The Planning Inspectorate

[via PINS portal]

Reference: [redacted]
Customer reference: EN0110012

10 November 2026

Dear Sir/Madam

COMMENTS ON THE APPLICANT'S PROPOSED CHANGES SET OUT IN ITS CHANGE REQUEST OF 13 OCTOBER 2026

LIGHT VALLEY SOLAR

This letter constitutes the Environment Agency's response to the Applicant's proposed changes set out in its change request of 13 October 2026. This is the Environment Agency's only Deadline 4 submission.

We have reviewed the submissions accepted by the Examining Authority (ExA), in particular:

- 08.42 Change Application and Consultation Report [CR1-047]
- 08.43 Supporting Environmental Information Report [CR1-048]

A summary of the Environment Agency's overall latest position is shown in Appendix A. The Environment Agency's position on individual issue IDs as raised in our Relevant Representation [RR-0419] is shown in Appendix B.

Change 1: Alternative Access Routes for Access CA2

Section 2.2.1 of the Supporting Environmental Information Report [CR1-048] describes how alternative construction access routes are being considered for access CA2.

As mentioned in Section 2.2.3 of the Supporting Environmental Information Report [CR1-048], the Applicant reached out to the Environment Agency to seek our comments on this. At the time, the Applicant explained that a temporary culvert over Dam Dike could be required, and we advised that culverting should be avoided here given that there are records of European eel downstream on the Dam Dike, therefore it is possible that they are occasionally present within the location of the crossing point. We advised the Applicant that a full-span crossing should be prioritised in this location to avoid unnecessary impacts to the channel and provide free passage of fish throughout the waterbody.

We advised that if a culvert was required, evidence must be provided to demonstrate that this design decision was appropriate. Evidence should be in the form of a field survey which assesses the aquatic habitat, and where habitat is present a fish survey to understand the presence of fish species. Moreover, if the waterbody is

simply dry, then evidence to support this would be required, such as a time stamped photograph.

We are pleased to read in Table 3-1 of the Supporting Environmental Information Report [CR1-048] that the preferred option is an open-span crossing, with no culvert proposed. On this basis, we are broadly satisfied with Change 1 and have no further comments to make.

Change 5: Extension of 275 kV On-Site Substation Compound in Solar Development Site 1

Section 2.3.1 of the Supporting Environmental Information Report [CR1-048] describes how there will be a change to the limits of deviation at the 275 kV On-Site Substation Compound.

We request confirmation from the Applicant that the proposed drainage solution for the 275kV onsite Substation compound will be able to accommodate runoff from this additional surface area with no adverse impact on the ability to manage potentially contaminated runoff from this feature.

Change 9: Abnormal Indivisible Loads Access to Access 3 of Development Site Solar 4

Change 9 involves the temporary widening of the existing culver over Roe Lane Drain. The Environment Agency opposes culverting, and we would reiterate the general comments we made in relation to culverts in our Relevant Representation [RR-0419].

We are pleased to read in Table 3-1 of the Supporting Environmental Information Report [CR1-048] that the Applicant will be completing the works under precautionary working methods (PWMs) and conducting pre-construction surveys before the works are completed. A pre-construction otter survey should be conducted no more than three months prior to the start of works. If new holts/resting places are identified, suitable mitigation should be put in place to mitigate for the feature.

We would request that the outline Construction Environmental Management Plan (CEMP) is updated to include a commitment to setting the soffit height of the culvert to a minimum of 600mm above the 1 in 100 year flood event.

Section 2.3.22 of the Supporting Environmental Information Report [CR1-048] briefly discusses the construction works required to widen the existing culvert over Roe Lane Drain. We would recommend that either “capping” of the existing culvert, to widen the load deck, or a “flyover” similar to that proposed for the railway crossing, be considered. Both options would reduce the amount of in-channel works required necessary for the extension/widening of the culvert and subsequent decommissioning and restoration activities.

As detailed in Table 4-2 of the Change Application and Consultation Report [CR1-047], the Applicant reached out to the Environment Agency to seek our comments

on the potential need for temporary widening of the existing culvert. We advised that there are records of European eel downstream on the River Aire, therefore it is possible that they are occasionally present within the location of the crossing point. We advised that, to ensure a betterment to the waterbody, and in line with Environment Agency policy, the existing culvert should ideally be removed and replaced with a full-span crossing. If it was deemed that the existing culvert needs to be widened, we advised that the Applicant must provide evidence that this design decision is appropriate. Evidence should be in the form of a field survey which assesses the aquatic habitat, and where habitat is present a fish survey to understand the presence of fish species. Moreover, if the waterbody is simply dry, then evidence to support this would be required, such as a time stamped photograph.

We note that Table 3-1 of the Supporting Environmental Information Report [CR1-048] states that Roe Lane Drain is a dry ditch and is unsuitable for fish. Provided that this waterbody is indeed dry and does not provide suitable habitat for fish, and the absence of fish has been confirmed, we take no issue with the temporary widening of this culvert, from a fisheries point of view.

We do not have any comments to make on the following changes:

- Change 2: Abnormal Indivisible Loads Access to CA19 via Harry Moor Lane
- Change 3: Field 6.9 – Solar Development Site 6 Reduction
- Change 4: Visibility Splays for Accesses 1 and 3 of Solar Development Site 4
- Change 6: Cable Route Corridor East of Garman Carr Lane
- Change 7: Solar Development 6 Bird Habitat Area
- Change 8: National Grid Monk Fryston Substation Accesses

We trust this advice is useful.

Yours faithfully

[redacted]
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for people and wildlife

Environment Agency

APPENDIX A – SUMMARY OF OVERALL EA POSITION

Agreed / resolved
Working on a solution / under discussion
Not agreed

Subject	Work package	Scope	Method and Assumptions	Results of Assessment (i.e Impact)	Mitigation / Enhancements Agreed	Requirement	RR ID
Biodiversity	**Ecological Assessment**						EA06, EA07, EA08, EA09
Fisheries	**Fish Impact Assessment**						EA01, EA02, EA03, EA04, EA05, EA06
Water Resources	**Water Supply Strategy**						
Flood Risk	**Flood Risk Assessment**						EA45, EA46, EA47, EA48, EA49, EA50, EA51, EA52
	Hydraulic Model						EA48, EA50, EA53
Surface Water Quality	**Outline Construction Environmental Management Plan**						EA13, EA18, EA24, EA25
	Outline Operational Environmental Management Plan					**13**	EA09,EA11, EA13, EA19, EA24, EA55
	Outline Decommissioning Environmental Management Plan						EA17, EA19, EA20, EA23, EA24
	Outline Battery Safety Management Plan						EA11, EA12, EA14, EA15, EA16, EA17

	Surface and Foul Water Drainage Strategy					**10**	EA10, EA15, EA16, EA23, EA25, EA54
	Water Environment Regulations Compliance						EA12, EA13, EA15, EA16, EA21
Groundwater Protection	**Outline Construction Environmental Management Plan**						EA13, EA31, EA34, EA37, EA38, EA39, EA40
	Outline Operational Environmental Management Plan					**13**	EA11, EA13, EA32, EA55
	Outline Decommissioning Environmental Management Plan						EA30, EA41
	Outline Battery Safety Management Plan						EA11
	Water Environment Regulations Compliance						EA13, EA21, EA28, EA33, EA36

APPENDIX B - ENVIRONMENT AGENCY'S POSITION ON INDIVIDUAL ISSUE IDS AS RAISED IN OUR RELEVANT REPRESENTATION

Agreed / resolved
Working on a solution / under discussion
Not agreed

Issue ID	RAG Status
EA01	
EA02	
EA03	
EA04	
EA05	
EA06	
EA07	
EA08	
EA09	
EA10	
EA11	
EA12	
EA13	
EA14	
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EA46	
EA47	
EA48	
EA49	
EA50	
EA51	
EA52	
EA53	

EA54	
EA55	
EA56	
EA57	
EA58	
EA59 (NEW)	
EA60 (NEW)	