

Light Valley Solar

Statement of Common Ground with National Highways

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APFP Regulation 5(2)(q)



**Light Valley
Solar**

Infrastructure Planning

Planning Act 2008

The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

Light Valley Solar

Deadline 3 Submission

Statement of Common Ground with National Highways

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1 Introduction

1.1 Purpose of this document

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared to support the Examination of the Development Consent Order (DCO) application for Light Valley Solar (the Proposed Development).
- 1.1.2 This SOCG has been prepared jointly by Light Valley Solar Ltd. (the Applicant) and National Highways (NH) to clearly identify the current position of the respective parties on specific matters that are, or have been, under discussion. It seeks to confirm to the Examining Authority (ExA) where there are points of agreement between the parties and where agreement has not been reached to date. It therefore aids the ExA in identifying any specific issues that may need to be addressed during the Examination and provides a structure to any further discussions for the parties engaged in the SoCG.
- 1.1.3 This document has been prepared in response to a specific request from the ExA as per the Rule 6 Letter [PD-003] issued on 19 June 2026.

1.2 Terminology

- 1.2.1 Section 2 of this document sets out the relevant matters raised through discussion between the parties. It provides a summary of the position of each party and identifies the status of discussions on each matter:
 - 1) “Agreed” means that a matter has been resolved between the parties and is not anticipated to be subject to further discussion.
 - 2) “Under discussion” means that a matter remains in active dialogue between the parties and a final position has not been reached.
 - 3) “Not agreed” means that the parties have established a final position that they cannot resolve the matter and will remain a point of difference.
- 1.2.2 In accordance with the request from the ExA in the Rule 6 Letter [PD-003], a **Low**, **Medium** and **High** ‘traffic light’ system is applied to each matter to indicate the likelihood of their resolution during the Examination period.

1.3 Status of this document

- 1.3.1 This document is in draft.

2 Current Position

- 2.1.1 Table 1 below provides a summary of the current position of the Applicant and National Highways.
- 2.1.2 Appendix 1 of this document provides a record of engagement undertaken between the parties in relation to the Proposed Development. This is limited to engagement which is materially relevant to the contents of this SoCG and does not seek to include every correspondence between the parties (e.g. that which was primarily administrative).

Table 1 Current position of matters relevant to the parties' discussions

Row ID	Topic	NH position	Applicant position	Status
RR ref NH-07	Transport and access	In its Relevant Representation (RR), NH stated that the Applicant should provide a detailed methodology for the TEMPro growth factors used to uplift baseline traffic data and forecast future baseline traffic flows. In its response to Applicant's responses at Deadline 1 NH noted that the quantum of movements at A1(M) Junction 42 is unlikely to have a material impact on the operation of this junction.	A response was issued to NH07 in The Applicant's Response to Relevant Representations Part 1 [PDA-014]. A response was issued at Deadline 2 to WR-NH-013 in The Applicant's Response to Submissions Received at Deadline 1 – Statutory Bodies, noting the response from NH and confirmed no further action is required.	Agreed
RR ref NH-08	Transport and access	In its RR, NH stated that the Applicant should secure a requirement for a Decommissioning Traffic Management Plan, to be submitted to and approved in consultation with NH before decommissioning commences. In its response to Applicant's responses at Deadline 1 NH noted that it needs to be a consultee for approval of the DEMP.	A response was issued to NH08 in The Applicant's Response to Relevant Representations Part 1 [PDA-014]. A response was issued at Deadline 2 to WR-NH-003, 014 and 022 in The Applicant's Response to Submissions Received at Deadline 1 – Statutory Bodies, stating that the draft DCO has been	Under Discussion

Row ID	Topic	NH position	Applicant position	Status
		Having reviewed the Applicant's response, NH's position is that paragraph 1.1.5 of the oDEMP should be updated to include reference to the DEMP (which is to incorporate a DTMP) being submitted to NH for approval. NH also request a change to Requirement 19 to make it clear that reference to "the relevant highway authority" includes National Highways.	amended to provide for NH's request in relation to approval of the DEMP, noting that the outline DEMP incorporates measures in respect of traffic management. The approving body for the DEMP is the local planning authority and therefore the Applicant will not be adding National Highways as an approver. The Applicant considers it unnecessary to include specific reference to National Highways in Requirement 19 because "highway authority" is defined in Article 2 of the Draft DCO [updated at Deadline 3] by reference to the Highways Act 1980, where section 1 of that Act confirms National Highways is a highway authority.	
RR ref NH-09	Transport and access	In its RR, NH stated that the Applicant should outline a strategy to monitor the implementation of the proposed travel schedules for deliveries and construction workers.	A response was issued to NH09 in The Applicant's Response to Relevant Representations Part 1 [PDA-014]. A response was issued at Deadline 2 to WR-NH-015 in The Applicant's Response to Submissions Received at Deadline 1 – Statutory Bodies, noting that the Applicant welcomes NH's position on the oCTMP.	Agreed

Row ID	Topic	NH position	Applicant position	Status
RR ref NH-10	Transport and access	In its RR, NH stated that the Applicant should involve NH as early as practicable in the management and routing of any Abnormal Indivisible Loads. In its response to Applicant's responses at Deadline 1 NH noted that it was content with the position set out in the Abnormal Load Report and the commitment should also be referenced in the oCTMP. In relation to Abnormal Indivisible Loads, NH's position is that all AIL's are to be dealt with/approved via the Electronic Service Delivery for Abnormal Loads (ESDAL).	A response was issued to NH10 in The Applicant's Response to Relevant Representations Part 1 [PDA-014]. A response was issued at Deadline 2 to WR-NH-016 in The Applicant's Response to Submissions Received at Deadline 1 – Statutory Bodies, noting that the oCTMP confirms that, where Abnormal Indivisible Load routes interface with the SRN, National Highways will be engaged through the relevant notification, approval and permitting processes applicable at the time of transport.	Agreed
RR ref NH-12	Transport and access	In its RR, NH stated that the Applicant should agree any signage proposed on the SRN with the relevant NH team before works commence. In its response to Applicant's responses at Deadline 1 NH noted that as the A1(M) is under motorway regulations NH would not permit any construction directional signage on the A1(M) and the oCTMP should acknowledge this.	A response was issued to NH12 in The Applicant's Response to Relevant Representations Part 1 [PDA-014]. A response was issued at Deadline 2 to WR-NH-018 in The Applicant's Response to Submissions Received at Deadline 1 – Statutory Bodies, confirming that Paragraph 3.6.4 of the oCTMP submitted at Deadline 2 confirms that no construction directional signage	Agreed

Row ID	Topic	NH position	Applicant position	Status
			associated with the Proposed Development would be placed on the A1(M).	
RR ref NH-14	Transport and access	In its RR, NH stated that the Applicant should ensure that vehicular trips generated by waste management activities are included in the assessment of construction traffic impacts on the SRN. In its response to Applicant's responses at Deadline 1 NH noted the Applicant's response.	A response was issued to NH14 in The Applicant's Response to Relevant Representations Part 1 [PDA-014]. A response was issued at Deadline 2 to WR-NH-020 in The Applicant's Response to Submissions Received at Deadline 1 – Statutory Bodies, noting National Highways' acceptance that construction traffic forecasts include waste removal activities.	Agreed
RR ref NH-15	Transport and access	In its RR, NH stated that the Applicant should include in the final CTMP the traffic management measures identified in the oCEMP. In its response to Applicant's responses at Deadline 1 NH had no further comment on this point. NH notes that the oCTMP para 1.1.6 advises that the final CTMP will be submitted for approval of the relevant Highway Authorities. This paragraph should be updated to be clear that relevant highway authority includes NH. In addition,	A response was issued to NH15 in The Applicant's Response to Relevant Representations Part 1 [PDA-014]. As secured in requirement 14(3) of the Draft DCO, the detailed CTMP will be approved by the relevant planning authority in consultation with the relevant highway authority. The oCTMP will be updated at Deadline 4 to be consistent with this requirement.	Under Discussion

Row ID	Topic	NH position	Applicant position	Status
		NH also request a change to Requirement 14 to make it clear that reference to "the relevant highway authority" in the requirement includes National Highways.	The Applicant considers it unnecessary to include specific reference to National Highways in Requirement 14 because "highway authority" is defined in Article 2 of the Draft DCO [updated at Deadline 3] by reference to the Highways Act 1980, where section 1 of that Act confirms National Highways is a highway authority.	
RR ref NH-16	Transport and access	In its RR, NH stated that it requests that it is included in the list of identified stakeholders for the Outline Decommissioning Environmental Management Plan [APP-194]. In its response to Applicant's responses at D1 NH noted that it needs to be a consultee for approval of the DEMP.	A response was issued to NH16 in The Applicant's Response to Relevant Representations Part 1 [PDA-014]. A response was issued at Deadline 2 to WR-NH-003, 014 and 022 in The Applicant's Response to Submissions Received at Deadline 1 – Statutory Bodies, stating that the draft DCO has been amended to provide for NH's request in relation to approval of the DEMP.	Agreed
Various locations	Protective Provisions and Lands/CPO	In its RR NR stated that it is not content with the Protective Provisions in the draft DCO, and objects to the powers of compulsory acquisition sought without appropriate protections in place.	A response was issued to NH17 in The Applicant's Response to Relevant Representations Part 1 [PDA-014] and in the Applicant's Response to Submissions Received at Deadline 1 – Statutory	Under Discussion

Row ID	Topic	NH position	Applicant position	Status
			Bodies in relation to these concerns, with some amends made to the DCO as a result. The parties continue to discuss the Protective Provisions.	
Various Locations	Schedule 16 and Requirement 3	National Highways have asked to be consulted on any changes made to the CTMP/DEMP pursuant to Requirement 3, via changes made to that Requirement and/or Schedule 16. NH is content with the amends made at Deadline 2 in relation to Schedule 16. The above change does not fully address NH's concern. NH require to be consulted on any changes to the approved documents where those changes have an impact on the SRN. NH require an amendment to Requirement 3 in this regard to make it clear that where the undertaker submits any amendments to any approved documents to the relevant planning authority for approval, the approval is subject to the consultation with NH in the context of the operation of the SRN or any of NH's interests in land.	The Applicant amended the draft DCO in this regard at Deadline 2. In response to NH's further comment, the Applicant considers that paragraph 1(b) of Schedule 16 already achieves this, given National Highways is required to be consulted in respect of the approval of the original plans (as secured by Requirement 14(3) in respect of the CTMP and Requirement 19(5) in respect of the DEMP), they would be required to be consulted again in the respect of any amendments to the approved documents. The Applicant considers this is sufficient, particularly in circumstances where the Proposed Development's Order Limits do not interact at all with the SRN and NH's interests in land within the Order Limits are confined to sub-soil interests where a limited interface with the Applicant's works is	Under Discussion

Row ID	Topic	NH position	Applicant position	Status
			anticipated. The Applicant has provided NH with detailed information on a plot-by-plot basis in this regard. Separately, the Applicant notes that the Protective Provisions will be engaged in respect of any land in which NH has an interest (not just interfaces with the SRN) to serve to protect NH.	

Appendix 1: Record of Engagement

Date	Method of engagement	Purpose / description
07.08.24	Email	Email to introduce National Highways to the Light Valley Solar project and to request an initial meeting to discuss transport planning scope and access strategy.
22.08.24	Teams meeting	To discuss Light Valley Solar project proposals.
03.12.24	Email	Email to alert team to the formal response sent to PINS with regards to their consultation on the EIA scoping for the Light Valley Solar project.
11.11.25	Teams meeting	To discuss transport aspects of the Light Valley Solar project following National Highways feedback (Technical Memorandum dated 02/10/2025).
21.05.26	Email	Email to National Highways to respond to Part B of the National Highways objection.
07.07.26	Email	Email response from National Highways, confirming that most of the issues raised in their objection have been closed out. Only outstanding matter is that construction directional signage would not be permitted on the A1 due to motorway regulations.
14.09.26	Email	Email to National Highways to share the draft SoCG for National Highways review.
21.09.26	Email	Email to National Highways to follow up on the request to review the SoCG.
02.10.26	Email	Email to National Highways to follow up on the request to review the SoCG.
05.10.26	Email	Email from National Highways to issue reviewed SoCG.

Appendix 2: Signing Sheet

Signature	
Name	
Position	
On behalf of	
Date	

Signature	
Name	
Position	
On behalf of	
Date	



Light Valley
Solar

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