a topic by topic basis. In the context of traffic, dust, visual, noise & vibration, and glint & glare during construction and operation, the in-combination assessment does

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					not identify any increase in the significance of effects predicted in the ES chapters.
REP1-010	WR-HiPC-22	Hillam Parish Council	Human Health	Expressing apprehension about the solar farm's proximity to Hillam village, the Parish Council is concerned about the potential increase in solar-related crime incidents, a trend documented nationally. Drawing criminal activities closer to the village could result in a rise in residential-related crimes	Management Plans are being implemented throughout the project, which outline design considerations with regard to safety and security for the project and local residents. The **Outline Construction Environmental Management Plan (oCEMP) [updated alongside this submission]** sets out measures for managing security and reducing the risk of crime during construction. It notes that Site security during construction will be managed by the Contractor(s). The Site security fencing will remain in place throughout the duration of the construction period. Any storage of materials will be kept secure to prevent theft or vandalism. A safe system for accessing the materials storage areas would be implemented by the Contractor(s). Security measures may include security lighting on temporary site compounds and permanent structures; and security fencing. All security measures would be designed in with the ecological clerk of works. The **Outline Operational Environmental Management Plan (oOEMP) [updated alongside this submission]** sets out that during operation the boundary of the Solar Development Sites will be secured by both fencing and by the provision of Closed-Circuit Television (CCTV) equipment. Cameras would be placed on galvanised steel painted green poles with a maximum height of 3 m. Perimeter fencing will be deer wire mesh and wooden post fencing with a maximum height of 2.5 m. All new access tracks will be secured by gates, which will be set back from the public highway. Where existing access tracks are used that also provide access to residential properties, appropriate security measures will be put in place in consultation with the relevant property owner(s). There will be palisade fencing around the substations and BESS compound which will have a maximum height of 3 m. Motion sensing security lighting would be provided within the substation compounds and within the BESS Compound to be used to maintain safe working conditions in winter months, security purposes, and maintenance activities. Regular lighting is not required within the majority of the Solar Development Sites during the operation phase of the Proposed Development.

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					Other potential security measures expected to be included comprise: 1) Detection systems such as beam break and image detection to raise alarm when fence breached; 2) Audio announcement when intruder detected to warn alarm triggered and police on way; 3) Barriers / locked gates at main entrances to the Sites; 4) Steel doors on substation buildings; 5) Buried cables, as much as practicable; 6) Remote monitoring; and 7) Alarm response contract with keyholder/security company. Within the **Outline Public Rights of Way Management Plan (oPROWMP) [APP-199]**, Section 3.18 outlines how PRoWs will be managed to ensure security and safety, including appropriate signage and fencing. With these security measures in place the Proposed Development is not anticipated to result in an increase in crime. There is no evidence that the presence of a solar farm leads to increased crime within surrounding communities.
REP1-010	WR-HiPC-23	Hillam Parish Council	Site Selection	The developers recognise that the site is in the green belt but believe they have "very special circumstances" to consider this application acceptable. We believe this application has failed to acknowledge residents' sentiment towards preserving the green belt within the boundaries of Hillam. Over the past couple of years, the Parish Council has spent considerable public funds in planning related disputes to preserve the green belt. If a development such as this were to go ahead, it would make a mockery of all the good work undertaken by Parish Councillors, local government councillors and Selby District Council as was. There are anecdotal articles (e.g. see Simon de Bruxelles, The Times) that suggest that allowing development such as this in the greenbelt may pave the way for future residential development. There are more appropriate locations for solar infrastructure, such as rooftops, brownfield sites, and degraded land, which would avoid the environmental and social costs of building on agricultural greenfield sites. National guidance encourages solar on less sensitive land, and emerging policies such as the New Homes (Solar Generation) Bill support these alternatives. Light Valley Solar's justification is based on connection to the Monk Fryston substation does not excuse the inappropriate site selection near Hillam and surrounding villages	The Applicant acknowledges that Solar Development Sites 2, 3 and 4, as well as areas of the Cable Route Corridor, plus temporary Construction Compound 5, are wholly or partly located within the West Yorkshire Green Belt. Green Belt was a consideration in the Site Selection process as set out in the **Site Selection Assessment Report [AS-019].** Section 7.5 of the **Planning Statement** [**updated alongside this submission**] and the **Policy Compliance Document** [**updated alongside this submission**] provide full details of how Green Belt has been considered. The Proposed Development does not constitute inappropriate development in the Green Belt whereby it is: - located on grey belt land, and it would not fundamentally undermine the purposes, taken together, of the remaining Green Belt across the area of the plan, - there is a demonstrable unmet need for the Proposed Development as evidenced in the Applicant's Statement of Need, and - the site is sustainably located taking into account the nature of the Proposed Development and the negligible trip generation associated with its operational needs. With regard to other future development within the Green Belt, any proposals would be brought forward independently of the Proposed Development. In such cases the applicant for any other development proposal would be required to demonstrate compliance with relevant local

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					and national planning policies contemporary with the time of any such application, including Green Belt where the land remains designated as such. The Proposed Development would not establish a precedent for any other type of development and would not make the land within the Order limits 'brownfield land'. Rooftop and brownfield solar schemes are needed alongside, but not instead of, large-scale ground mount solar schemes. Section 7.3 of the **Statement of Need [APP-214]** provides more information on this point.
REP1-010	WR-HiPC-24	Hillam Parish Council	Alternatives	The developers have been asked if alternative methods of generation have been considered. They state wind generation has been ruled out due to current legislation. The Parish Council interpret the current guideline to be a) a suitable site is identified and b) there is no local objection. Plots 4, 5 & 6 are adjacent to a field which already has a wind turbine. Anyone local will tell you that Hillam Common is a very windy plain. We would suggest that this may be a suitable site. In terms of local objection, that is an unknown quantity until appropriate canvassing has been undertaken. While solar panels cover their entire contiguous footprint (preventing other uses), wind turbines physically occupy less than 1% of the total land within a wind farm. This leaves up to 95% of the surrounding land perfectly usable for agriculture or grazing. Around 10,000 solar panels could be needed to generate as much electricity as a single, modern wind turbine. Furthermore, onshore wind energy is cheaper than solar farms, see LCOE data below (source Energy Institute). We ask that the EA examine whether developers have adequately considered alternative methods or combinations of energy generation.	The Applicant's consideration of alternative technologies is set out in section 3.9 of **ES Volume 1, Chapter 3: Alternatives and Design Iteration [updated alongside this submission].** The Applicant is a solar and battery development company and therefore is focussed on delivery of solar and battery technology. The Applicant recognises that the 2015 moratorium on English onshore wind developments was lifted in July 2024. As set out in section 3.9 of Chapter 3, it is acknowledged that onshore wind has been developed in areas close to the Proposed Development. However, as set out in the **Statement of Need [APP-214]**, with the moratorium having been in place for such a long time, onshore wind development pipelines in England are currently thin. Re-establishing a pipeline of onshore wind schemes in England may take some time. Further, by following good design principles solar schemes can generate a similar amount of energy per hectare of land as onshore wind, due to the distance required between turbines. Therefore, the use of onshore wind over solar does not offer any particular benefit in terms of electricity generation per hectare. 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 in onshore wind may come forward to support the delivery of the Government's onshore wind capacity ranges (set out in Table 1 of the **Statement of Need**) in addition to, rather than as an alternative to, the Proposed Development. As to the use of agricultural land, the Applicant has taken a sequential approach, by initially considering previously developed sites and lower grade agricultural land in its site selection assessment. Further details are provided in **ES Volume 3, Appendix 3.1: Site Selection Assessment Report [AS-019]**.

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REP1-010	WR-HiPC-25	Hillam Parish Council	Agricultural Land and Soils	Concerns around land availability are likely to increase over the next couple of years due to other developments, climate change and geopolitical issues affecting UK supply. These factors should also be taken into consideration when looking at this application.	The Applicant notes this comment.
REP1-010	WR-HiPC-26	Hillam Parish Council	Battery Safety	The BESS site selection is of concern to Hillam PC. The National Fire Chiefs Council states that "BESS fires are challenging to extinguish and can continue to burn from several hours to several days. A fire in Liverpool, in 2020, lasted 3 days. Smoke plumes from fires can also harm air quality. However, trying to extinguish fires using water can result in large volumes of contaminated fire-water runoff which can have a long-term impact on the environment. As a result, the prevailing view when it comes to firefighting tactics is to adopt a 'controlled burn' to minimise runoff whilst protecting the surrounding area from flame and heat impingement". In short, fire authorities may 'let it burn' for long periods with consequential impact on the local area. NY Fire & Rescue state that developers should ensure "the BESS is located with due considerations of impact on communities, sites and infrastructure". The NFCC also recommends safety features in the design of BESS, including "gas and fire detectors, explosion control systems, and water supplies for emergency services in case a fire does occur". Therefore, we ask the EA to seek a thorough assessment of the impact of BESS location, safety measures, emergency response and environmental impact, and to challenge the LVS selection of BESS location. At the Open Hearing, LVS (Mr. Fox) responded with reference to APP216, and yet the 'BESS Location Selection Criteria' (Table 3-6) do not include any consideration of air quality risks to local residents in the event of a fire incident or to the risks to water contamination following any incident.	The Applicant has submitted an **Outline Battery Safety Management Plan (oBSMP) [updated alongside this submission]** which 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. The safety objectives for the design of the BESS site are listed in Section 1.3.10 - 1.3.13 of the **oBSMP**. 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 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]**. 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. As recommended in National Fire Chiefs Council (NFCC) guidelines (2026) the Applicant commissioned a Plume Analysis study presented in **Environmental Statement Volume 3 - Appendix 16.5 BESS Fire**

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					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 (NH_3), 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-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 (NO_2). 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 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

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					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.** 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** preconstruction 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 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. Real world, worst -case scenario BESS fires have involved fires that have generally consumed two BESS enclosures i.e. fire has propagated from one BESS to another BESS unit. The worst-case propagation of four BESS enclosures occurred in Lyme, New York which involved battery systems integrating NMC pouch cells in air cooled modules, these battery systems will not be for the Proposed Development.

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					These worst-case real-world incidents have involved legacy BESS systems which had not undertaken LSFT, many systems were not NFPA 855 or UL 9540 compliant. The Applicant regularly evaluates BESS system defect and root cause analysis reports to inform all critical aspects of BESS safety required for procurement, construction, installation, commissioning, and decommissioning phases of projects. Factory Acceptance Testing (FAT) and Site Acceptance Testing (SAT) are key components in ensuring credible BESS failure scenarios are prevented and fully mitigated should they occur. The BESS Location Selection Criteria in Table 3-6 of the **Design Approach Document [APP 216]** sets out that locations within 100m of residential properties were avoided for fire safety reasons. This reflected air quality risks to local residents in the event of a fire incident.
REP1-010	WR-HiPC-27	Hillam Parish Council	Site Selection	It was also commented (LVS, Mr Fox) at the Open Hearing that "no brownfield sites offer this connectivity" (referring to the grid connection at Monk Fryston). We find this hard to agree with, when considering potential sites such as Ferrybridge. Can the EA please consider the adequacy of the LVS assessment of alternative sites.	The Applicant's point at the Open Floor Hearing was not that there was not connectivity to brownfield land, but that no brownfield locations were suitable for the Proposed Development. The Applicant has considered previously developed land (PDL) including brownfield, contaminated and industrial land as set out in **ES Volume 3, Appendix 3.1: Site Selection Assessment Report (SSAR) [AS-019]**. None of the sites identified were suitable to accommodate the Proposed Development, either individually or in combination with other sites. Only one brownfield site over 40 ha was identified via local authority brownfield land registers (being 42.71 ha of land at Olympia Park, Barlby Road, Barlby) but this land is subject to a live planning application related to the wider Olympia Park Development Site. All other brownfield sites within the search area were below the 40 ha minimum site threshold. Further details are provided in paragraph 2.5.22 of the **Site Selection Assessment Report (SSAR) [AS-019]** regarding the 40 ha threshold and why sites below this size were generally considered unviable in terms of connectivity. A review of the contaminated land registers for the relevant local authorities revealed no sites suitable for consideration. Various industrial land parcels were considered as set out in Table 2-1 of the **Site Selection Assessment Report (SSAR) [AS-019],** but none were considered suitable for the Proposed Development, with many with conflicting existing or proposed uses. Further, specific brownfield sites raised in consultation have been considered and discounted, as set out in **ES Volume 1, Chapter 3: Alternatives and Design Iteration [updated alongside this submission]** (see Tables 3-1 and 3-2). This includes sites at Riccall, Wistow, Gascoigne Wood, Ferrybridge and Eggborough. With regard to Ferrybridge in particular, as set out in Table 3-1 of Chapter 3, Ferrybridge C power station closed in 2016 and the land is either already built on or is the subject of proposals for development by Mount Park (with planning permission), or is the subject of the SSE Ferrybridge

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					Next Generation Power Station DCO proposal. Therefore the land is not available to accommodate the Proposed Development.
REP1-010	WR-HiPC-28	Hillam Parish Council	Community Benefits	Despite the scale of this proposal, the developer has provided no meaningful or defined benefit for Hillam or its residents. Vague promises of "community enhancement" and footpaths do not justify the permanent industrialisation of the countryside. Residents' quality of life, property values, and access to open landscapes would be significantly harmed. Hillam and Monk Fryston are both attractive and sought after villages. The villages have quite a unique feel about them compared to others in the area. This is in part due to the limited residential sprawl but also due to the lack of industrialisation of the immediate rural landscape. Residents have voiced concerns that there may be detrimental effects on house prices in the village. By completing a basic Google search, it is easy to establish that homes within close proximity to such developments do see reductions in price and those few properties that will be surrounded by the development will become much less desirable without their currently sprawling views of open countryside. We believe that the proposed developments need to identify community benefits explicitly. The Parish Council has previously received a letter of intent for a separate solar development offering financial community benefits of £1500 per Mw, yet we have seen no progress or engagement from the developer in delivering these benefits. Equally, it is hard to quantify an appropriate "benefit" based on the perceived "harm" to all residents in the affected area. Ideally the "community benefit" would not be monetary, but there appears to be little obvious gain from this development, for all affected residents. The effects of a "one off" monetary injection will be short lived, considering the "harms" associated with the development will be felt significantly during the construction phase, and to differing degrees during operational and decommissioning phases. It would then be remiss of the Parish Council not to capitalise on any "community benefit" if a decision to proceed goes ahead.	The Applicant's community benefit package is a matter separate to the planning process. The Applicant's socio-economics assessment is robust, and the Applicant has put forward a suite of appropriate management measures for all phases of the Proposed Development.

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				We ask that the EA ensure that developer's assessment of socioeconomic effects is of high quality, and for the EA to consider whether the mitigating actions are good enough.	
REP1-010	WR-HiPC-29	Hillam Parish Council	Traffic and Movement	There are an anticipated 1000 vehicle trips over the 6-to-9-month development phase. The construction and operation of the project will cause significant disruption to local residents. Increased traffic on the A63, the A162 and local roads such as Common Lane and Hillam Lane will bring noise, dust, and congestion, exacerbated by other projects in the area. Our local MP Keir Mather has raised grave concerns about the A63 with regards to existing volumes of traffic and road safety, given the lack of a road crossing to assist school children and other residents. The A63/A162 island is already a bottleneck, resulting from HGV traffic from Sherburn industrial estates and new housing developments combining with through traffic from Monk Fryston, Hillam, Hambleton, Thorpe Willoughby and Selby. The Parish Council appreciates that the traffic management plan avoids passing through the centre of Hillam's conservation area but is concerned about the number of HGVs navigating the northerly end of Austfield Lane. Hillam villagers know that Austfield Lane is narrow, has very limited passing places and is heavily used, not only by vehicles but by horse riders, cyclists, walkers, many with pushchairs, and dog walkers.	The Applicant notes these comments. The temporary increases in traffic flows and composition has been assessed and the **Transport Assessment [updated alongside this submission]** concluded that any temporary impacts from the Proposed Development could be managed through measures detailed in the outlined **Construction Traffic Management Plan (CTMP) [updated alongside this submission]**, and there is not expected to be any long-term significant impacts on the transport network. The **oCTMP** includes measures such as timing restrictions to avoid use of the A63/A162 junction during the peak hours. Baseline traffic data collected in 2025 showed Austfield Lane was used on average by over 800 vehicles a day (approx. 28 of which are HGVs). The Proposed Development would result in a temporary 3% increase in overall traffic, but the forecast 15 HGV trips associated with the Proposed Development would increase HGV trips by 52%. The Applicant considers that this temporary increase can be managed and proposes the use of temporary passing places which can be delivered within the highway boundary to facilitate the HGV construction movements. The need for any temporary traffic management measures, including the provision of passing places, would be included in the updated CTMP and agreed with the Local Highway Authority prior to the commencement of construction.
REP1-010	WR-HiPC-30	Hillam Parish Council	Public Rights of Way	Overall, the lack of footpaths by these roads is a concern with increased HGV traffic. The roads are generally narrow, of minor road construction with many verges that have been previously damaged or eroded. There are also old dyke bridges that may be in danger of collapse based on the proposed volume and weight of traffic that will be generated by the development. We believe that the developer commitment to accessible routes, woodland and rights of way is inadequate. For example, a clearer network of footpaths or other rights of way could ease residents' concerns with regards to traffic. Here we support the comments of the British Horse Society, that PROWs are not properly defined or differentiated, permanent diversions and permissive paths are vague e.g. lengths not defined. We ask the EA to consider whether the developer's assessment of impact on rights of way and mitigating actions is good enough.	The Applicant acknowledges these concerns. The effects of the Proposed Development on Public Rights of Way, recreational access and community receptors 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 access receptors are anticipated. The Applicant notes that the Public Rights of Way network and permissive path proposals are clearly identified within the **oPRoWMP. Figure 3 - Public Rights of Way and Permissive Paths Enhancements and Diversions** identifies the location and extent of proposed permissive paths, diversions and enhancements. The **oPRoWMP** also identifies the intended user groups for the proposed permissive paths. Exact details of

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					the location, alignment and length of individual permissive paths are provided within Figure 3 of the **oPRoWMP [APP-199].** The Applicant also notes that the **oPRoWMP** differentiates between footpaths, bridleways and other Public Rights of Way, and includes information relating to proposed diversions, enhancements and relevant Definitive Map Modification Orders (DMMOs). The proposed permissive path network has been designed to provide additional connectivity and recreational opportunities for a range of users, including pedestrians, cyclists and equestrians. The management of construction traffic and its interaction with Public Rights of Way users is addressed through the **outline Construction Traffic Management Plan (oCTMP) [updated alongside this submission]** and the **oPRoWMP [APP-199**]. These documents include measures to manage construction traffic movements, maintain access where practicable, provide signage and information for users, and reduce potential conflicts between construction vehicles and users of walking, cycling and equestrian routes. Taking account of the proposed mitigation measures, the permissive path enhancements and the management measures secured through the **oPRoWMP** and **oCTMP**, the Applicant considers that the Proposed Development provides a clear and defined strategy for maintaining and enhancing recreational access and would not result in significant adverse effects on Public Rights of Way users or recreational access.
REP1-010	WR-HiPC-31	Hillam Parish Council	Construction and Decommissioning	Preliminary Works are proposed following any planning approval but prior to official commencement of development. The scope of the works would go beyond minor to include removal of vegetation, installation of access points and remediation of land which could involve large-scale ground works, requiring the use of heavy plant machinery. We are concerned that this will generate HGV traffic and should not be allowed to be undertaken ahead of the main consented works which would be controlled by the Construction Environmental Management Plan (CEMP) and which includes traffic routes and operational hour restrictions.	A Permitted Preliminary Works Environmental Management Plan to manage these works has been submitted into the Application at Deadline 2. This includes measures to manage advanced planting.
REP1-010	WR-HiPC-32	Hillam Parish Council	Traffic and Movement Landscape and Visual	Construction activity will cause damage to local roads and margins, and we seek assurance that local councils will not have to fund repairs. Can the EA please assure us that the liability for remediation remains with the applicant. On the other hand, early landscape mitigation planting should be encouraged as early as possible and including this in the preliminary works would be a benefit provided it is appropriately monitored once the development commences.	The Applicant notes this comment and the **outline Construction Traffic Management Plan (oCTMP, [updated alongside this submission**]) 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 North Yorkshire Council 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 North Yorkshire Council. Private access

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					tracks used for construction access will be maintained and returned to a condition no worse than before. All proposed planting is embedded within the design of the Proposed Development. It is important to note that planting increases in effectiveness as it establishes, year on year. Further information was provided on this in item 4.7(a) of **Written Summary of Applicant's Oral Submissions at ISH1 [REP1-004]**. Paragraph 4.31 of GLVIA3 states that "*Mitigation measures, especially planting schemes, are not always immediately effective. Advance planting can help to reduce the time between the development commencing and the planting becoming established*." The Applicant acknowledges the value of advance planting where warranted by the assessment evidence. However, the evidence does not demonstrate a need for advance planting beyond those locations affected by glint and glare. Committing to advance planting in all circumstances would extend beyond what is reasonably necessary to make the development acceptable in planning terms. The proposed commitment therefore represents a proportionate response to the identified effects, providing mitigation where justified whilst retaining flexibility to deliver the landscape strategy illustrated on the OEM across the SDSs. The Applicant will endeavour that other planting will be carried out as early as practicable within the construction period, where it does not conflict with construction processes, but this is not a requirement in the context of the conclusions of the ES.
REP1-010	WR-HiPC-33	Hillam Parish Council	Traffic and Movement	The Parish Council notes that the plan has been amended in relation to access to site 3 and subsequently sites 4, 5 and 6, avoiding trying to get heavy traffic from Chapel Street onto Stocking Lane. To facilitate heavy vehicle access, it is assumed that this "access road" is quite substantive. The PC, on behalf of the users of the sports facilities on Stocking Lane (and other village events) would like the developer to consider a long term "access road" that could be utilised as part of a "one way" access route for Stocking Lane. There are an increasing number of parking and congestion issues caused by the increased use of the Stocking Lane venues. We ask that the EA consider whether the developer's assessment of impact on traffic and transport, and proposed mitigating actions, are adequate given the current and well reported risks and traffic jams in the area. We also ask the EA to press NY Council for a thorough assessment of highways impact and alternative routes before any approval is considered.	The Applicant notes this comment but would advise that the access strategy does not include the use of Stocking Lane.

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REP1-010	WR-HiPC-34	Hillam Parish Council	Water Resources and Flood Risk	The area is vulnerable to surface water issues, especially given the clay and sandy soil composition, and the loss of vegetation during construction could exacerbate flood risks. Many historic land drains are unmapped and could be damaged by large-scale developments. We have seen the impact even for small-scale, local projects where floods resulted from land drain damage. Historic assessment of the area around Monk Fryston and Hillam has shown that it suffered greatly from flooding in previous generations, only being recovered through drainage and flood defence measures, which may be threatened by the proposed developments. If LVS plan any elevated installations, to avoid flooding areas, then height limits on panels and buildings and hence visual impact would be of concern.	**ES Volume 3, Appendix 15.4: Outline Drainage Strategy (ES Volume 3) [updated alongside this submission]** maintains that discharge rates to ordinary watercourses must be restricted to greenfield runoff rates for an ordinary watercourse, or between 1.0 – 1.4 l/s for IDB-controlled watercourses. The Drainage strategy follows a drainage hierarchy based on Building Regulations Part H and national and local SuDS policies, the principle behind which is to mimic natural drainage patterns. 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. **Appendix 15.1: Flood Risk Assessment (FRA) [updated alongside this submission]** includes an assessment of interactions between flood defences and the Cable Route Corridor in Annex H, with reference to **ES Volume 2, Figure 15.14: Spatial Flood Defences [APP-128]**. Cable Route Corridor 1-4 is shown to cross existing flood defences on the River Ouse. However, with the implementation of standard best-practice measures during construction, including monitoring and adherence to relevant environmental standards and obtaining the necessary environmental permits, it is concluded that the proposed works can be completed without compromising the integrity or functionality of existing flood defence assets. The **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.
REP1-010	WR-HiPC-35	Hillam Parish Council	Water Resources and Flood Risk	We also ask the EA to consider whether the applicant has adequately assessed the demand for the millions of litres of water required for each cleaning cycle of the solar panels, throughout the operational life of the development, and whether detailed assessment has taken place with Yorkshire Water and others, to ensure local residents will not be adversely affected during periods of peak demand. LVS (Mr Fox) cited APP204 in Open Hearing response, but this shows only 0.27 litres per m2 of panel per clean cycle, yet other sources indicate 2 to 4 litres per m2 (see e.g. Science Direct articles). Here we note the problems encountered at the Cleve Hill solar farm in the Southeast. We also ask the EA to ensure	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. Runoff from the BESS, substation and other hard standing areas will be managed by the implementation of a surface water drainage system. Runoff emanating from the BESS areas as a result of a fire would be effectively managed (within **Outline Battery Safety Management Plan [updated alongside this submission]**) to prevent the untreated

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				that water requirements for BESS firefighting be considered as part of these assessments, along with managing the impact and recovery cost from contaminated water post any fire incident. We ask the EA to confirm that the developer has thoroughly considered all forms of impact on the water environment, including drainage and flooding risks.	discharge of contaminated firewater to surface or groundwaters. A drainage strategy will be in place at the operational phase, the outline Drainage Strategy is presented within **Appendix 15.4: Outline Drainage Strategy (ES Volume 3) [APP-182]**.
Monk Fryston Parish Council					
REP1-011	WR-MFPC-01	Monk Fryston Parish Council	Construction and Decommissioning	Preliminary Works: There is a concern that the scope of the 'preliminary works' requested by LVS go far beyond the scope of the minor works. The requested works include removal of vegetation, installation of access points and remediation of land which could in fact entail large-scale ground works. These are works that would require the use of heavy plant machinery. The concern of MFPC is that these works are potentially large-scale activities and will generate additional HGV traffic. These works should not be allowed to be undertaken ahead of the main consented works. Any preliminary works entailing the movement and operation of large plant should be covered by the Construction Environmental Management Plan (CEMP) which will include traffic routes and operation hour restrictions. However, early landscape mitigation planting should be encouraged as soon as possible and including this in the preliminary works would be a benefit, provided it is appropriately monitored once the development commences.	A Permitted Preliminary Works Environmental Management Plan to manage these works has been submitted into the Application at Deadline 2. This includes measures to manage advanced planting.
REP1-011	WR-MFPC-02	Monk Fryston Parish Council	Construction and Decommissioning	Maintenance works (replacing installations during the 60-year lifespan): As indicated by the applicant, over the lifetime of the proposed project major assets such as solar panels and BESS batteries, will need to be replaced. MFPC ask that the Examining Authority seek to assign conditions to ensure that any replacement asset works are tied to the same controls as the initial construction restrictions (solar panel height for example) unless there is significant good reason for any deviation on the approved design. This is to ensure any replacement installations are not visually more harmful to the character and landscape of the area and all impacts are captured in this Environmental Assessment as the 'worst case scenario'.	The relevant controls for replacement periods have been set out in the Outline Operational Environmental Management Plan, which are commensurate to the lesser amount of activities that will take place compared to the construction phase.

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REP1-011	WR-MFPC-03	Monk Fryston Parish Council	Agricultural Land and Soils	Agricultural Land Quality/ Best and Most Versatile Land (BMV): Through discussions the applicant accepted that Best and Most Versatile land parcels had not been considered to ensure minimal use of this type of land in the design process. Equally, 19.1 hectares of land would be taken up by the BESS installation and its associated structures and assets. Over 60 years this is regarded by MFPC as an unacceptable permanent loss of land. MFPC asks that the Examining authority fully considers this oversight by the applicant in its assessment.	**ES Volume 3 Appendix 3.1 - Site Selection Assessment Report [AS-019]** sets out the five stages of the site selection methodology. 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. The inclusion of BMV quality land within the Proposed Development is not an oversight. **ES Volume 1, Chapter 5: Agricultural Land and Soils [updated alongside this submission]** notes at paragraph 5.9.18 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. **The Design Approach Document [APP-216]** sets out how Best and Versatile Land was taken into account in the design evolution and avoided where practicable.
REP1-011	WR-MFPC-04	Monk Fryston Parish Council	Landscape and Visual and ecology	Removal of landscape areas at the end of the project: Not withstanding the loss of BMV associated with the landscape mitigation areas, MFPC have serious concerns over the proposed removal of these landscaping areas at the end of 60 years at a time when the planting will be mature. If it is LVS's intention to remove this new habitat then it would be wrong to regard this as a positive factor in any BNG calculation. Where it is included in the BNG calculation, the BNG assessment needs to include an additional assessment where these areas are removed. MFPC asks that the Examining authority requests the applicant to carry out an additional BNG assessment for removal of habitat where appropriate.	A BNG assessment is not required for the removal of and planting at decommissioning stage, as at this point in time it is not clear how much would actually be removed, based on landowner preference. It would be their preference that would lead to the impacts caused rather than the Proposed Development.
REP1-011	WR-MFPC-05	Monk Fryston Parish Council	Noise and Vibration	The applicant advised that solar panels would have the potential to swivel by means of motor control. MFPC have a particular concern with the excessive noise generated by the BESS installation up to a level of 91dBa. With Monk Fryston residents being immediately affected by this noise pollution. MFPC ask that the Examining Authority ensure noise mitigation measures are implemented to ensure noise is reduced to an absolute minimum in and around the BESS installation. MFPC would ask that the Examining Authority ensure the applicant can demonstrate noise impact is minimised to acceptable limits within the design.	The assessment of operational noise which includes BESS and associated infrastructure, 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]**. Further information about the sound power levels of the assessed sources are presented in **ES Volume 3, Appendix 11.3: Operational Noise and Vibration Assumptions and Results [APP-173]**. Typical noise levels from BESS Containers and BESS conversion units are presented within Table 2-1 of this appendix. The relevant sound power levels of plant items have been inputted into a three-dimensional noise model to predict noise emissions to environment in line with the industry guidance and relevant standards. Mitigation measures to minimise any adverse impacts upon nearby receptors are presented in section 11.8 of **Chapter 11: Noise and Vibration [APP-049]**. Measures include site selection, location of sources, plant orientation, implementation of noise barriers, and plant selection. Results of the noise prediction at the closest sensitive receptors are presented within Table 2-2 of Appendix 11.3. The location of the receptors

Reference ID		Interested Party	Theme(s)	Comment	Applicant Response
					is illustrated in **Figure 11.2 Environmental Sound Survey and Assessment Locations [APP-098]** and results of noise modelling also presented in **Figure 11.3 Operational Noise Modelling results Predicted Daytime Sound Rating Level [APP-100**], **Figure 11.4 Operational Noise Modelling Results - Predicted Night time Sound Rating Level [APP-101]** and **Figure 11.5 Operational Noise Modelling Results - Predicted Daytime Sound Rating Level [APP-102]**. The assessment concludes that with the implementation of mitigation measures, impacts are assessed as not significant. In addition to this the Applicant has included an assessment in the Cover Letter which explains that the operation of the Tracking Solar PV Tables would not give rise to significant operational noise effects. With regards to final selection of plant, as noted in Section 11.8 Embedded and good practice mitigation and enhancement measures of **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 lead to significant effects. The Noise and Vibration Chapter then notes that: "*given this, the Applicant has committed that, as part of its submission of the detailed OEMP, it will include:* *1. Details of the operational noise mitigation measures that have been implemented as part of the detailed design;* *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;* *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* *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*." These commitments are set out in the **Outline Operational Environmental Management Plan (oOEMP) [updated alongside this submission]**.

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REP1-011	WR-MFPC-06	Monk Fryston Parish Council	Traffic and Movement	Traffic/Transport: As raised before, MFPC have major concerns with regards to traffic issues from the proposed LVS development and other recent and pending schemes which will use the A63 and A162. From the discussions to date by NYC, it has been stated that the A63/A162 roundabout to the West of Monk Fryston is now severely over capacity and NYC are in the process of planning remedial works to counter some of the capacity issues but not resolve them. MFPC are extremely concerned that the LVS scheme will cause further congestion and issues along these routes and would ask that the applicant further address their traffic management plan to minimise the additional disruption. This review should include routes for abnormal loads. Where appropriate, LVS should be contributing financially to the upgrades in line with the impact of their proposals. MFPC are also concerned that due to the scale and design of the proposal, any future A63 bypass route to the Northeast of Monk Fryston from the A63, will be lost as solar panels will occupy the land corridor required for the bypass. This location is the only viable route left and given the expected rise in traffic volumes by LVS and other consented and future schemes. MFPC would ask that these considerations are reviewed by the applicant and the design altered accordingly to accommodate future bypass construction.	The Applicant notes this comment. The Applicant has engaged with North Yorkshire Council (NYC) Highways regarding proposed improvements to the A63/A162 roundabout to the east of Monk Fryston. NYC has advised that design work is underway to increase capacity at the junction to accommodate a range of committed developments within the surrounding area, with the improvements anticipated to be completed by 2028. However, NYC has also advised that these enhancements are primarily intended to accommodate forecast traffic associated with the committed development. The **Transport Assessment [updated alongside this submission]** therefore includes an assessment of the existing operation of the junction based on observed traffic survey data collected in 2025. This demonstrates that the junction experiences distinct morning and evening peak periods, with traffic flows reducing significantly outside these times. Construction traffic associated with the Proposed Development is forecast to represent an increase of approximately 1% of total traffic on this section of the highway network. Such an increase is not expected to materially affect the operation of the A63/A162 roundabout. In addition, any temporary construction-related effects will be managed through the measures set out in the **outline Construction Traffic Management Plan (oCTMP) [updated alongside this submission].** The oCTMP includes timing restrictions on construction deliveries to avoid the morning and evening highway peak periods, while the proposed working hours of 07:00 to 18:00 will assist in ensuring that workforce arrival and departure patterns do not coincide with the busiest periods on the network The Applicant is not aware of any formal proposals or safeguarded plans for an A63 bypass. In the absence of a defined scheme, route alignment or land requirements, it is not possible for the Proposed Development to make specific provision for, or accommodate, a future A63 bypass but as noted in the response to RR-1450 in **The Applicant's Response to Relevant Representations Part 2 - Additional Submission [AS-036]** the Proposed Development would not infringe the bypass scheme, with cables being run underground.
REP1-011	WR-MFPC-07	Monk Fryston Parish Council	Water Resources and Flood Risk	Flood Risk and Drainage: Discussions have indicated that the applicant has not used up to date data for flood risks. This is of particular concern for MFPC, given that solar panels and the BESS would be installed on land with surface water flooding which may require these structures being raised up outside the flood risk level. This could result in solar panels being raised above 4.5 metres, the worst case scenario assessed in application material. MFPC would ask that the Examining Authority ensures that the applicant designs an installation that meets with the height	The Applicant notes the concern regarding flood risk data and the potential implications for the height of solar panels and BESS infrastructure. The **Flood Risk Assessment (FRA) [updated alongside this submission]** has been prepared using the most up-to-date and relevant flood risk information available at the time of assessment, including Environment Agency National Flood Risk Assessment 2 (NaFRA2) fluvial and surface water flood risk mapping, together with detailed site-specific hydraulic modelling developed for the Proposed Development. The assessment considers all relevant sources of flooding, including fluvial, surface water, groundwater, reservoir and artificial sources where

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				requirements of any consent granted and that up-to-date flood risk data is used within the design process.	applicable. The site-specific modelling provides a higher level of detail than national-scale mapping and has been used to refine the understanding of local flood risk where available. The **FRA [updated alongside this submission]** identifies that the majority of the Solar Development Sites are at very low risk of surface water flooding, with areas of elevated risk generally limited to existing watercourses, field boundaries and localised topographic depressions. No significant overland flow pathways have been identified across the Solar Development Sites. Where localised flood risk is present, this will be effectively managed through the detailed siting and design of infrastructure, including the application of minimum finished floor level and freeboard requirements for flood-sensitive assets. Surface water runoff arising from the Proposed Development will be managed in accordance with the **Outline Drainage Strategy [updated alongside this submission]**, including measures to retain the existing greenfield runoff response within the Solar PV areas and the provision of appropriate drainage and runoff controls for the BESS. The **FRA [updated alongside this submission]** concludes that the embedded mitigation measures incorporated to address fluvial flood risk are also sufficient to address localised surface water flood risks. Accordingly, the Applicant does not anticipate flood mitigation requirements resulting in infrastructure heights exceeding the parameters assessed in the Environmental Statement. The **FRA [updated alongside this submission]** submitted at Deadline 2 will provide further clarification on this matter.
REP1-011	WR-MFPC-08	Monk Fryston Parish Council	Battery Safety	Water Supply and BESS Safety and Health Risks: MFPC are concerned with the vague nature of the applicant's response to the water requirements for construction and operation of the installations. MFPC would ask that the Examining Authority ensures the applicant can demonstrate adequate water supplies are available on a site-by-site basis and not as an overall satisfactory summary. MFPC also have further concerns with regards to the BESS installation and fire fighting capability. MFPC are to understand that there are currently no universally accepted methods for extinguishing lithium-ion or lithium-ion fires. If this technology is utilised for the proposed BESS installation. MFPC would ask that the Examining Authority ensure the applicant has considered the extensive risks to residents' health, both in short and long term from these types of fires, in terms of toxic vapour clouds, thermal runaway and explosion.	Section 4.3.2 of the **Outline Battery Safety Management Plan (oBSMP) [updated alongside this submission]** 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. The water resource implications for this are considered in the updated **Water Resources Assessment** submitted at Deadline 2. The Applicant's OBSMP has been drafted to clearly 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. Section 1.3.13 of the oBSMP stipulates: "*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*

Reference ID		Interested Party	Theme(s)	Comment	Applicant Response
				MFPC ask that the Examining Authority ensure the applicant can demonstrate adequate firefighting capability is available for the installation to minimise these risks and they also can demonstrate the process for capture and the safe disposal of any contaminated water following a fire particularly as there is no extensive body of water in proximity to the proposed BESS location. To this end particular concerns relate to the amount of water required to extinguish these types of fires, typically over several hours or days. MFPC ask that the Examining Authority to ensure that the applicant can demonstrate that there are suitable mitigations in place to prevent contamination of the drainage ditches We would like to restate that the site of the BESS is bounded by drainage ditches. MFPC ask that the ask that the Examining Authority ensures that the Environment Agency and any other appropriate body is engaged to assess and advise the management of risks associated with drainage and potential environmental contamination.	*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 NFRS 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:* *1) To ensure that fire, smoke, and any release of toxic gases do not significantly impact site operatives, first responders, and the local community; and* *2) To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite".* 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 also stipulates: "*A BESS design which may require direct NYFRS firefighting engagement tactics will not be selected for this facility*". 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 temperature changes measured between application periods. Section 4.3.1 of the oBSMP confirms that: "*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*." 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. Section 3 of the oBSMP comprehensively covers all BESS fire and explosion prevention, detection, and mitigation system safety requirements.

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					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 preconstruction 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 observed in real world incidents, by requiring evidence that propagation risk is controlled through design rather than reliance on emergency intervention. Most current BESS systems are designed to safely burn out without internal fire suppression systems (to remove the risk of stranded energy in the battery systems), Large Scale Fire Testing (LSFT) must be conducted to demonstrate that loss will be safely limited to one enclosure without the intervention of fire fighters. Most current BESS designs that have undergone LSFT integrate LFP prismatic cells and have demonstrated fire propagation does not occur to other BESS enclosures at distances ranging from 15cm – 100cm to adjacent or back-to-back BESS enclosures with spacing of 3-3.5 metres across from the next row / block of BESS enclosures. 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. Real world, worst -case scenario BESS fires have involved fires that have generally consumed two BESS enclosures i.e. fire has propagated from one BESS to another BESS unit. The worst-case propagation of four BESS enclosures occurred in Lyme, New York which involved battery systems integrating NMC pouch cells in air cooled modules, these battery systems will not be for the Proposed Development. These worst-case real-world incidents have involved legacy BESS systems which had not undertaken LSFT, many systems were not NFPA 855 or UL 9540 compliant. The Applicant regularly evaluates BESS system defect and root cause analysis reports to inform all critical aspects of BESS safety required for procurement, construction, installation,

Reference ID		Interested Party	Theme(s)	Comment	Applicant Response
					commissioning, and decommissioning phases of projects. Factory Acceptance Testing (FAT) and Site Acceptance Testing (SAT) are key components in ensuring credible BESS failure scenarios are prevented and fully mitigated should they occur. 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 (NH_3), 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-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 (NO_2). 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.

Reference ID		Interested Party	Theme(s)	Comment	Applicant Response
					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 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, including in Monk Fryston. 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. 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]**.
REP1-011	WR-MFPC-09	Monk Fryston Parish Council	Landscape and Visual	Landscape: MFPC are concerned with the cumulative impact on character. Although the applicant suggests that this is limited to sites 2, 6 and 7, MFPC would ask that the Examining Authority explore this more deeply with the applicant, the applicant does not appear to have adequately covered other major developments in this impact assessment. It remains our concern that Monk Fryston residents will feel the visual impact of these and other recently consented energy schemes when travelling in all directions into and out of the village. Moreover, with regards to landscape mitigation. The use of 'transplant trees' with a growth rate of only 1 foot per year as stated by the applicant, in MFPC's opinion would not mitigate the view of the 4.5-metre-high solar panels for many years to come, thus not adequately addressing glint and glare issues, particularly in the early years of deployment.	The Applicant has carried out a thorough and robust assessment of the likely cumulative landscape and visual effects in combination with other proposed developments of a similar scale and nature. This assessment is reported in Section 10. 14 of **ES Volume 1 Chapter 10 - Landscape and Visual [APP-048]**. It has been assessed that the Proposed Development is likely to lead to some cumulative landscape and visual effects during construction, year 1 of operation and decommissioning stages. These effects represent the change to the landscape and visual experiences that would emerge during any change to the landscape, as recognised through NPS EN-1 which acknowledges in Section 5.10 that "*virtually all nationally significant energy infrastructure projects will impact the landscape'". It should be noted that with proposed mitigation in place and following initial establishment, landscape and visual impacts will generally reduce over time*." With regard to views in and around Monk Fryston, it is noted in the landscape and visual baseline summarised in **ES Volume 1 Chapter 10 - Landscape and Visual [APP-048]** that existing industrial, commercial and

Reference ID		Interested Party	Theme(s)	Comment	Applicant Response
					residential development is a common feature. This is the baseline against which cumulative landscape and visual effects have been assessed. In combination with the cumulative developments assessed, it is not considered that the Proposed Development would increase the significance of effects on people's views and visual amenity in the long term. The delivery of the proposed landscape and visual mitigation and enhancement measures will be secured through the **Design Parameters and Commitments document [updated alongside this submission]** and the **Outline Landscape and Ecological Management Plan (oLEMP) [updated alongside this submission].** The oLEMP includes measures for implementing and managing advanced planting in section 4.2. The proposed locations for advanced planting specifically required to address potential glint and glare effects are shown in **ES Volume 2, Figure 16.1: Advanced Planting for Glint and Glare Mitigation [APP-141].** Information regarding advanced planting for glint and glare impacts is also set out in **Written Summary of Applicant's Oral Submissions at ISH1 [REP1-004].**
REP1-011	WR-MFPC-10	Monk Fryston Parish Council	Landscape and Visual	Visual Impacts on nearby receptors: Following the July 2026 Public Examination meeting MFPC and individual contributors raised severe concerns with regards to proximity of the proposed development to residential properties. This is having a detrimental effect on individuals mental health. MFPC ask that the Examining Authority review this topic in greater detail with the applicant, especially in regard to a buffer zone of 250 metres between the development and residential dwellings. This buffer zone has been enforced on other similar schemes across the Country. From discussions it became clear that individual properties and residents had not been contacted directly to discuss concerns raised. MFPC would suggest this is conflict with reasonable consultation practice. MFPC would ask that the developer is directed to resolve these matters at the earliest opportunity.	The Applicant notes the references to larger buffer zones from residential properties to solar farm development of up to 250m but cannot find evidence of this being secured for other consented solar farm DCOs. Where larger offsets are sometimes referred to, this is regarding equipment such as BESS and inverters. Applying blanket offsets of 250m is not considered a proportionate response. Paragraph 5.10.26 of NPS EN-1, states that "*reducing the scale of a project can help to mitigate the visual and landscape effects of a proposed project. However, reducing the scale or otherwise amending the design of a proposed energy infrastructure project may result in a significant operational constraint and reduction in function – for example, electricity generation output*. There may, however, be exceptional circumstances, where mitigation could have a very significant benefit and warrant a small reduction in function. In these circumstances, the Secretary of State may decide that the benefits of the mitigation to reduce the landscape and/or visual effects outweigh the marginal loss of function." The Applicant's position is that minimum offsets should be landscape-led. Notwit7hstanding this, NPS-EN1 paragraph 5.10.25 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 typically measured from residential properties, whereas the minimum 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

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					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 measures which are capable of reducing the majority of residual landscape and visual effects to not significant. A wider offset would not reduce the landscape and/or visual effects to such an extent as to outweigh the loss of function and cannot therefore be justified based on the evidence presented.
REP1-011	WR-MFPC-11	Monk Fryston Parish Council	Community Benefits	Community Benefit: There have been previous commitments from the developer to deliver Community Benefits as a means of mitigation for the proposed development. However, when the applicant was pressed on this matter at the July 2026 Public Examination meeting, the response conflicted with the original LVS public consultation position. At the July 2026 Public Examination Meeting, the applicant suggested the matter was outside the scope of the examination and governed by a separate legal requirement. This is in fact not the case and a misrepresentation as the Governments community compensation scheme remains in draft and there is currently no other mechanism. MFPC would ask that the Examining Authority press the applicant to disclose their intentions with regards to Community Benefit as a matter of consultation clarity. Although this aspect may not be required under the Planning process, Community Benefits have been offered, at the applicant's public consultation events, in mitigation. Disclosure of applicant intentions on this matter would provide clarity for affected communities. Some residents may have decided not to submit a response based on the fact the applicant has offered substantial benefits. If this is not in writing then those residents have been prejudiced by the applicants u-turn.	Case law (*R(Wright) v Resilient Energy Severndale Limited and Forest of Dean Council)* has clearly established that community benefits are not a matter to be considered in the planning process. The Applicant will continue to discuss this matter with North Yorkshire Council.
Skipwith Parish Council					
REP1-013	WR-SkPC-01	Skipwith Parish Council	The Proposed Development	We heard what for the applicant had to say in response at the end of each session about having 'considered', 'assessed' and 'taken into account' all the points raised by those who spoke in the hearings. We do not find those statements on behalf of the applicant convincing at all and rely on the Planning Inspectorate to dig deep in examining whether or not the reassurances are justified and properly meet the objections raised. We ask the Planning Inspectors to give critical and sceptical examination to these reassurances it has been given by LVS and satisfy themselves that the proposed development is a realistic one, where necessary mitigations and many legitimate concerns of the local communities have been	The Applicant notes this concern. The Applicant considers that matters regarding mitigation and community concerns have been addressed as far as reasonably practicable. The Proposed Development has been subject to detailed environmental assessment (as detailed in the chapters of the **Environmental Statement [APP-038 to APP-190]**, extensive consultation and ongoing engagement with local communities, landowners, local authorities and statutory consultees. Where concerns have been identified, the Applicant has sought to avoid, reduce or mitigate potential effects through project design, embedded mitigation and additional commitments as set out within the application documents and subsequent examination submissions.

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				properly addressed by the applicant. From what we heard we do not think they have, most probably because fully addressing them would jeopardise their cause. The individual landowners who spoke at the hearings had clearly, we believe, not been meaningfully consulted about the severe impact this development as presently scoped would have on them.	With regard to consultation, the Applicant undertook its consultation in compliance with all legislation and guidance on consultation (See **Consultation Report Appendix 1: Statement of Compliance [APP-025]**), as well as commitments made in its published Statement of Community Consultation (See **Consultation Report Appendix 4: Statement of Community Consultation Materials [APP-028]**), which in turn was informed by consultation with the relevant host authority. This process is described in Chapter 6 (Preparation for Statutory Section 47 Consultation) of the **Consultation Report [APP-024].** Where residents have raised specific concerns with the Applicant, it has engaged with them.
REP1-013	WR-SkPC-02	Skipwith Parish Council	Cumulative and In-Combination Effects	We also wish to make a submission in relation to the density of energy infrastructure projects in this area south of York. An examination of the applicant's drawing titled 'Other Nearby Committed Developments relevant to the Proposed Development' (Rev P01 of drawing LVS-302939-696) would suggest that even without LVS's scheme the area is already saturated with energy infrastructure projects. Were this scheme to be permitted, we say the density of energy infrastructure projects in this relatively small part of North Yorkshire would be more than excessive.	The Applicant notes these concerns. The presence of multiple energy projects does not indicate that a development is unacceptable, and in the context of the NPS recognising that a large amount of electricity generation capacity needs to be brought forward in the UK. The Applicant has undertaken cumulative effects assessments within chapters of the **Environmental Statement [APP-038 to APP-190]** and **ES Volume 1, Chapter 17: Cumulative and In-Combination Effects [updated alongside this submission]**, having regard to relevant committed developments and has identified mitigation where necessary. The assessments conclude that the Proposed Development would not give rise to unacceptable cumulative effects that would preclude consent being granted.
South Milford Parish Council					
REP1-014	WR-SMPC-01	South Milford Parish Council	Agricultural Land and Soils	The Campaign to Protect Rural England (CPRE) suggests we are facing 'a tidal wave of solar farms on greenfield sites and working agricultural land'. With an increasing number of applications around the county leading to a change of use of thousands of acres of land, we feel this is an inappropriate industrialisation of the rural landscape and that for such development, brownfield sites should be considered.	NPS EN-3 paragraph 2.10.21 provides that while land type should not be the predominating factor, applicants should where possible utilise previously developed land and, where use of agricultural land has been shown to be necessary, poorer quality agricultural land should be preferred. NPS EN-1 paragraph 2.10.23 recognises that at this scale, solar developments will use some agricultural land. In line with the above policy, the Applicant has considered previously developed land including brownfield, contaminated and industrial land as set out in **ES Volume 3, Appendix 3.1: Site Selection Assessment Report (SSAR) [AS-019]**. None of the sites identified were suitable to accommodate the Proposed Development. Further, specific brownfield sites raised in consultation have been considered and discounted, as set out in **ES Volume 1, Chapter 3: Alternatives and Design Iteration [updated alongside this submission]** (see Tables 3-1 and 3-2). This includes sites at Riccall, Wistow, Gascoigne Wood, Ferrybridge and Eggborough. The Applicant has also taken a sequential approach to the use of agricultural land, initial focussing 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

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					(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.
REP1-014	WR-SMPC-02	South Milford Parish Council	Construction and Decommissioning	The scope of the preliminary works goes beyond what could be considered minor and includes: the removal of vegetation, installation of access points and remediation of land, which could entail large-scale ground works, requiring the use of heavy plant machinery. We are concerned that these larger scale activities will generate HGV traffic and should not be allowed to be undertaken ahead of the main consented works which are controlled by the Construction Environmental Management Plan (CEMP), which will include traffic routes and operation hour restrictions. We do, however, welcome early landscape mitigation planting, provided it is appropriately monitored once the development commences.	A Permitted Preliminary Works Environmental Management Plan to manage these works has been submitted into the Application at Deadline 2. This includes measures to manage advanced planting.
REP1-014	WR-SMPC-03	South Milford Parish Council	Construction and Decommissioning	The Applicant acknowledged that maintenance and repair works will include the replacement of parts, including solar panels and the BESS batteries. It is evident that the Applicant does not as yet know what technology will be used, given that technology is constantly evolving. We ask the EA to ensure that any repair or replacement work is linked to the same controls as the initial construction restrictions, including visual impact, noise, height and that no replacement installations are visually more harmful. For example, the solar panel height replacement in the years ahead are not taller in the landscape than those consented in the initial decision.	The relevant controls for replacement periods have been set out in the Outline Operational Environmental Management Plan, which are commensurate to the lesser amount of activities that will take place compared to the construction phase

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REP1-014	WR-SMPC-04	South Milford Parish Council	Construction and Decommissioning Agricultural Land and Soils	The EA established the following: • 19.1Ha of land would be taken up by the BESS and other built structures. Over 60 years, this is regarded as a permanent loss, not a temporary loss. • 1/3rd of the site would be landscaping or bird mitigation areas. This would be returned to agriculture at the end of the project. The EA were rightly concerned that the 60 years of mitigation, in the form of hedgerows and woodland planting will be removed after decommissioning, just as they are coming to maturity. Therefore, we ask the EA to consider whether the Applicant's assessment of the impact on agriculture and land use, throughout the life-time of the project (from construction through to decommissioning), together with the proposed mitigation measures, is complete, evidence-based and sufficient.	A Technical Note has been produced for Deadline 2 to enhance the assessment of permanent effects on agricultural land and soils, taking into consideration the potential for mitigation areas to remain after decommissioning.
REP1-014	WR-SMPC-05	South Milford Parish Council	Design Iteration	Local residents have described the design of the proposed solar project as immature, with design documents that lack clarity and detail. It is evident from the hearings that the Applicant has not finalised the design or selection of BESS and solar panel technologies, including whether the panels should be fixed or motorised/swivelling. This is to enable whoever develops the site in the future to have the freedom of choice when considering technological options. The Applicant is simply seeking to gain approval for what they consider to be a worst-case scenario. It is therefore unrealistic for the Applicant to make claims that relate to aspects such as visual impact, height and specific noise emissions. We ask that the EA consider if the design is adequately mature, and whether the proposed mitigating actions are good enough, particularly in terms of visual impact and noise.	The EIA presented within the ES has been undertaken adopting the principles set out in the Planning Inspectorate's Advice Note Nine: Rochdale Envelope Nationally Significant Infrastructure Projects: Advice pages - GOV.UK. The advice note acknowledges there may be aspects of the Proposed Development design that are not yet fixed and, therefore, it may be necessary for the EIA to assess likely worst-case variations. Para 2.4.12 of **ES Vol 1, Chapter 2 [updated alongside this submission]** sets out the assumption of using a Rochdale Envelope and notes that the basis of assessment for the Proposed Development, is the limits of deviation shown on the Works Plans and the matters secured via the **Design Parameters and Commitments document [updated alongside this submission]** The **Works Plans [EN0110012/APP/LVS/02.03]** indicate the maximum spatial extents within which the different types of development can be located and this has informed the assessment of environmental impacts It is necessary that there will be some flexibility built into the design of the Proposed Development when submitting the DCO Application so that the detailed design of the Proposed Development can be informed by technical considerations, post-consent work, and take advantage of innovation in technology. This is of particular importance in order to maintain flexibility due to the rapid pace of change in solar PV and battery storage technology, whilst maintaining a robust and comprehensive assessment of potential effects. Where such flexibility or optionality is required, this is explained throughout this chapter. The technical assessments therefore assess an 'envelope' within which the works would take place (the Rochdale Envelope). As such, the DCO Application and EIA is based on maximum and, where relevant, minimum parameters. These parameters have been considered in detail by technical authors as part of the EIA to ensure the realistic worst-case effects of the Proposed Development are assessed for each potential receptor.

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					The parameters assessed within this ES are described in detail in Table 2 1. Each technical chapter has assessed the likely worst-case scenario for that discipline in order to determine effect significance based on these parameters and any requirements for mitigation for aspects such as visual impact, height and specific noise emissions are based on a worst-case scenario. The **Design Parameters and Commitments document [updated alongside this submission]** submitted as part of the DCO Application provides the maximum parameters for the detailed design of the Proposed Development and is secured by a requirement in the **Draft DCO** [**updated alongside this submission**]. 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. For the noise and vibration assessment, there is a clear commitment in the **Outline Operational Environmental Management Plan (oOEMP) [updated alongside this submission]** to deal with changes to design which would change operational noise – the updated noise impact assessment will demonstrate that noise impacts are no worse than assessed in the ES.
REP1-014	WR-SMPC-06	South Milford Parish Council	Noise and Vibration	It is evident that the Applicant has not finalised the selection of solar panel and BESS technology. It appears for example that motorised, rotating panels are an option within this uncertain design. We ask the EA to ensure that noise and other impacts on adjacent residents are considered based on the actual, selected solar panel and BESS technology.	The assessment of operational noise is undertaken in accordance with the British Standard 4142:2014+A1:2019 Methods for rating and assessing industrial and commercial sound, as presented in Section 11.5 of **ES Volume 1, Chapter 11: Noise and Vibration [APP-049]**. Further information about the sound power levels of the assessed sources are presented in **ES Volume 3, Appendix 11.3: Operational Noise and Vibration Assumptions and Results [APP-173]**. Typical noise levels from BESS Containers and BESS conversion units are presented within Table 2-1 of this appendix. The relevant sound power levels of plant items have been inputted into a three-dimensional noise model to predict noise emissions to environment in line with the industry guidance and relevant standards. Mitigation measures to minimise any adverse impacts upon nearby receptors are presented in section 11.8 of **Chapter 11: Noise and Vibration [APP-049]**. Measures include site selection, location of sources, plant orientation, implementation of noise barriers, and plant selection. Results of the noise prediction at the closest sensitive receptors are presented within Table 2-2 of Appendix 11.3. The location of the receptors is illustrated in **Figure 11.2 Environmental Sound Survey and Assessment Locations [APP-098]** and results of noise modelling also presented in **Figure 11.3 Operational Noise Modelling results Predicted Daytime Sound Rating Level [APP-100**], **Figure 11.4 Operational Noise Modelling Results - Predicted Night time Sound**

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					Rating Level [APP-101] and **Figure 11.5 Operational Noise Modelling Results - Predicted Daytime Sound Rating Level [APP-102]**. The assessment concludes that with the implementation of mitigation measures, impacts are assessed as not significant. In addition to this the Applicant has included an assessment in the Cover Letter which explains that the operation of the Tracking Solar PV Tables would not give rise to significant operational noise effects. With regards to final selection of plant, 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 lead to significant effects. The Noise and Vibration Chapter then notes that: "*given this, the Applicant has committed that, as part of its submission of the detailed OEMP, it will include:* *1. Details of the operational noise mitigation measures that have been implemented as part of the detailed design;* *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;* *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* *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*." These commitments are set out in the **Outline Operational Environmental Management Plan (oOEMP) [updated alongside this submission]**.

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REP1-014	WR-SMPC-07	South Milford Parish Council	Traffic and Movement	In relation to the A63/A162 Monk Fryston roundabout, NYC confirmed that this roundabout is currently operating above capacity. The Phase 1 upgrade (due 2027) will not mitigate the current traffic flow, not to mention the increase in traffic expected as a result of the new commercial and residential developments in the area. As a result, NYC stated they are working on a longer Phase 2 upgrade which would possibly include additional lanes, but even this would not resolve the capacity problem. The Applicant admitted they are reliant on this junction as their preferred route and their only solution was to time deliveries outside peak hours. This is a completely inadequate response to the problem as the majority of the heavy traffic at the roundabout will come from the new commercial developments in the Sherburn Industrial Estate, most of which work on a 24hr shift rotation.	The Applicant notes the concerns raised regarding the operation of the A63/A162 Monk Fryston roundabout and the potential influence of background traffic growth and other committed developments in the area. The assessment presented within **Environmental Statement Volume 1 Chapter 14: Traffic and Movement [updated alongside this submission]** and the **Transport Assessment [updated alongside this submission]** considers future baseline traffic conditions, including traffic growth and committed development movements, such that the effects of the Proposed Development have not been assessed in isolation. The assessment therefore adopts a robust approach to considering cumulative traffic conditions on the highway network during the construction phase. The Applicant acknowledges that highway authorities continue to consider future improvement schemes at the A63/A162 Monk Fryston roundabout. However, the assessment concludes that construction traffic associated with the Proposed Development would not result in significant traffic and transport effects. The Applicant also notes that the **outline Construction Traffic Management Plan (oCTMP) [updated alongside this submission]** includes alternative construction routing arrangements. Should the planned improvements at the A63/A162 Monk Fryston roundabout not be in place prior to commencement of relevant construction activities, alternative routes are identified within **ES Volume 2, Figure 14.4 Construction Routing [APP-113]**. The final CTMP will be approved by North Yorkshire Council as relevant planning authority, in consultation with the relevant highway authority, prior to construction and will include detailed controls relating to construction vehicle routing, delivery scheduling and traffic management measures where required.
REP1-014	WR-SMPC-08	South Milford Parish Council	Traffic and Movement	There was no indication that the Applicant intended to contribute to the required improvements or to fund any repairs to the road surfaces caused by the increase in abnormal loads on the minor rural roads.	The Applicant notes the comments regarding road improvements, road condition and responsibility for any damage attributable to construction traffic or abnormal load movements. The condition of the local highway network and the effects of construction traffic will be managed through the final Construction Traffic Management Plan (CTMP), which will be developed in consultation with and approved by North Yorkshire Council prior to construction. The **outline Construction Traffic Management Plan (oCTMP [updated alongside this submission]**) 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 North Yorkshire Council 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

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					Contractor to the satisfaction of North Yorkshire Council. Private access tracks used for construction access will be maintained and returned to a condition no worse than before Abnormal Indivisible Load movements are assessed separately within the **Transport Assessment [updated alongside this submission]** and would be subject to the established notification and approval processes with the relevant highway authorities. On this basis, the Applicant considers that appropriate mechanisms are available to manage road condition and ensure that construction traffic associated with the Proposed Development does not result in long-term deterioration of the local highway network.
REP1-014	WR-SMPC-09	South Milford Parish Council	Traffic and Movement	There are also delays with regards to reviewing routes for abnormal loads and NYC confirmed that they will not be in a position to conclude their review in time for Local Impact Report submission deadline on 11th August.	The Applicant notes the comments regarding the ongoing review of Abnormal Indivisible Load (AIL) routes by North Yorkshire Council. The Applicant can confirm that a Local Impact Report has been received from North Yorkshire Council REP1-006. An **Abnormal Load Report** has been prepared as part of the **Transport Assessment [updated alongside this submission]**, which identifies the anticipated AIL routes associated with the Proposed Development. AIL movements would be subject to the established notification and approval processes with the relevant highway authorities prior to movement. The Applicant continues to engage with North Yorkshire Council and other relevant stakeholders regarding AIL routing. The outcome of any ongoing review does not affect the conclusions of the **Environmental Statement Volume 1 Chapter 14: Traffic and Movement [updated alongside this submission]** or the **Transport Assessment [updated alongside this submission]**. Any AIL movements would be managed in accordance with the agreed approvals and requirements in place at the time of transport.
REP1-014	WR-SMPC-10	South Milford Parish Council	Traffic and Movement	We ask that the EA consider whether the Applicant's assessment of impact on traffic and transport, and proposed mitigating actions, are adequate given the current and well reported risks and traffic congestion in the area.	The Applicant notes the comments regarding the adequacy of the traffic and transport assessment and the proposed mitigation measures. The assessment includes future baseline traffic growth and committed development and therefore considers the Proposed Development in the context of forecast future traffic conditions, rather than in isolation. The Applicant considers that this provides a robust basis for assessing cumulative traffic conditions during the construction phase. The assessment concludes that construction traffic effects would not be significant. In addition, an outline **Construction Traffic Management Plan (oCTMP) [updated alongside this submission]** has been prepared and includes measures to manage construction traffic, including approved routing, delivery scheduling, traffic management measures and alternative routing arrangements where required.

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					Additionally, the final CTMP will be approved by North Yorkshire Council prior to construction and will provide the detailed framework for managing construction traffic throughout the construction phase. On this basis, the Applicant considers the assessment of the impact of traffic and transport, alongside the proposed mitigation, appropriate.
REP1-014	WR-SMPC-11	South Milford Parish Council	Traffic and Movement	Construction activity will cause damage to local rural roads and verges, and we seek assurance that NYC will not have to fund repairs. Can the EA please ensure that the liability for remediation remains with the Applicant.	The Applicant notes the concerns raised regarding potential road and verge damage resulting from construction traffic. An **outline Construction Traffic Management Plan (oCTMP) [updated alongside this submission]** has been prepared and sets out the framework for managing construction traffic. The condition of the local highway network and the effects of construction traffic will be managed through the final CTMP, which will be developed in consultation with and agreed by North Yorkshire Council prior to construction. This will include appropriate measures to monitor and manage the condition of affected roads during construction, including arrangements for addressing damage attributable to construction traffic where required. In addition, Section 3.18 of the oCTMP provides for pre-construction and post-construction road condition surveys to be undertaken on routes agreed with North Yorkshire Council. Where issues are identified that can be attributed to construction activities associated with the Proposed Development, these issues would be resolved by the Principal Contractor to the satisfaction of North Yorkshire Council. On this basis, the Applicant considers that appropriate mechanisms are available to manage road condition and ensure that construction traffic does not result in long-term deterioration of the local highway network.
REP1-014	WR-SMPC-12	South Milford Parish Council	Traffic and Movement	We also ask the EA to press NY Council for a thorough assessment of highways impact and alternative routes before any approval is considered.	The Applicant notes the comments regarding highway impact assessment and the consideration of alternative construction routes. The Applicant has engaged with North Yorkshire Council throughout the development of the transport strategy and traffic assessment. Alternative routing options have also been considered as part of the development of the construction traffic strategy and are reflected within the **outline Construction Traffic Management Plan (oCTMP) [updated alongside this submission]**, which includes alternative routing arrangements where appropriate. The final CTMP will be approved by North Yorkshire Council prior to construction and will provide the detailed framework for managing construction traffic, including approved routing, delivery scheduling and traffic management measures where required.

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REP1-014	WR-SMPC-13	South Milford Parish Council	Water Resources and Flood Risk	The EA were not satisfied with regards the flood data used and we welcome clarity of the Flood Zones 3a and 3b. We are concerned that certain sites are located on land with surface water flooding and this will require panels and other equipment to be lifted. If the Applicant plan any elevated installations, to avoid flooding areas, then the height limits on panels and buildings, and the subsequent visual impact would be of concern. We also ask the EA to consider whether the Applicant has adequately assessed the demand for the millions of litres of water required for each cleaning cycle of the solar panels, throughout the operational life of the development, and whether detailed assessment has taken place with Yorkshire Water and others, to ensure local residents will not be adversely affected during periods of peak demand. The Applicant cited APP204 in the Open Hearing response, but this shows only 0.27 litres per m2 of panel per clean cycle, yet other sources indicate 2-4 litres per m2 would be required. We also ask the EA to ensure that water requirements for BESS firefighting be considered as part of these assessments, along with managing the impact and recovery cost from contaminated water, post any fire incident. We ask the EA to confirm that the Applicant has thoroughly considered all forms of impact on the water environment, including drainage and flooding risks.	The **Flood Risk Assessment (FRA) [updated alongside this submission]** has been prepared using the most up-to-date and relevant flood risk information available at the time of assessment, including Environment Agency National Flood Risk Assessment 2 (NaFRA2) fluvial and surface water flood risk mapping, together with detailed site-specific hydraulic modelling developed for the Proposed Development. The assessment considers all relevant sources of flooding, including fluvial, surface water, groundwater, reservoir and artificial sources where applicable. The site-specific modelling provides a higher level of detail than national-scale mapping and has been used to refine the understanding of local flood risk where available. The **FRA [updated alongside this submission]** identifies Flood Zone 3b (functional floodplain) using the best available information available at the time of assessment, including Environment Agency datasets and consideration of the Planning Practice Guidance definition of functional floodplain. As no locally defined Flood Zone 3b mapping was available, a washland area south of Birkin Road was identified as functional floodplain and subsequently removed from the Order Limits through the iterative design process. No permanent above-ground development is proposed within Flood Zone 3b. The only infrastructure within the functional floodplain is a section of the underground cable corridor beneath the River Ouse and associated floodplain. As the cable is installed below ground, it will not reduce floodplain storage or impede flood flows. All other development within Flood Zone 3 is located within Flood Zone 3a. The Flood Risk Assessment **[updated alongside this submission]** will provide further clarification on this matter. Furthermore, the Proposed Development is classified as Essential Infrastructure. Essential Infrastructure is considered compatible with Flood Zones 3a and 3b, subject to the Exception Test being passed and the Proposed Development being designed to remain safe and operational during flood events, avoid any net loss of floodplain storage, not impede flood flows, and not increase flood risk elsewhere. The **FRA [updated alongside this submission]** demonstrates that these requirements can be achieved through the embedded design and mitigation measures incorporated within the Proposed Development. 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. Yorkshire Water have confirmed that they can supply the quantities estimated from the mains network across the development areas.

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					Runoff from the BESS, substation and other hardstanding areas will be managed by the implementation of a surface water drainage system. Runoff emanating from the BESS areas as a result of a fire would be effectively managed (**Outline Battery Safety Management Plan [updated alongside this submission**) to prevent the untreated discharge of contaminated firewater to surface or groundwaters. A drainage strategy will be in place at the operational phase, the outline Drainage Strategy is presented within **Appendix 15.4: Outline Drainage Strategy (ES Volume 3) [updated alongside this submission]**.
REP1-014	WR-SMPC-14	South Milford Parish Council	Landscape and Visual	We are concerned with regards to the cumulative impact on the landscape character of the area and we support the NYC concerns. The Applicant stated that landscape mitigation would largely be in the form of little 'transplant trees' that grow 1ft per annum, however, this would not resolve the visual impact and glare in the early years.	The Applicant has carried out a thorough and robust assessment of the likely cumulative landscape and visual effects in combination with other proposed developments of a similar scale and nature. This assessment is reported in Section 10. 14 of **ES Volume 1 Chapter 10 - Landscape and Visual [APP-048].** It has been assessed that the Proposed Development is likely to lead to some cumulative landscape and visual effects during construction, year 1 of operation and decommissioning stages. These effects represent the change to the landscape and visual experiences that would emerge during any change to the landscape, as recognised through NPS EN-1 which acknowledges in Section 5.10 that "*virtually all nationally significant energy infrastructure projects will impact the landscape'". It should be noted that with proposed mitigation in place and following initial establishment, landscape and visual impacts will generally reduce over time*." The Applicant has responded to North Yorkshire Council's submission of the Local Impact Report on matters of cumulative landscape and visual impacts, which specifically regard cumulative development ID67 (Hillam Solar Farm AP/2025/0037/REF). Regarding the adequacy of proposed planting as mitigation, the Applicant provided a detailed response to this matter at ISH1 and provided further information in **Written Summary of Applicant's Oral Submissions at ISH1 [REP1-004].** In summary, in line with best practice, the LVIA has assessed the worst-case effects at year 1 of operation in winter. It is common practice to assess residual effects at year 15 of operation in summer, by which time proposed planting will have fully established. In reality, there will be a gradual reduction in the magnitude of impact over the intervening years as those plants grow. The approach to mitigation follows well established principles and is consistent with consented solar farm NSIPs in similar landscape contexts where similar effects have been identified, such as Sunnica Energy Farm, Longfield Solar Farm and Gate Burton Energy Park. The delivery of the proposed landscape and visual mitigation and enhancement measures will be secured through the **Design Parameters and Commitments document [updated alongside this submission]** and **the Outline Landscape and Ecological Management Plan (oLEMP)**

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					[updated alongside this submission]. The oLEMP includes measures for implementing and managing advanced planting in section 4.2. The proposed locations for advanced planting specifically required to address potential glint and glare effects are shown in **ES Volume 2, Figure 16.1: Advanced Planting for Glint and Glare Mitigation [APP-141]**. Information regarding advanced planting for glint and glare impacts is set out in **Written Summary of Applicant's Oral Submissions at ISH1 [REP1-004].**
REP1-014	WR-SMPC-15	South Milford Parish Council	Landscape and Visual	The lack of adequate 'buffer zones' between solar panels and associated buildings and adjoining residences is a concern. Typical buffer zones for other developments have been over 100m, far in excess of the 30m proposed by the Applicant. The Applicant stated that in relation to the residential properties, the view of the landscape was of 'low value', which is completely incorrect. As such, they considered a 30m stand-off with some planting would be acceptable. The proposed buffer zones around the affected premises will have a significant impact on local residents and we consider the 30m buffer to be completely inadequate. There appears to be far greater protections for the wildlife than there is for the residents or business owners affected. We respectfully ask the EA to consider the adequacy of buffer zones or 'setbacks' proposed by the Applicant.	The Applicant notes the references to larger buffer zones of typically being above 100m from residential properties to solar farm development but cannot find evidence of this being secured for other consented solar farm DCOs. Where larger offsets are sometimes referred to, this is regarding equipment such as BESS and inverters. Applying blanket offsets of 250m would be contrary to paragraph 5.10.26 of NPS EN-1, which states that "*reducing the scale of a project can help to mitigate the visual and landscape effects of a proposed project. However, reducing the scale or otherwise amending the design of a proposed energy infrastructure project may result in a significant operational constraint and reduction in function – for example, electricity generation output*." The Applicant's position is that minimum offsets should be landscape-led. Notwithstanding this, paragraph 5.10.25 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 typically measured from residential properties, whereas the minimum 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.

Reference ID		Interested Party	Theme(s)	Comment	Applicant Response
REP1-014	WR-SMPC-16	South Milford Parish Council	Cumulative and In-Combination Effects	We have serious concerns about the cumulative impact of this proposal, when considered alongside other approved residential, commercial and energy developments in the area. In addition to the renewable energy projects, there is the expansion of the Sherburn Industrial Estate (Sherburn II and 42) and the Gascoigne Interchange development (adjacent to site 8); the Lumby Limestone Quarry and Selby Motorway Services, combined with the new residential developments planned for nine of the local villages (Sherburn-in-Elmet, South Milford, Hambleton, Thorpe Willoughby, Brayton, Barlby, Osgoodby, Wheldrake and Wistow), which will all impact on the same area. Are the Examining Authority confident that the Applicant has assessed the combined effects arising from multiple projects operating concurrently or sequentially, and can they show how this impact will be mitigated?	The Applicant acknowledges these concerns about cumulative impact. Information regarding cumulative effects can be found in **ES Volume 1, Chapter 17: Cumulative and In-Combination Effects [APP-055].** Table 17-12 provides the broad overall conclusions regarding cumulative effects for **ES Chapters 5 to 15 [updated alongside this submission].** In addition, through developing the ES, each topic chapter, where relevant, has included a cumulative impact assessment, considering other committed developments in the area and potential for cumulative impacts to aspects such as landscape and visual, and traffic. The cumulative assessment has taken into account nearby developments, including the Gascoigne Interchange Development (ID 92) and the proposed Limestone quarry on the A63 (ID 151), as well as residential developments at local villages throughout the cumulative assessment study area in **ES Volume 1, Chapter 17: Cumulative and In-Combination Effects [updated alongside this submission]** Table 17-11 and **on ES Volume 2, Figure 17.1: Locations of Short List Cumulative Schemes [APP-142])** that fall within the relevant zones of influence for each topic to evaluate potential cumulative effects. Chapter 17 sets out the approach to establishing the list of developments to be included in the cumulative assessment. The methodology and approach undertaken aligns with PINS advice including establishing an initial long list of developments and then reducing this to a short list based on specific thresholds. As outlined in section 17.6 of **Chapter 17 [updated alongside this submission]** a 10 km radius was used to create an initial long list for consideration within the cumulative impacts assessment based on the zone of influences identified within the ES chapters. Where it was appropriate for technical topics to consider National Significant Infrastructure Projects (NSIPs) within a larger spatial area, a 20 km radius was used (for Biodiversity and Ornithology). The short list of cumulative Proposed Developments is included in Table 17-11 **ES Volume 3, Appendix 17.1: Long List of Developments to Inform Cumulative Assessment [APP-189]** and shown visually on ES Volume 2, Figure 17.1: Locations of Short List Cumulative Schemes [APP-142], alongside a long list of 196 Proposed Developments, included in Table 2-1 of **ES Volume 3, Appendix 17.1 [APP-189].** The cumulative assessment concludes there will be significant adverse cumulative landscape effects on two landscape character areas and visual effects at seven viewpoints, and a locally significant loss of BMV land (not significant at a regional level). No other significant adverse cumulative effects were found.

Reference ID		Interested Party	Theme(s)	Comment	Applicant Response
REP1-014	WR-SMPC-17	South Milford Parish Council	Biodiversity and Ecology	Biodiversity and Ecology In relation to the impact on wildlife, there is a lack of data with regards to Wintering Birds (sites 6-8). This is important, as there are a number of internationally recognised, sensitive wildlife sanctuaries in the area, such as the Lower Derwent Valley National Nature Reserve (which is a Site of Specific Scientific Interest8 and a Ramsar9 site); Skipwith Common and Fairburn Ings RSPB Nature Reserve. As a consequence, we see thousands of visiting birds each year. There is a risk that large areas of solar panels may disturb 'migratory flightpaths' and create 'false lake' effects, resulting in death, injury and displacement amongst the visiting birdlife. Are the Examining Authority confident that the Applicant has fully assessed the impact on wildlife, particularly for migratory birds, and included satisfactory mitigation? How does the Applicant intend to monitor and measure the impact on the landscape, such as the increase in surface water. And finally, the impact on the local water supply. Are the Examining Authority confident that the Applicant has fully assessed the demand for water; to meet the essential requirements for cleaning the panels, dust suppression and BESS cooling. From where will the water supply be drawn and what impact will that have on our local communities, especially during periods of drought?	The Applicant notes the respondent's concerns. However, it is important to emphasise that potential effects on Fairburn Ings and Skipwith Common have been fully considered through both consultation and assessment. The Applicant has engaged with the RSPB and Yorkshire Wildlife Trust throughout the process, and a comprehensive record of consultation is provided in Table 12-1 of the **ES Volume 1, Chapter 12: Ornithology [as updated alongside this submission]**. The issues raised by these organisations have been taken into account in the assessment, and there is no evidence to indicate that Light Valley Solar will adversely affect these sites or the bird populations that rely upon them. Birds will continue to use, move between, and commute to and from these locations as part of their normal behaviour. In relation to the Lower Derwent Valley, likely significant effects are robustly assessed within the **Shadow Habitats Regulations Assessment (sHRA) [updated alongside this submission]**. Following consideration of the available evidence, Natural England agrees with the conclusion that the Proposed Development will not result in adverse effects on the integrity of the Lower Derwent Valley SPA and Ramsar site, either alone or in combination with other plans and projects. Furthermore, the habitat creation and management measures secured through the Proposed Development will provide enhanced habitat availability and strengthen ecological connectivity for wintering and migratory bird species within the wider landscape. With regard to the alleged "lake effect", the Applicant is not aware of any evidence demonstrating that solar developments in the UK result in significant impacts on bird populations through this mechanism. References to lake effect are generally derived from studies undertaken in extensive arid landscapes and are not directly comparable to the landscapes, habitats or solar developments found within the UK. Importantly, neither Natural England nor any other statutory or non-statutory consultee has identified lake effect as a concern in relation to the Proposed Development. As such, there is no evidence-based justification to conclude that this represents a likely significant effect. Surface water runoff arising from the Proposed Development will be managed in accordance with the **Outline Drainage Strategy [updated alongside this submission]**, including measures to retain the existing greenfield runoff response within the Solar PV areas and the provision of appropriate drainage and pollution controls for the BESS Compound and Substations. The **Outline Drainage Strategy [updated alongside this submission]** maintains that discharge rates to ordinary watercourses must be restricted to greenfield runoff rates for an ordinary watercourse, or between 1.0 – 1.4 l/s for IDB-controlled watercourses. The Drainage Strategy follows a drainage hierarchy based on Building Regulations Part H and national and local SuDS policies, the principle behind which is to mimic natural drainage patterns and provide attenuation such as to not increase runoff rates.

Reference ID		Interested Party	Theme(s)	Comment	Applicant Response
					A **Water Resources Assessment [updated alongside this submission]** has assessed the water demand for the Proposed Development, including but not limited to water required for solar module cleaning and BESS cooling during the operational phase, and dust suppression during the construction phase. At this stage the water supply for the development is not confirmed, however a new licensed abstraction is not considered to be needed as there are a number of reasonable alternatives available to provide water during construction. Water is expected to be either transported to the Site by road tankers from mains water, subject to agreement from Yorkshire Water, or from another water tanker supplier. Alternatives being considered are repurposing existing nearby licenced water abstractions or private water supplies, where viable; or surface water sourced and stored on site. Again it is assumed that water would be transported from the source to where it is needed using road tankers. Any abstractions from existing licensed surface water abstractions would be repurposed, and would require a temporary variation to the license granted by the Environment Agency. This would only be granted where there was no concern of environmental damage and would likely be restricted to recent actual abstraction. Water supply for the Proposed Development is considered in further detail in the **Water Resources Assessment [updated alongside this submission]**.
REP1-014	WR-SMPC-18	South Milford Parish Council	Traffic and Movement	A63 Selby Road / A162 Sherburn Bypass The area around Sherburn-in-Elmet has seen exponential growth over the past 10 years. Sherburn is now the largest industrial estate employer in North Yorkshire, employing over 3,000 people. As a result, the current volume of traffic around the A162 Sherburn Bypass and along the A63 Selby Road in both directions from the Monk Fryston roundabout is already considered by North Yorkshire Council to be an over-capacity road network. The approved expansion of the Industrial Estate (Sherburn II and 42) and the Gascoigne Interchange development (adjacent to site 8) will add a further 3,000 more daily car and Large Goods Vehicle (LGV) journeys onto the local road network - see Appendix (c). As such, NYC has recently proposed a reduced 40-mph speed limit on stretches of the A162 around Sherburn-in-Elmet (north and south of the main A162/B1222/Moor Lane roundabout), specifically citing safety concerns and the unsuitability of the previous 60-mph limit, given the level of commercial development and characteristics of the road. There are also several new residential developments planned for nine of the villages (Sherburn-in-Elmet, South Milford, Hambleton, Thorpe Willoughby, Brayton, Barlby, Osgoodby, Wheldrake and Wistow) and there are further commercial developments planned along the A63, between the A1M (Junction 42) and the Monk Fryston roundabout, namely the	The Applicant notes this comment. The application is supported by a **Transport Assessment [updated alongside this submission]**, which assesses the effects of construction traffic based on a robust worst-case scenario. This includes a Cumulative Effects assessment in Chapter 6. It is acknowledged that there are a high number of other nearby developments and Table 6-6 within the **Transport Assessment [updated alongside this submission]** shows that the Proposed Development would have minimal impact (1% to 2%) on the routes that are forecast to see a change in baseline traffic conditions due to the committed developments. Table 6-1 in the **Transport Assessment [updated alongside this submission]** outlines the increase from the baseline traffic flows associated specifically with the Proposed Development. It shows that the Bishopdyke Road (B1222) and the A162 at South Milford would both see a less than 1% increase in daily movements and a less than 3% increase in HGV composition during the construction phase of the Proposed Development. Changes of less than 10% can reasonably assumed to be within the expected range of daily fluctuation and would go unnoticed to the majority of other road users. That said, the Applicant has engaged with North Yorkshire Council (NYC) Highways regarding proposed improvements to the A63/A162 roundabout to assess the impact of the Proposed Development. NYC has advised that design work is underway to increase capacity at the junction to

Reference ID		Interested Party	Theme(s)	Comment	Applicant Response
				Yorkshire Green Energy Project, the Selby Motorway Services and the proposed Limestone Quarry at Lumby. As a result, we are facing an exponential increase in traffic on the A63 Selby Road in the next year, and currently there are no 'approved' proposals to improve traffic flow at the Monk Fryston roundabout. Are the Examining Authority confident that the Applicant has assessed the combined effects arising from multiple projects operating concurrently or sequentially, and have sufficient plans to mitigate the impact of this proposal?	accommodate a range of committed developments within the surrounding area, with the improvements anticipated to be completed by 2028. There is therefore a commitment in Section 3.7 of the **outline Construction Traffic Management Plan (oCTMP) [updated alongside this submission]** to consider the construction phasing of all the committed developments when updating the CTMP to ensure that the construction routing of traffic associated with the Proposed Development would not have an unacceptable cumulative effect on local traffic conditions. In addition, any temporary construction-related effects will be managed through the measures set out in the **outline Construction Traffic Management Plan (oCTMP) [updated alongside this submission]** which includes timing restrictions on construction deliveries to avoid the morning and evening highway peak periods. It is therefore concluded that the change in traffic flows associated with this Proposed Development can be effectively managed through the measures in the **outline Construction Traffic Management Plan (oCTMP) [updated alongside this submission].**
REP1-014	WR-SMPC-19	South Milford Parish Council	Battery Safety	We are extremely concerned as to the safety risks associated with the Battery Energy Storage System (BESS) planned for Monk Fryston. The Fire Service guidance states that responding to a BESS incident would require clear, permanent access for Fire Appliances to approach from multiple directions and to manoeuvre safely. The volume of traffic on the A63 would severely impede the emergency services, when responding to any incident at the Monk Fryston BESS. Are the Examining Authority confident that the Applicant can mitigate and manage the risks associated with the BESS?	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 4.2 of the oBSMP cover NYFRS site access requirements and BESS Compound access fully conforms to NFCC guidance and is agreed with 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. 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

Reference ID		Interested Party	Theme(s)	Comment	Applicant Response
					swept path analysis for emergency vehicles has been undertaken, and the roads have been confirmed as suitable for emergency vehicle access. The Applicant's OBSMP has been drafted to clearly 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 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). 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 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. The implementation of the oBSMP is secured through a Requirement in Schedule 2 of the **Draft DCO** [**updated alongside this submission**]. A detailed BSMP and ERPs will be developed by the Applicant in consultation with the NYFRS and the Environment Agency, these plans must be approved by North Yorkshire Council prior to construction of the BESS starting. The Detailed BSMP will be substantially in accordance with the oBSMP.
REP1-014	WR-SMPC-20	South Milford Parish Council	Traffic and Movement	Common Lane, South Milford The proposed access route to sites 6 and 7 will be via the junction of A162 Sherburn Bypass with Common Lane, South Milford. This junction represents a risk due to its geometry and reduced visibility, with congestion already occurring during peak travel periods. Construction traffic travelling from the A63 will have to turn right, across oncoming traffic in order to use the proposed access route. This junction is also used by all pedestrians crossing this busy road to access the Common Lane Public Rights of Way. Members of the public already take	The Applicant notes this comment and acknowledges that, given the rural nature of the area, a number of the proposed construction routes, including Common Lane, are narrow in places. The Applicant also recognises that Common Lane is used by a range of road users, including pedestrians, cyclists and other non-motorised users. The **Transport Assessment [updated alongside this submission]** has assessed the effects of construction traffic on the local highway network, including Common Lane, and concludes that any impacts can be appropriately managed through the measures set out in the **outline Construction Traffic Management Plan (oCTMP) [updated alongside this submission].** These measures include controls on construction traffic

Reference ID		Interested Party	Theme(s)	Comment	Applicant Response
				their lives in their hands when crossing at this point – this is an accident waiting to happen. Common Lane is a constrained single-track, rural road with limited width, restricted opportunities for vehicles to pass, with intermittent ditches on both sides of the road, soft and vulnerable verges, sharp bends, blind bridges and no formal provision or footpaths for pedestrians, cyclists or horse riders. Although Common Lane is subject to a 60-mph speed limit, a section of this road connects two Public Rights of Way (PRoW) and is regularly used by vulnerable road users. Are the Examining Authority confident that the Applicant has fully assessed the impact on Common Lane; can manage the associated congestion around the site access route and mitigate the risks to vulnerable road users?	routing, restrictions on the timing of vehicle movements and the implementation of traffic management measures, where required, to minimise interactions with local users and maintain safe conditions. In addition, provision has been made within the Order Limits for a number of Highway Improvement Areas where passing places may be required. The final location and design of any such passing places will be determined by the appointed contractor and agreed with the Local Highway Authority through the detailed CTMP approval process. These Highway Improvement Areas, including those on Common Lane, are shown on ES Volume 2, **Figure 1.2: Elements of the Proposed Development [APP-058].** Together, these measures to manage traffic and advise users of the presence of construction traffic will help ensure the safe operation of the highway network during construction and mitigate potential effects on vulnerable road users and other users of Common Lane.
REP1-014	WR-SMPC-21	South Milford Parish Council	Public Rights of Way	Public Rights of Way (PRoW) South Milford has a limited number of Public Rights of Way. As a result, Common Lane is the only safe pedestrian walking route, popular with ramblers, connecting South Milford to Monk Fryston. Following recent plans to divert another PRoW along Common Lane as part of the new Gascoigne Interchange development, the safety reports carried out as part of the Stopping Up Order stated that, the closure of the PRoW would increase the footfall on Common Lane and recommended a reduction of the speed limit to 30-mph. It is apparent that the Applicant is working from old data and is not aware that several of the level crossings adjacent to site 8 have been closed and pathways diverted. They have not taken account of the diversions and the resulting increase in footfall along this rural road. If the proposal was to be approved, this would further limit the local foot access routes between the villages, contrary to local policy. Are the Examining Authority confident that the Applicant has fully assessed the impact of increased traffic in this area and are there suitable plans to manage the congestion and mitigate the risks to vulnerable road users?	The Applicant notes these concerns. The assessment of Public Rights of Way, recreational access and community receptors is presented 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 the embedded mitigation and management measures proposed, no significant residual effects on Public Rights of Way or recreational access receptors are anticipated. The Applicant recognises the importance of Common Lane and other local routes for pedestrians and recreational users. The Proposed Development includes measures to maintain access wherever practicable, minimise disruption during construction and provide alternative routes where required. In addition, the Proposed Development would deliver new permissive paths and enhancements to the wider access network, providing additional recreational opportunities and connectivity for users. It is acknowledged that recent changes and other nearby developments, such as the Gascoigne Wood development, is expected to generate more walking and cycling trips on Common Lane which is an existing popular recreational route, but it is not considered that this would affect the efficacy of the measures that the Applicant has proposed.The management of construction traffic and its interaction with vulnerable road users is addressed through the **outline Construction Traffic Management Plan (oCTMP) [updated alongside this submission] and the oPRoWMP [APP-199]**. These documents include measures such as traffic routing controls, advance notification of activities, signage, banksmen at crossing points where appropriate, and management of construction vehicle movements to reduce conflicts with Public Rights of Way users. The

Reference ID		Interested Party	Theme(s)	Comment	Applicant Response
					oPRoWMP also sets out measures to manage Public Rights of Way where construction activities are taking place in their vicinity. The Applicant will continue to engage with the relevant highway authorities and other stakeholders regarding the detailed implementation of traffic management and Public Rights of Way measures. Any updates to the local access network that are relevant to the detailed management of Public Rights of Way and construction activities will be taken into account through the development and implementation of the final management plans secured through the Proposed Development.
REP1-014	WR-SMPC-22	South Milford Parish Council	Cumulative and In-Combination Effects	Appendix (a) and (b) includes a list and table supplied by South Milford Parish Council listing developments within a 15 mile radius of Light Valley Solar.	All of the developments noted in Appendix (a) have been included in the cumulative assessment in **ES Vol 1, Chapter 17 Cumulative and In-combination effects** where the applications are still valid. With regard to cumulative impact assessment, biodiversity and ornithology included a search area of 20km but only for DCO applications – which are those stated in Appendix A of the respondent's Written Representation. See response to WR-SMPC-16 above in relation to this. For all other topics the search area is 10km which relates to an equivalent of 6.2 Miles. With regard to Appendix B – all projects within the 10km/6.2 mile radius have been included in the cumulative assessment where the development meets the search criteria as set out in Section 17.6 of **ES Chapter 17 Cumulative and in-combination effects**.
REP1-014	WR-SMPC-23	South Milford Parish Council	Traffic and Movement	Appendix (c) includes a list of projects supplied by South Milford Parish Council regarding cumulative traffic impacts.	The Applicant notes this comment. The **Transport Assessment [updated alongside this submission]** has been undertaken using an appropriate future baseline that takes into account committed development and forecast background traffic growth, developed in engagement with NYC, thereby ensuring that the potential for cumulative effects is considered within the assessment. With the **Transport Assessment [updated alongside this submission] the A162 at South Milford is forecast to have 3,283 additional daily movements in the cumulative scenario which is more than the numbers put forward by South Milford.**

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

Reference ID	Tracker Code	Interested Party	Theme(s)	Comment	Applicant Response
British Horse Society					
REP1-028	WR-BHS-01	British Horse Society	The Proposed Development	The BHS objects to this application on the grounds that the application does not meet the tests of NPPF Paragraph 105.	As per the Applicant's response to the British Horse Society in **The Applicants Response to Relevant Reps - Part 1 [PDB-005],** the Proposed Development is consistent with national planning policy, including Paragraph 105 in the NPPF, as evidenced In the **Planning Statement [updated alongside this submission] and Policy Compliance Document [updated alongside this submission]**. The Proposed Development would provide new permissive paths, retained access for horse riders where appropriate, route offsets and Public Rights of Way (PRoW) management measures, resulting in no significant impacts on PRoW or horse riders and providing enhanced recreational connectivity within the local area.
REP1-028	WR-BHS-02	British Horse Society	Socioeconomics	The BHS objects on the grounds that equestrians are being marginalised in the scheme with walkers and cyclists being favoured. Throughout this scheme equestrians are excluded, the arguments for inclusivity of walkers and cyclists can be extended to equestrians using the mechanism of the Equality Duty. This is a form of discrimination, and the Equality Act 2010 created a Public Sector Equality Duty for authorities to provide equal opportunities for all, which means that an authority needs a cogent reason for excluding equestrians.	The Applicant acknowledges the concerns raised regarding equestrian access. The Proposed Development has considered the needs of a range of recreational users, including horse riders, within the design and assessment process. The **outline Public Rights of Way Management Plan (oPRoWMP) [APP-199]** includes provisions relating to horse riding, alongside walking and cycling, and sets out measures to manage access during construction and operation. In addition, the Proposed Development includes new permissive paths, several of which are intended to be available for equestrian use. Where new permissive paths have been identified as works 10.A or 10.B, which does not allow for equestrian access, this is in line with current user accessibility, so is not removing a previously accessible PRoW for equestrians. The Applicant has also undertaken an Equality Impact Assessment which considers the potential effects of the Proposed Development on different groups and identifies mitigation where appropriate. The Applicant does not consider that the Proposed Development excludes equestrians from access opportunities, noting that equestrian use has been considered through the design of the access network, the assessment process and the management measures secured through the **outline Public Rights of Way Management Plan (oPRoWMP) [APP-199]**.
REP1-028	WR-BHS-03	British Horse Society	Socioeconomics	There are a number of Definitive Map Modification Orders (applications can be found on the relevant authorities registers) which have been submitted by BHS members, these routes must be protected and not subsumed within the scheme. We note that some of our objection points have been addressed such as differentiating between rights of way bridleways and footpaths now shown separately within the Public Rights of way documents, we welcome this, along with acknowledging the DMMOs currently held by North Yorkshire Council	The Applicant notes these comments and welcomes the respondent's acknowledgement of the amendments made to the Public Rights of Way documentation. The **outline Public Rights of Way Management Plan (oPRoWMP) [APP-199]** identifies current Definitive Map Modification Order (DMMO) applications relevant to the Proposed Development and considers their status within the assessment and management of the Public Rights of Way network. As set out within the **outline Public Rights of Way Management Plan (oPRoWMP) [APP-199]**, existing Public Rights of Way and known DMMO

					applications have been taken into account in developing the Proposed Development. Where DMMO applications are confirmed and become Public Rights of Way, they will be considered and managed through the relevant statutory processes. Any additional proposed modifications to the Public Rights of Way network would also be subject to the appropriate legal procedures and approvals.
REP1-028	WR-BHS-04	British Horse Society	Socioeconomics	Permissive paths should be multi-user and made available for all NMU users not just walkers and cyclists. It should be noted that cyclists can legally use bridleways. It therefore makes more sense that these permissive paths be multi-user.	The Applicant notes this comment. The design of the permissive path network has sought to provide enhanced recreational opportunities for a range of users, including walkers, cyclists and, where appropriate, equestrians. Details of the proposed permissive paths, including their intended users, are set out within the **outline Public Rights of Way Management Plan (oPRoWMP) [APP-199].** Existing Public Rights of Way, including bridleways, have also been considered as part of the design and assessment process. The Applicant notes that the suitability of individual permissive paths for different user groups depends on a range of factors, including route location, connectivity, safety, land management considerations and interactions with other users. The proposed access strategy has therefore been developed on a route-by-route basis to ensure that each path is appropriate for its intended use.
REP1-028	WR-BHS-05	British Horse Society	Socioeconomics	The distances of Permissive paths within the scheme are shown as a mere 8km which does not seem appropriate for a scheme of this size. We would like to see the distances available to each user group broken down by length. IE permissive path length available to Pedestrians separated from both cyclists and horse riders.	The distances for permissive paths within each user group are as follows[1]: - Pedestrians: 11,509m - Cyclists: 10,190m - Equestrians: 8,009m As noted in the response to WR-BHS-04 above, a range of factors, including route location, connectivity, safety, land management considerations and interactions with other users has informed the use of each path on a route-by-route basis. Exact detail for the location and length of the permissive paths can be seen in Figure 3 – Public Rights of Way and Permissive Paths Enhancements and Diversions, within the **outline Public Rights of Way Management Plan (oPRoWMP) [APP-199].**
REP1-028	WR-BHS-06	British Horse Society	Consultation and Engagement	Dialogue has been very disappointing up to this point with no response from the applicant to either our initial comments or our objection submitted 4th July 2025.	The Applicant can confirm it has responded to feedback submissions from the British Horse Society. All feedback submitted by the British Horse Society at the statutory (Phase Two) consultation and the subsequent Targeted Consultation has been responded to within **Consultation Report Appendix 11: Section 47 Applicant Response Table [APP-036]**. The Relevant Representation submitted by the British Horse Society has been responded to within **The Applicant's Response to Relevant Representations Part 1 [PDA-014]**.

[1] These detailed numbers differ from the general figure of 8km cited in the **oPRoWMP [APP 199]** which reflects the length of Permissive Paths available to all users. The total available length of Permissive Paths available specifically for Pedestrians and Cyclists are higher.

					The Applicant notes that it does not respond to individual pieces of feedback submitted during statutory consultations, instead formally responding to all feedback as part of the Consultation Report and its appended Applicant Response Tables. This is standard practice and has previously been communicated through project updates and newsletters published during the pre-Application phase. Relevant Representations are processed by PINS and the Applicant doesn't receive individual submissions until all are published by PINS. The Applicant is required to respond to points raised in Relevant Representations and has done so through the aforementioned Response to Relevant Representations documents **[PDA-014 and AS-036]**.
Keir Mather MP					
REP1-041	WR-KM-01	Keir Mather MP	The Proposed Development	From the outset of this process, I have been clear that I cannot support a project of this scale, in its current form. From the evidence submitted in the first set of Examination Hearings, I remain unconvinced that the evidence from the applicant has adequately addressed the concerns repeatedly raised by residents, Parish Councils and affected landowners.	The Applicant notes this comment.
REP1-041	WR-KM-02	Keir Mather MP	The Proposed Development	As many constituents emphasised, we want to see rollout of renewable energy so we can lead in tackling the climate crisis, but this must be done in a way that is fair, equitable and takes residents with them.	The Applicant notes and welcomes the support emphasised by many constituents for the rollout of renewable energy. The **Statement of Need [APP-214]** sets out the contribution the Proposed Development will make to supporting the government's aim to ensure the supply of energy to the national energy system always remains secure, reliable, affordable, and consistent with meeting legally binding GHG emissions on the way to net zero by 2050. The planning balance set out in the **Planning Statement [APP-207]** considers all of the benefits as well as the adverse effects associated with the Proposed Development. As set out in NPS EN -1, there is a presumption in favour of Critical National Priority Infrastructure projects in the planning balance, where specific requirements are met. There are no residual impacts that present an unacceptable risk to, or unacceptable interference with, human health and public safety, defence, irreplaceable habitats or onshore flood risk remain after application of the mitigation hierarchy.
REP1-041	WR-KM-03	Keir Mather MP	Landscape and Visual	Throughout the hearings, the Examination Authority heard the profound impacts that the scheme would have on the daily lives of those living closest to the development. Constituents described feeling as through they would be enveloped by the infrastructure associated with this project, with one constituent explaining that their home would be surrounded by solar panels. Others described the proposal as amounting to the industrialisation of the Selby District's natural landscape.	The Applicant acknowledges that the Proposed Development would introduce changes to the character of parts of the landscape and that some local people have strong feelings or concerns about this. However, the LVIA presented in **ES Volume 1 Chapter 10 - Landscape and Visual [APP-048]** concludes that, with embedded and additional mitigation, the resulting effects would be localised, reversible and would reduce over time. This approach is consistent with paragraph 5.10.5 of the Overarching National Policy Statement for Energy (NPS EN 1), which recognises that "*virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape*," while also acknowledging that beneficial landscape character effects may arise through mitigation. 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. 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. 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 "*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*." 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 Applicant has considered the proximity of the Proposed Development to settlements and people's homes from the outset. As set out in paragraph 3.5.5 of **ES Volume 1, Chapter 3: Alternatives and Design Iteration [updated alongside this submission]** and enshrined in Site Specific Design Principle 6 set out in the **Design Approach Document [APP-216]**, 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, it is an established planning principle that views from residential properties are a matter of private amenity. Regarding the offsets from residential properties, the Applicant explained the rationale for the minimum 30m offset from measured from the curtilage has been defined as part of the landscape-led approach to the design of the Proposed Development. This has considered the generally flat topography and effectiveness of planting close to boundaries in mitigating significant effects. This is demonstrated through the LVIA, with the exception of one residential visual receptor associated with VP11 at Siddle Farm House, where moderate adverse significant effects would persist at year 15 of operation. This must be considered in the context of NPS EN-1 paragraph 5.10.13, which states that *"all proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites*". 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 as this would result in a significant operational constraint and reduction in electricity generation output, contrary to paragraph 5.10.26 of NPS EN-1.
REP1-041	WR-KM-04	Keir Mather MP	Cumulative and In-Combination Effects	I remain particularly concerned about the cumulative impacts of this project. Landscape change, construction activity resulting in traffic and noise, lighting and ecology cannot be considered in isolation when residents will experience them simultaneously. Across the remaining examination period, I urge the Examining Authority to continue to scrutinise whether the cumulative impacts of the scheme have been effectively assessed and mitigated by the applicant.	Information regarding cumulative effects can be found in **ES Volume 1, Chapter 17: Cumulative and In-Combination Effects [updated alongside this submission]**. Through developing the ES, each topic chapter, where relevant, has included a cumulative impact assessment, considering other committed developments in the area and potential added impacts to aspects such as traffic. The topic-specific conclusions are summarised in each relevant topic chapter of the ES and in Table 17-12 of **ES Volume 1, Chapter 17: Cumulative and In-Combination Effects [updated alongside this submission]**. The cumulative assessment has taken into account nearby developments, including other solar projects, that fall within the relevant zones of influence for each topic to evaluate potential combined effects. Many of these developments are located within North Yorkshire, with some in nearby administrative areas due to the proximity of the Proposed Development to other administrative areas. Across the ES, limited cumulative impacts have been identified in the operational phase, and where they have been identified, it is not possible for the Proposed Development to mitigate those impacts. To support the ES the Applicant produced a short list of cumulative Proposed Developments, included in Table 17-11 of **ES Volume 1, Chapter 17: Cumulative and In-Combination Effects [updated alongside this submission]**, and shown visually on **ES Volume 2, Figure 17.1: Locations of Short List Cumulative Schemes [APP-142]**. Figure 17.1 names ten nearby Nationally Significant Infrastructure Projects within the study area of the cumulative assessment and includes a number of Solar Farms; but also includes the locations of other smaller cumulative developments that also includes a number of solar farms. See Table 17-11 for additional solar farms which can then be cross checked against the numbering on Figure 17.1 to locate these. A long list of 196 developments, is included in Table 2-1 of **ES Volume 3, Appendix 17.1: Long List of Developments to Inform Cumulative Assessment [APP-189]**. The approach to establishing the list of developments to be included in the cumulative assessment is set out in Chapter 17 and aligns with PINS advice. **ES Volume 1, Chapter 17: Cumulative and In-Combination Effects [updated alongside this submission]** includes an assessment in in-combination effects where receptors experience more than one type of effect as a result of the Proposed Development.

REP1-041	WR-KM-05	Keir Mather MP	Lands / Compulsory Acquisition	Throughout the Compulsory Acquisition hearings, it was demonstrated that the applicant had failed to adequately justify the amount of land they wished to acquire, including for areas with wider cable corridors.	As set out in the **Statement of Reasons** and in its **Written Summary of Oral Submissions at CAH1,** and its other submissions at Deadline 2, the Applicant has justified the amount of land it wishes to acquire, which will enable the Proposed Development to be built.
REP1-041	WR-KM-06	Keir Mather MP	Socioeconomics	I would like to see individual assessments of private losses assessed by the applicant, rather than a reliance on general compensation guidelines.	The Applicant notes this comment. Please see the Applicant's submissions on this point in its **Written Summary of Oral Submissions at CAH1 [REP1-004].** The Environmental Statement assesses the likely significant effects of the Proposed Development on environmental and socio-economic receptors using established EIA methodologies. The assessment is undertaken at an appropriate scale for the purposes of the EIA and therefore does not provide individual assessments of private financial losses or compensation entitlement for specific properties or persons. Where potential effects on specific receptor types, businesses, community facilities, Public Rights of Way or other socio-economic receptors have been identified, these have been assessed within **ES Volume 1, Chapter 13: Socioeconomics [updated alongside this submission]**. Where significant effects have been identified, mitigation measures have been proposed and the residual effects assessed. Any entitlement to compensation arising from the Proposed Development would be considered through the relevant statutory compensation processes and assessed on a case-by-case basis in accordance with the applicable legislation. As set out in the **Book of Reference [updated alongside this submission**], any claims submitted would be reviewed and assessed in accordance with the relevant legislative framework for those persons who are negatively affected by the scheme.
Sherburn Aeroclub					
REP1-029	WR-SAC-01	Sherburn Aeroclub	The Proposed Development – Aviation Safeguarding	Owing to the scale and proximity of the scheme to Sherburn Aerodrome, it is likely that it could adversely impact upon the established aviation operation, if adequate consideration is not afforded at this point and any required mitigation measures are not employed. We have not included low level, fixed wing training circuits or rotary wing circuit tracks in the above figures, these should be assessed however, to understand and quantify potential impact to the aerodrome and its operators. Development sites 2,6,7 and 8, all sit within the Sherburn Aerodrome, aerodrome traffic Zone (ATZ) as shown below in figure 4 ATZ and development sites. Development site 4 also encroaches into the ATZ at the southern extent of the zone.	The Applicant is in detailed discussion with Sherburn Aero Club on the nature and scale of any impacts and any required mitigation measures. The Applicant's assessment is that any impacts on the operations of Sherburn Aero Club are not significant and can be managed using the range of normal procedures and techniques for an aerodrome of this type.

REP1-029	WR-SAC-02	Sherburn Aeroclub	Consultation with Sherburn Aerodrome / Statement of Common Ground	At present, no such consultation has taken place with the aerodrome authority. Whilst we recognise the value and intent behind such a process, it is crucial all parties understand the concerns of the aeroclub to support further discussions around the scheme's optimisation and mitigation of hazards. It shall be crucial to ensure these points are included and addressed, as part of the development of a statement of common ground.	The Applicant is in detailed discussion with Sherburn Aero Club on the nature and scale of any impacts and any required mitigation measures and will continue to engage with the Aero Club in order to progress the drafting of the Statement of Common Ground.
REP1-029	WR-SAC-03	Sherburn Aeroclub	Glint and Glare	We note that Pagerpower's methodology encompasses the assessment of a 50° field of view, either side of the approach bearing. This is problematic and perhaps symptomatic of a lack of general aviation specific guidance on this subject. In summary, the 50° field of view is inadequate in the assessment of glint and glare on aviation receptors at busy general aviation aerodromes. We suggest that with further optimisation, taking in to account a wider pilot field of vision, additional circuit tracks associated with low level training and rotary wing operations, that a greater level of yellow glare will be indicated. It shall be important to adequately understand the potential extent of glare in order to aid mitigation and to support final development site design concepts. As part of the examination process, we recommend that the gaps described above in relation to glint and glare are reassessed to ensure general aviation specific flight profiles are adequately understood and modelled. Whilst it is highly likely that such a process will indicate more yellow glare, it will help to shape consideration of tracking and fixed panels as well as the potential benefit of anti-reflective coatings.	The Applicant is in detailed discussion with Sherburn Aero Club on the nature and scale of any impacts and any required mitigation measures. It is the Applicant's position, based on experience at similar aerodromes around the UK, that computer-modelled predictions of adverse glint and glare effects on pilots do not occur in practice. The Applicant has modelled circuit receptors for Sherburn-In-Elmet Airfield which are based upon the published circuit procedures at the aerodrome. These receptors have also been used in the past for other projects in the vicinity of Sherburn-In-Elmet Airfield. The Applicant holds that the 50 degree primary field of view for pilots is appropriate for the assessment of impacts towards pilots, however notes that for this assessment all of the circuit receptors have been modelled without consideration of a field of view (and therefore include glare from any angle). It is only in subsequent analysis of the modelling results that consideration has been made of a pilot's field of view, in line with the relevant FAA 2013 aviation guidance which is utilised across the industry.
REP1-029	WR-SAC-04	Sherburn Aeroclub	The Proposed Development – Aviation Emergency and Development Design	Careful consideration should be given to the possibility of an aircraft accident occurring within any of the proposed development sites. At present, there are many wide-open spaces in which a pilot could make an off aerodrome forced landing if they were compelled to do so. It is observable that the development sites will reduce such options. The reality is that whilst the suggestion of such a gap has clearly been made with good intention, it offers extremely limited value and is highly problematic for a variety of reasons.	The Applicant is in detailed discussion with Sherburn Aero Club on the nature and scale of any impacts and any required mitigation measures. Following discussions with the Aero Club, the Applicant has submitted to the Aero Club for their consideration and to inform discussions with them, analysis of the forced landing options for aircraft on departure from the most-used runway – 24 – showing that the Proposed Development would not significantly constrain forced landing options. It also shows that most of the fields currently available for forced landings off that runway are less than 350 metres in length. This is typical of the forced landing options situation for many aerodromes in the UK due to field sizes and other constraints.

				The proposed gap sits in a narrow field within development site 6. The length of the proposed strip is less than 350 meters which is noticeably short indeed. Furthermore, its width is understandably limited. Crucially, such a strip could only ever conceivably represent an option to aircraft on the least used runway 01/19 which is only used when particularly strong northerly or southerly winds are present. This means that an aircraft would require to climb clear of the earth mounds and then aggressively descend to the short landing site provided by the EFATO gap whilst experiencing an engine failure. In summary, this does not represent a workable solution for an aircraft in such an emergency.	In relation to the designated forced landing strip off runway 19, if use of this field in an emergency is currently impractical due to having to "*aggressively descend*", this would mean that this field is not currently usable for emergency landings and any aircraft suffering an engine failure would require to use the fields to the south. These are not part of the Proposed Development and would continue to be available for emergency use after the construction of the Scheme.
REP1-029	WR-SAC-05	Sherburn Aeroclub	The Proposed Development – Aviation Emergency and Development Design	Even with an ideal chain of events during an emergency scenario, the pilot may not be able to direct the aircraft towards the gap as flying energy (height and speed) deteriorates, which could result in the aircraft coming in to contact with photovoltaic infrastructure. Such a scenario would greatly reduce survivability and create additional and dynamic rescue and firefighting hazards to first responders. On emergency access, we recommend further assessment of the extent and design of development sites, particularly those in areas we describe as potential hotspots where aircraft are low and slow in the circuit pattern. If an aircraft was forced to make an off aerodrome landing in these locations, options are limited and could result in an aircraft not being able to avoid the panels directly beneath their flight track.	The Applicant is in detailed discussion with Sherburn Aero Club on the nature and scale of any impacts, including forced landing options, and any required mitigation measures. On emergency access, the Applicant will provide arrangements for Sherburn Aerodrome fire and rescue service, or North Yorkshire Fire & Rescue Service on their behalf, to gain access to the Site in the event of an aircraft incident.

REP1-029	WR-SAC-06	Sherburn Aeroclub	Thermal Radiation / Aviation	Owing to the scale and positioning of the development areas, it is possible that heat absorbed by the photovoltaic panels will radiate upwards causing localised thermal instability. Such instability is problematic for pilots, particularly for those at low height and airspeed, with low flying hours or those under flight training. Unwanted lift or sink caused as a result of such instability can cause an aircraft to gain or lose height, cause unintended changes in aircraft attitude relative to the horizon and cause flight control issues in both pitch and roll axis. Light aircraft, such as those in operation at Sherburn aerodrome are most susceptible. Whilst navigational aid performance is not a concern at Sherburn, the proximity of the development sites and potential for thermal energy to upset aircraft attitude is observable, particularly given the flight training environment. Work is required to assess and quantify any such risk to provide comfort and reassurance to all associated stakeholders. On thermal radiation, whilst this phenomenon has not been assessed as part of the process, we recommend that work is undertaken to quantify such hazards given the busy nature of the flying environment at Sherburn Aerodrome and constant overflight of the development areas. It is likely that revision of the extent of the development as described above could help to reduce this issue.	It is the Applicant's position that thermal turbulence from solar panels on or close to airfields has not been shown to cause a problem for light aircraft. Further, the environment around aerodromes used by light aircraft routinely contains sources of turbulence to aircraft on arrival/departure, such as buildings, trees, terrain and heat-generating sources such as car parks and metallic roofs. These are routinely accepted as part of the normal operating environment of aerodromes. The effect of thermal turbulence from solar panels upon aviation activity has been considered for other solar DCOs and the evidence suggests that typically the degree of thermal turbulence is minor and below relevant safeguarding thresholds. Thermal turbulence was modelled for Botley West Solar Farm, a proposed 840MW solar farm near Oxford Airport, and the turbulence modelling suggested that the maximum increase in air temperature would be 1.1°C and thermal turbulence could increase time exceedance of the threshold commonly applied to building induced turbulence by 1.1% over the course of a year. The report concludes that "it is expected that the impact of the proposed solar farm will be minor and thus may not be considered significant."
REP1-029	WR-SAC-07	Sherburn Aeroclub	EMF / Aviation	Electromagnetic interference is known to have caused communications issues when large solar arrays are located in proximity to aerodromes. Examples in the US, the Netherlands and Sweden include reports of increased 'noise' on air traffic radio telephony frequencies. Owing to the scale of the proposed scheme, and proximity to Sherburn aerodrome, it shall be necessary to ensure no such adverse effects are created, and that proper assessment and mitigation measures are employed where required. Finally, we recommend assessment for the potential of electromagnetic interference given the proposed scale of the scheme and proximity to Sherburn aerodrome.	Sherburn-In-Elmet Aerodrome has one Non-Directional Beacon (NDB) located on the airfield which is used to assist pilots in navigating to the airfield and also operates a ground to air radio. The Applicant is aware of a study which indicates that the effect of electromagnetic interference from solar PV upon communications frequencies would be limited to where solar PVs are within a very small distance of the radio station (<10m). The solar panel areas for Light Valley Solar are significantly beyond this range and as such no significant impact is expected.

Appendix A: Light Valley Solar – Farming Report

1 Introduction

1.1 Purpose of the report

Light Valley Solar (the Proposed Development) comprises seven Solar Development Sites and an associated cable route corridor. Almost all of the land within the Solar Development Sites is in agricultural use. Whilst the land and soil will mostly remain in-situ for the duration of the lifetime of the Proposed Development, the primary agricultural land use will cease on commencement of construction.

An Agricultural Land Classification (ALC) survey has been undertaken across the Solar Development Sites and the land has been graded in accordance with the established ALC guidelines (Ref 1). The temporary but long-term loss to agricultural land quality is therefore known, however, the ALC grade does not directly determine the land use or productivity.

The purpose of this report is to establish the actual losses to agricultural production should the Proposed Development proceed.

The assessment has been informed by information and crop records obtained directly from the landowners, as well as national farming statistics published by Defra. Where actual crop yields are known, they have been used in calculations of the land's contribution to national crop yields for that year. Where only the crop type is known, the three-year-average (2022 to 2024) yields from Defra have been used in calculations and are assumed to be representative of the land's capability accounting for variable challenges such as weather patterns that may lead to unusually large or small yields in one year.

2 Solar Development Sites

2.1 Solar Development Site 1

2.1.1 Solar Development Site 1 includes 331.5 hectares (ha) of agricultural land.

Approximately 88 ha in the west of Solar Development Site 1 is farmed under the Sustainable Farming Incentive (SFI). The crops grown on the eight applicable fields will not typically be harvested for consumption but will primarily function for environmental benefit such as providing winter soil cover. The option of SFI enables farmers to continue to productively manage land that has practical constraints to farming, without relying on unachievable yields for profitability.

Within the area of SFI, the ALC survey classified roughly one-third as Best and Most Versatile (BMV) quality in Subgrade 3a, and roughly two-thirds as non-BMV Subgrade 3b. This highlights how the ALC grading does not always reflect practicalities of farming. Merging the 88 ha of SFI area to long-term grassland under solar panels will have no effect on food production.

2.1.2 Approximately 49 ha in the north-east of Solar Development Site 1 is managed under a grazing and mowing licence, which includes a nectar flower mix and a

winter bird food mix. Use of this land for solar panels will similarly have no direct effect on food production.

Higher value crops including potatoes, carrots, beetroot and peas have been included in the crop rotations since 2019 in the south-west of Solar Development Site 1, across fields totalling around 48 ha. Over five years there has been an accumulated area of approximately: 20 ha for potatoes; 32 ha for carrots; 46 ha for beetroot; and 18 ha for vining peas.

2.1.3 Defra statistics (Ref 2) are available for potatoes (early/main crop and seed). From 2022 to 2024, potato yields averaged 47 tonnes per hectare and totalled 5.1 million tonnes. The yield of the potato crop from Solar Development Site 1 represents around 0.02% of the UK totals.

2.1.4 Other field vegetables (including vining peas) do not have a full set of individual statistics. The total UK area planted to vegetables in 2024 was around 97 thousand hectares. With an accumulated area of around 96 ha, the vegetable output of Solar Development Site 1 represents around one-thousandth of UK production based on area (noting that on a per-year basis, the proportion will be smaller).

Of the remaining ~146 ha of agricultural land within Solar Development Site 1, most is in a cereal rotation of wheat, barley and oats. In its most prevalent year (2023), there were around 30 ha of oilseed rape (OSR).

2.1.5 In 2024, the national yield of OSR was around 824,000 tonnes. At a three-year-average yield of 3.2 tonnes per hectare, Solar Development Site 1 contributes around 0.01% to the UK yield of OSR.

2.1.6 In 2024, the UK cereal yield was just over 19.4 million tonnes, with a value of around £3.5 billion. With an overall three-year-average cereal yield of 6.8 tonnes per hectare, approximately 116 ha of cereal crop from Solar Development Site 1 is calculated to contribute around 790 tonnes, or 0.004% of the UK's cereal crop.

To summarise, 331.5 ha of Solar Development Site 1 is in agricultural use, with around 194 ha in an arable rotation that includes occasional vegetable crops. The other approximate 40% of Solar Development Site 1 is managed for ecological purposes or on a mowing and grazing arrangement which does not directly contribute to domestic food production. The crops that are grown in Solar Development Site 1 represent proportions of between 0.004% and 0.02% of UK output.

The Estate that owns the land within Solar Development Site 1 extends to over 1,000 ha. The Estate's literature (Ref 3) notes that there are large areas of land that are "noteworthy for their root-crop carrying capacity," being cropped with carrots, potatoes, turnip and beetroot. The land in Solar Development Site 1, which amounts to around one-third of the Estate, is therefore likely to represent some of the lowest productivity land available.

2.2 Solar Development Site 2

2.2.1 Solar Development Site 2 includes 82.8 hectares (ha) of agricultural land, of which 77.2 ha is cropped. The ALC survey classified the land as a mix of Grade 1, Grade 2, Subgrade 3a and Subgrade 3b.

Cropping data from the landowner shows approximately half of the land being in OSR in 2024, to be followed by winter wheat in 2025 and vining peas in 2026. The other half of the land was cropped with winter wheat in 2024, then 33 ha was to be sown to maize for 2025 and winter wheat for 2026, whilst the two smallest field parcels, totalling 4.4 ha, were planted to legume fallow under SFI in 2025, for a minimum of three years.

The two large fields to be under OSR, winter wheat, then vining peas were in wheat in 2021, for which detailed cropping records have been supplied. The average wheat yield from the two fields was 10.7 tonnes per hectare from 37 ha of land (approximately 396 tonnes total). In comparison, the UK average for 2021 was 7.8 tonnes per hectare. The relatively high yield may be attributed to the specific variety of wheat more so than being a direct reflection of the quality of the land; the holding used five separate wheat varieties in 2021 across all land in their management, with an overall average yield of 9.8 tonnes per hectare, but ranging from 4.3 to 15.6 across varieties and fields.

2.2.2 Cropping data from the other two large fields is available from 2019 when both fields were under spring beans. The total cropped area was 33.5 ha from which 120 tonnes of beans were harvested in total. However, one field yielded 5.6 tonnes per hectare while the other only yielded 0.7 tonnes per hectare. The reason for the difference is not known. It is, however, interesting to note that the field with the poorer yield is classified as Grade 1 and Grade 2 quality agricultural land, further highlighting that BMV quality does not necessarily equate to the highest productivity.

2.3 Solar Development Site 3

In 2024, all of the agricultural land in Solar Development Site 3, amounting to 19.9 ha, was under winter barley. The land is classified as a mix of Grade 2, Subgrade 3a and Subgrade 3b.

2.3.1 The three-year-average yield of barley from 2022 to 2024 was 6.2 tonnes per hectare. Solar Development Site 3 is estimated to have produced around 123 tonnes. The national yield was around 7.1 million tonnes. Solar Development Site 3 is estimated to have contributed around 0.002% to the national yield.

In terms of food security, it should be noted that barley is primarily used by the brewing industry and for livestock feed, and is therefore not typically directly for human consumption.

2.4 Solar Development Site 4

2.4.1 Solar Development Site 4 includes 280 ha of agricultural land. The ALC survey classified the land as a mix of Grade 1, Grade 2, Subgrade 3a and Subgrade 3b.

The crop data supplied by the landowner shows that in 2024, approximately 13 ha had a carrot crop, 58.2 ha had a sugar beet crop, 24.1 ha had spring beans, 47.7 ha were in OSR,

and the remainder was under a cereal crop. Going into 2025 and 2026, 75 ha is sown to winter bird food, legume fallow or flower-rich grass, so is not currently available for food production.

2.4.2 Carrots do not have individual Defra statistics available but are incorporated into the category of field vegetables. The total UK area planted to vegetables in 2024 was around 97 thousand hectares. The capacity for growing carrots in Solar Development Site 4 represents around 0.01% of UK vegetable production by area.

2.4.3 The three-year-average yield of sugar beet for 2022 to 2024 was 73 tonnes per hectare. Solar Development Site 4 is estimated to have produced around 4,230 tonnes, a contribution of around 0.05% of the national yield of 7.8 million tonnes.

2.4.4 The three-year-average yield of beans was 3.2 tonnes per hectare. Solar Development Site 4 is estimated to have produced around 77 tonnes of beans, around 0.02% of the national yield of around 406,000 tonnes.

2.4.5 In 2024, the national yield of OSR was around 824,000 tonnes. At a three-year-average yield of 3.2 tonnes per hectare, Solar Development Site 4 contributes around 0.02% to the UK yield of OSR.

2.4.6 With an overall three-year-average cereal yield of 6.8 tonnes per hectare, and an average value of around £210 per tonne, approximately 137 ha of cereal crop from Solar Development Site 4 is calculated to contribute around 930 tonnes, or 0.005% of the UK's cereal crop.

2.4.7 For 2026, 83 ha is to be cropped for maize (which is primarily grown for livestock consumption, not for human consumption), and therefore in addition to 75 ha for environmental schemes, 158 ha of agricultural land at Solar Development Site 4 is not directly contributing to UK food security. Of the remaining land, 13 ha will be used for potatoes and the rest (approximately 122 ha) for wheat.

2.5 Solar Development Site 6

2.5.1 Solar Development Site 6 includes 98.3 ha of agricultural land. The ALC survey classified the land as a mix of Grade 1, Grade 2, Subgrade 3a and Subgrade 3b.

Solar Development Site 6 is located on the south-east side of the interchange of the Northern and the TransPennine Express railway lines. Within the junction, adjacent to Solar Development Site 6, is an AD plant. Crops grown across around 51 ha within Solar Development Site 6 primarily comprise a hybrid rye that feeds into the AD plant. Conversion of the land from energy crop production to solar energy production will have no effect on food security. Some of the land has an occasional wheat crop.

2.5.2 Approximately 5 ha is sown to pollen and nectar mix and has no direct contribution to food production.

The remaining 42 ha is mainly under a rotation of wheat, peas, barley and rye. The rye is a hybrid crop grown for the AD plant, and, as noted under Solar Development Site 3, barley is also not typically for direct human consumption.

2.5.3 Peas may be grown for animal or human consumption. To note, some pea crops grown for human consumption will be used for animal feed if the crop does not meet the required grade. The largest area at Solar Development Site 6 used for growing peas within the last ten years was around 21 ha. The yield is estimated to have been around 58.8 tonnes. National pea production for human consumption in 2024 was 119,000 tonnes. In its most prevalent year, assuming the crop was for human consumption, peas would have amounted to around 0.05% of the national yield.

Assuming in a typical year that approximately two-thirds of the 42 ha is used for wheat, 28 ha is estimated to produce a yield of around 224 tonnes based on the 2022 to 2024 three-year-average yields. This represents 0.002% of the national wheat yield of 2024.

2.5.4 Given the crop mix, it is possible that in some years, no crops produced at Solar Development Site 6 will be directly for human consumption and therefore would have no direct impact on food security.

2.6 Solar Development Site 7

2.6.1 Solar Development Site 7 includes 8.6 ha of agricultural land. The ALC survey classified the land as a mix of Grade 2, Subgrade 3a and Subgrade 3b.

The land is under an arable rotation of pea, rye, wheat and barley. This is the same crop mix as the 42 ha at Solar Development Site 6. Similarly, it is possible that in some years, no crops produced at Solar Development Site 7 will be directly for human consumption and therefore would have no direct impact on food security.

2.6.2 An area of 8.6 ha is estimated to have produced an estimated wheat yield of around 70 tonnes, or less than 0.001% of the national yield.

At an average yield of 2.8 tonnes per hectare, 8.6 ha of peas would produce around 24 tonnes. National pea production for human consumption in 2024 was 119,000 tonnes. A pea crop at Solar Development Site 7 would represent approximately 0.02% of the national yield of peas grown for human consumption (but may have been for animal feed).

2.7 Solar Development Site 8

2.7.1 Solar Development Site 8 includes 59.6 ha of agricultural land across two fields. The land is classified as a mix of Grade 2, Subgrade 3a and Subgrade 3b quality. The smaller field is entirely of Grade 2 and is managed independently of the large field in terms of crop choices.

Over the last ten years, the land has collectively been under a rotation of wheat, barley and OSR, with occasional peas and one crop each of beans and potatoes.

In some years, the larger field has a split crop. Using crop patterns visible from satellite imagery, the maximum area that would have been cropped for potatoes is around 32ha. From 2022 to 2024, potato yields averaged 47 tonnes per hectare. The yield of the potato crop from Solar Development Site 8 is estimated at 1,500 tonnes, which represents 0.03% of the 5.1 million tonne national yield of 2024.

2.7.2 Similarly, the maximum area of OSR and peas in any one year is also estimated at 32 ha. In 2024, the national yield of OSR was around 824,000 tonnes. At a three-year-average yield of 3.2 tonnes per hectare, Solar Development Site 8 contributes up to 0.01% to the UK yield of OSR.

At an average yield of 2.8 tonnes per hectare, 32 ha of peas would produce around 90 tonnes. National pea production for human consumption in 2024 was 119,000 tonnes. A pea crop at Solar Development Site 8 would represent approximately 0.08% of the national yield of peas grown for human consumption (but may have been for animal feed).

2.7.3 The bean crop was in the smaller field parcel, which extends to approximately 5 ha. The three-year-average yield of beans for 2022 to 2024 was 3.2 tonnes per hectare. Solar Development Site 8 is estimated to have produced around 16 tonnes of beans, around 0.004% of the national yield of around 406,000 tonnes.

2.7.4 In all other years, assuming the whole of Solar Development Site 8 is under cereal crop, which averages around half wheat and half barley over the last ten years, there would be approximately 240 tonnes of wheat, and 185 tonnes of barley. Out of a national yield of 19.4 million tonnes of cereal crop in 2024, production at Solar Development Site 8 equates to around 0.002%. As previously noted, barley is not typically used directly for human consumption.

3 Discussion

3.1 Solar Development Site Summaries

Of the approximate 900 ha of agricultural land across Solar Development Sites 1 to 4 and 6 to 8, 272.4 ha is under an SFI scheme or is used for the production of energy crops. Almost one-third of the agricultural land within the Solar Development Sites therefore does not produce food, and would not represent a loss to UK food production or have an impact on domestic food security should the Proposed Development proceed.

The agricultural land within Solar Development Site 1 represents some of the lowest-productivity land within the holding.

The agricultural land within Solar Development Sites 2, 3 and 4 used for crop production amounts to around 303.3 ha. The holding extends to around 1,100 ha in total. Land in the Solar Development Sites therefore accounts for around 28% of the land holding. Should the Proposed Development proceed, 72% of the holding will continue to be available for food production and environmental schemes.

3.1.1 Much of the agricultural land within Solar Development Site 6 has been used for the last ten years to grow hybrid rye which is foraged to put in the AD plant. The land is already used for energy production. The introduction of solar panels will have no effect on food production from the applicable land area.

3.2 Cumulative Losses

Throughout this report, contributions to national yields assume that all of the produce remains in UK markets for domestic consumption. The report does not account for any exports.

3.2.1 For the various crops grown, the accumulated % contributions to the national yield of each crop type, for all Solar Development Sites combined, are estimated as follows:

Potato	OSR	Cereal (combined)	Wheat	Barley	Beans	Sugar Beet	Peas	Carrot (area)
0.05	0.02	0.011	0.007	0.002	0.086	0.05	0.15	0.02

3.2.2 As the contribution of each SDS to each crop is typically less than 0.1% of the total yields, much of which is used for animal feed, the temporary loss of production can be considered negligible.

References

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Ref 2 Defra (2025). Agriculture in the United Kingdom 2024, Chapter 7: Crops. https://www.gov.uk/government/statistics/agriculture-in-the-united-kingdom-2024/chapter-7-crops#cereals

Ref 3 Escrick Park Estate (2026). Farming and Forestry. https://www.escrick.com/on-the-estate/farming

Ref 4 IEMA (2022). A New Perspective on Land and Soil in Environmental Impact Assessment

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