

WEST HADDLESEY PARISH MEETING (WHPM) – WRITTEN REPRESENTATION FOR 6 OCTOBER DEADLINE (DEADLINE 3)

1. INTRODUCTION

This document provides comments on information received at deadlines 1 and 2 and accepted by the Examining Authority in line with the process set out in the Rule 8 letter of 4 August 2026.

The focus of this letter is primarily to provide a response by the West Haddlesey Parish Meeting (WHPM) to those documents submitted at those deadlines in relation to Traffic and Transport to Site 4.

No part of this representation has been drafted using Artificial Intelligence (AI) and none of the information presented has involved the use of AI.

2. WHPM COMMENTS ON INFORMATION RECEIVED AT DEADLINE 1

2.1 WHPM Comments on LVS Document - Written Summary of Applicant's Oral Submissions Issue Specific Hearing 1 - Document Reference: EN0110012/APP/LVS/08.08 – August 2026

Appendix B of this document provides a Technical Note in response to the Examining Authority's request that the Applicant make clear the options that have been considered for access route to Solar Development Site 4, and why the route from the A19 via West Haddlesey was selected.

2.1.1 WHPM Comments on Section B.5 Route 1 via West Haddlesey

LVS states at B.3.1 that (**our bold**):

*"The route options have been considered against a set of transport and access criteria relevant to construction traffic routing. These include directness from the Strategic Road Network (SRN), suitability of the local highway network, ability to serve the relevant Solar Development Site 4 access points, **interaction with local communities and sensitive receptors**, existing highway constraints and restrictions, requirement for additional highway works or traffic management, and consistency with the wider construction traffic strategy."*

As we have already demonstrated in our earlier written submissions, LVS did not consider any of the sensitive receptors and single lane bridge in West Haddlesey when deciding on the route to Site 4 (see also 3.1.2.1 below).

At B.5.1 LVS states that (**our bold**):

*"This route provides a direct connection from the SRN to Solar Development Site 4 and **avoids need for construction traffic to travel through additional settlements or undertake longer indirect movements before reaching the site.**"*

It should be noted that the alternative route via Gateforth would be along the A19 and Selby by-pass. The route would only pass through the settlement of Burn on the A19 which is on the SRN before passing through Gateforth. Burn is therefore already subject to very high traffic volumes. Gateforth village has no receptors and is already identified as a construction route for the Cable Corridor. Gateforth New Road and Hillam Road fall outside the scope of the Prohibition of Heavy Commercial Vehicles Order. It should be noted that Gateforth is also

subject to a 40mph speed limit which indicates a lower density of development and pedestrian activity when compared to West Haddlesey which has a 30mph limit. The impact on additional settlements is therefore not central to the consideration of the alternative route and we contend that the use of the alternative route would avoid the significant problems inherent in the route through West Haddlesey (which are in part recognised by LVS at B.5.2 in the document).

The comment regarding longer movements is not considered a compelling line of reasoning. Google map data, from the M62, J34, to a point midway along Roe Lane, gives a car driving time of 13 minutes using the route through West Haddlesey compared with 27 minutes for the route from the A63 along Gateforth New Lane and Hillam Road. We consider that, when judged against the presence of sensitive receptors; community impact; risks to road users; and pedestrians by using the West Haddlesey route, such a relatively small difference in journey time should not be a factor in deciding on the most appropriate route. The applicant has stated that “the construction access strategy was not focussed on financial implications” (Applicants Response to Submissions Received at Deadline 1, September 2026 REP1-017, WR-WHPM-17, p16). Therefore, it is to be expected that the financial implications of this small difference in journey times would be acceptable to LVS given that it is consistent with their stated position that the focus is not on financial implications.

2.2.2 WHPM Comments on Section B.6 Route 2: via Gateforth

At B.6.1 LVS recognised that this route allows approaches by other points on the SRN however they reiterate the issue about longer journey times. Our response, given immediately above, is also relevant to the applicant’s statement at B.6.1.

We also note at B.6.1 that the applicant does not identify the correct alternative route which would be from the A63 (Selby by-pass) alone Gateforth New Road and Hillam Road to Roe Lane. Instead, they propose a routing along Pale Lane which was never identified by LVS as a construction route whereas the route through Gateforth and onto Hillam Road is already accepted by LVS as a route for construction traffic. We are pleased that the Examiners have also identified this error and that it is reflected in their question on routing to SD4 (Q1.14.8).

We would ask that the Examiners also note that Gateforth New Road and Hillam Road fall outside of the area covered by the Heavy Commercial Vehicle Prohibition Order put in place by NYC. We maintain our position that this Order, although not prohibiting construction vehicles, is a tacit acknowledgement by North Yorkshire Council that the route from the A19 through West Haddlesey is inherently unsuitable for HGV traffic. This Order is not mentioned by LVS in this document when considering an alternative route.

2.2.3 WHPM Comments on Section B.8 Preferred Route and B.9 Summary

These Sections deal with the choice of route for Site 4 through West Haddlesey and construction vehicle forecasts are presented. We consider that basing these forecasts on other planning documents from other solar sites is liable to be inaccurate.

We maintain our view that LVS should provide a breakdown HGV categories and movements based on what is actually being constructed. We recognise that the Examiners have questioned the traffic movement data in their Q1.14.4. We would also wish there to be some consideration of whether the predicted vehicle movements for comparable solar sites have been reliable when compared to actual vehicle movements. It is our understanding that during the actual construction period at other sites there have been significantly greater peak

movements than those predicted. We ask that Examiners consider whether LVS should be required to provide information on detailed post-construction assessments or audits that may have been undertaken for built solar sites that compare actual vs predicted movements especially with regard to peaks in traffic movements in order to validate their predictions. We consider this has relevance for all Sites.

In their summary at B.9 the Applicant states that:

“All A19 approaches require construction traffic to pass through settlements and would therefore generate comparable local effects. Consequently, the route via West Haddlesey was identified as the preferred option as impacts can be managed, noting that the assessment is based on a worst-case assumption that all traffic would use this route; in reality there will be assignment of some traffic onto the routes from other parts of the Strategic Road Network.”

WHPM contends that, for the reasons set out in our detailed written comments at Deadline 1 and in this document, that the alternative route via Gateforth New Road and Hillam Lane would not *“generate comparable local effects.”* The route by Gateforth New Road and Hillam Lane is not as problematic as the route through West Haddlesey and presents a much lower risk.

We also consider that the LVS statement that *“West Haddlesey was identified as the preferred option as impacts can be managed”* is somewhat disingenuous as the decision on routing via West Haddlesey was taken by LVS at a time when they were totally ignorant of the presence of receptors such as the park, Village Hall, primary school and children's playground along that route and without knowledge or consideration of the single lane Tankards Bridge that has no footways.

2.2.4 WHPM conclusion

We consider a responsible approach from the Applicant would be to seek alternative solutions that would avoid HGV and construction traffic on an unsuitable road and minimise the risk to road users and pedestrians. This is especially the case given the rationale for the imposition of the Heavy Commercial Vehicle Prohibition Order and the risks inherent in the route through West Haddlesey. An Applicant committed to minimising the impact of a development on communities would work constructively to consider alternatives in detail and, rather than simply ignore the Prohibition Order, would recognise the importance of addressing the underlying safety concerns. Based on their responses thus far, WHPM judge that LVS has shown little willingness to do this in any considered way nor have they engaged constructively with communities impacted by their proposed development.

2.2 WHPM Comments on North Yorkshire Council Documents

NYC Letter of 11 August 2026 regarding Post Hearing Submissions Action Points

NYC Document – Local Impact Reports from Local Authorities

We wish to record our concern that the lack of resources at North Yorkshire Council may be limiting their ability to adequately engage with the process, particularly with regard to the traffic and transport concerns in relation to the route to Site 4 and more generally for the other Sites.

WHPM note that, in the letter regarding Post Hearing Submissions Action Points, NYC state that:

“Due to the short timescale provided for submission, and the absence of key technical officers, North Yorkshire Council is not in a position to provide responses to all action points required for Deadline 1.”

WHPM also note that the Local Impact Report only contains two points where NYC comment on the route to Site 4 (points 12.11 and 12.12 on page 35) despite the significant road safety concerns being raised in relation to this route and other routes throughout the area covered by the proposed development.

Although we welcome the Examiners’ inclusion of NYC in the question posed on the construction route to Site 4, we ask that Examiners remain mindful that resource constraints at NYC could be a factor in any response received. It is clear in the LIR that there are significant differences in relation to the resources available within NYC with extensive responses on Ecology and Biodiversity, which is covered in 14 pages, but much more limited responses on Traffic and Transport with only 6 pages on this key area that has relevance to the safety of road users and communities; and where important concerns regarding road safety have been raised by multiple Parish Councils and others.

3. COMMENTS ON INFORMATION RECEIVED AT DEADLINE 2

3.1 Light Valley Solar Environmental Statement Volume 1 Chapter 14: Traffic and Movement Document Reference: EN0110012/APP/LVS/06.01.14 September 2026 Version 2. (Clean Version)

3.1.1 Important general point:

Before the specific points on the document, that are listed below, WHPM have one important general point on the baseline figures for HGVs travelling through West Haddlesey. The existing figures used by LVS for HGVs are moot as, since June 2026, the Birkin Road; Haddlesey Road; and Millfield Road, have been covered by a NYC Prohibition of Heavy Commercial Vehicles Order that prohibits through traffic over 7.5 tonnes. Our expectation is that once signage and information on the Heavy Commercial Vehicle Prohibition Order permeates to hauliers then the through traffic numbers of HGVs will drop, making the LVS construction HGVs form a much greater proportion of HGV traffic. This is a significant change which undermines the assessment conducted and presented in the documentation.

3.1.2 Specific points:

3.1.2.1 Receptors in West Haddlesey

In Table 14-8, for Birkin/Millfield Road, LVS state, under High Sensitivity, that: *Birkin / Millfield Road passes through the residential area of West Haddlesey. The route has a footway on at least one side of the carriageway but passes by Chapel Haddlesey Primary School, a sensitive receptor.*

The revised document **still** makes no mention of the West Haddlesey Children’s Playground nor the Doorstep Green Recreation Park nor the Village Hall. None of these are identified as high or even medium receptors yet all add to the concerns about this route choice and have

been repeatedly identified to LVS. They remain unrecorded and unaddressed in the revised core LVS documents. Only the school is mentioned as a sensitive receptor in the revised Traffic and Movement Plan and mentioned in the revised oCTMP.

This is particularly disappointing given that sensitive receptors, as defined in Table 14-8 of the Traffic and Movement Plan, explicitly identify playgrounds as being receptors of high sensitivity; and community centres (Village Hall) and parks/recreation areas (DoorStep Green) as being receptors of medium sensitivity. It difficult to avoid the conclusion that this is a deliberate act of omission to avoid documenting fully the hazards and risks posed by this route. WHPM is of the opinion that, by not recording their existence in their core documentation, LVS avoid the difficulties in mitigating the risks posed by use of the route. Clearly mitigating the risks posed to the community using these facilities is inherently more problematic given that, unlike the school, these facilities are in use throughout day and also into the evening and weekends.

In relation to mention of footways, the route has no footway at the single lane Tankards Bridge which is the only crossing point of the Selby Canal for pedestrians. The footway to and from the school is also narrow and on the opposite side of the road to the school. Footways in the village also change sides of the road necessitating pedestrians to cross over the roadway at several points.

3.1.2.2 Baseline Traffic Flow

In Table 14-8, on page 53, LVS correct the baseline traffic flow for Haddlesey Road from the incorrect figure of 50 to 9 however the %HGV figure has not been corrected, an incorrect figure of 14% HGVs remains in the table when the correct baseline figure for Haddlesey Road should be 3%. This error is also present in Table 14-19 on page 70.

WHPM now note the corrected figure of a 69% increase of HGVs on the Haddlesey Road and 26 % increase on the Birkin Road. We consider these increases are significant along a road where NYC has been sufficiently concerned about its suitability for heavy commercial vehicles that it is subject to a Heavy Commercial Vehicle Prohibition Order for through traffic. The expectation is that peak levels would be higher. Given the receptors in West Haddlesey (see 3.1.2.1 above) we maintain our conclusion that this route is unsatisfactory and poses a high risk to road users, pedestrians, residents and children.

3.1.2.3 Accident blackspot – A19 Chapel Haddlesey Crossroads

At 14.8.32, page 57, LVS maintain that there is no evidence of accident clustering at the A19 Chapel Haddlesey crossroads. We stand by our detailed comments made in our response to Deadline 1 with regard to accidents at the A19 crossroads. 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 and that this is a well-known accident blackspot.

3.1.2.4 Vehicle speeds through West Haddlesey

In Table 14-30, on page 97, and Table 14-31 on page 98, vehicle speeds are given for the Birkin and Haddlesey Roads. WHPM considers these are not representative of the concerns in West and Chapel Haddlesey about speeding. We assume these figures are derived from

the automated traffic count data generated by LVS. While we accept that they reflect the collected data, the placement of the automated traffic counters was in areas where vehicles would be travelling slowly due to parked vehicles and other road constraints. There are long standing concerns about speeding along the straight areas of road either side of Tankards Bridge such that WHPM has approached NYC with a view to gathering automated traffic data in the areas of concern to support the establishment of a Community Speed Watch. We would ask that Examiners treat the vehicle speeds presented in Table 14-30 with caution as they are highly likely to underestimate the propensity of vehicles to speed on the straight stretches of road either side of Tankards Bridge.

3.2 Light Valley Solar Outline Construction Traffic Management Plan (oCTMP) **Document Reference: EN0110012/APP/LVS/07.12 September 2026 - Version 2**

And also 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

3.2.1 Conflicts with school hours

In Section 3.14 of the oCTMP - HGV timings and Restrictions on Working Hours LVS at 3.14.5 LVS still state that (**our bold**):

*"The CTMP will commit to measures to encourage construction vehicles avoiding the need to travel during the network peak hours. Therefore, **deliveries will be scheduled for between 09:30 and 16:30**, unless this not practically possible following delays or an emergency (or if deliveries are required for activities requiring 24 hour activity such as HDD). **This will avoid HGV traffic arriving during the morning peak hours, creating conflict with local residents' commute or school runs.** Construction worker shifts will be scheduled so that workers are not travelling during the network peak hours of 08:00-09:00 and 17:00-18:00."*

WHPM has already stated in our submission at Deadline 1 that *"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."*

The LVS oCTMP still allows deliveries to take place between 09.30 and 16.30. As we have stated, the school closes at 3.30pm therefore children **not** attending the after-school club are picked up at 3.30pm which is during the period that LVS has identified as suitable for deliveries. This is a direct conflict with the afternoon school run.

It should also be noted that LVS also does not address this conflict in their Response to Submissions at Deadline 1- EN0110012/APP/LVS/08.19 of September 2026 simply stating, on page 11 of that document, that the oCTMP includes timing restrictions to avoid the core school pick up and drop off times which is clearly untrue as pick-up time is not avoided.

3.2.2 Conflicts with other pedestrians

Additionally, in our submission at Deadline 1, we also stated the following, with respect to concerns about the risks to others:

“The restriction on deliveries appears only proposed in relation to the school however 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 (see SD2 Figure 27 as an example). This again underlines the unsuitability of this route.”

This is not covered by the mitigation presented in the updated oCTMP and no response on the above point is provided in the LVS Response to Submissions at Deadline 1-EN0110012/APP/LVS/08.19 of September 2026. Our point is made in the Table in that document at REP1-017, WR-WHPM-08 on pages 11-12 but the response fails to address the above point.

LVS has repeatedly maintained that *“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]”*.

WHPM contend that, taken together, the HGV traffic; large numbers of LGVs; and worker car traffic involved in the construction of Site 4 and the Cable Corridor represent a material change in risk given the number of receptors and hazards presented by this route and which LVS have only recognised at a late stage in the process and several of which are still not reflected in their core application documentation.

3.2.3 Saturday construction traffic and weekend working

In our Deadline 1 submission, WHPM identified weekends as being the peak time for recreational use of the area including by cyclists and horse riders. We stated in our Deadline 1 submission that Saturday working would present a high risk of accidents and 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.

We consider that the response to this point, REP1-017 WR-WHPM-11 on page 13 of the LVS Response to Submissions at Deadline 1-EN0110012/APP/LVS/08.19 of September 2026, is inadequate. LVS do not address the risk to vulnerable road users in any meaningful way. LVS simply state that the work is necessary to allow an efficient construction programme. We consider that this inadequate and does not address the safety aspects. We ask that Examiners consider this concern further.

4. OVERALL

WHPM maintains our position that the route to Site 4 from the A19 is not a suitable route for HGVs nor for the proposed large number of cars and light goods vehicles that would bring workers to Site 4. Use of this route represents a significant risk to the safety of road users and pedestrians. WHPM welcomes the questions posed by Examiners about the use of an alternative, and in our view significantly safer, route.

Our overall position on the proposed LVS application is unchanged and we remain supportive of the concerns raised by affected Parish Councils that have submitted comments.

5 October 2026