WEST HADDLESEY PARISH MEETING (WHPM) – WRITTEN REPRESENTATION FOR TUESDAY 10 NOVEMBER 2026 DEADLINE (DEADLINE 4)

1. INTRODUCTION

This document provides comments from West Haddlesey Parish Meeting (WHPM) on the responses to the Examining Authority's (ExA's) first written questions and any further information received and accepted by the ExA at deadline 3.

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. COMMENTS

2.1 WHPM Comments on LVS Document – Statement of Common Ground with North Yorkshire Council - EN0110012/APP/LVS/08.33 October 2026

We have the following comments on the Statement of Common Ground with North Yorkshire Council.

2.1.1 Comment 1

Page 5: It is stated by NYC (LHA) that:

"The LHA's position is that there may be merit in utilising the Gateforth route to access Site 3 and the northern two accesses of Site 4, which would remove the need for construction traffic to travel through Birkin."

WHPC comment: Our position is that the Gateforth route should be the preferred construction route to the northern access point of Site 4 and the access points on Roe Lane (Access points 1, 2 and 3). This would avoid traffic going through West Haddlesey, given the significant concerns about this route, and would avoid the need for traffic to pass through Birkin.

We therefore support the comment made by North Yorkshire Council about the merit in using the Gateforth route and continue to support the use of this route for all construction traffic to Site 4 for the substantive reasons set out in our previous submissions.

We further consider that the use of haul roads from the access points on Roe Lane and the Hillam Road would eliminate the need to use the access point on the Haddlesey Road (Access point 4). Examiners may wish to pose further questions to LVS concerning the merits of haul roads from the Hillam Road and Roe Lane to avoid the need to access Site 4 from the Haddlesey Road and therefore avoiding entirely the routing of traffic through Birkin and West Haddlesey.

2.1.2 Comment 2

Page 5: In the same paragraph North Yorkshire Council state, in relation to the Gateforth Route, that:

"The ability of two HGVs to pass on the bend of Gateforth New Road and Hillam Road in Gateforth would require further investigation."

WHPC comment: If the ability of two HGVs to pass on the unclassified roads, being proposed as construction routes, is a salient issue then this concern is also pertinent to the route from the A19 through West Haddlesey along Millfield Road. The two sharp bends on

Millfield Road immediately after the A19 turning do not allow two HGVs to pass safely. This is particularly relevant as these bends are close to the entrance/exits of the recreation park. We raised this concern in our submission for deadline 1. Photographs illustrating the difficulty of two HGVs being able to pass in Millfield Road (on a straight stretch let alone a bend – Fig. 1. below) and an overview of the sharp bends (where the ability to pass on the bends would be unfeasible Fig 2. below) are reproduced below (taken from our submission made at Deadline 1).

Fig.1



Fig.2



These problems are a reflection of the NYC's own concerns about road through West Haddlesey which resulted in NYC imposing the Heavy Commercial Vehicle Prohibition Order. It should be noted that NYC have, in the last few weeks, put up the weight restriction signs at the A19 Chapel Haddlesey crossroads and on the approach roads covered by the Order. Equally, the ability to turn at the A19 crossroads into and out of Millfield Road is liable to be a significant concern if two HGVs (inbound and outbound) meet at that junction.

We commented previously that the North Yorkshire Council Impact Report did not fully examine the well documented concerns about the route to Site 4 from the A19 along Millfield Road, Haddlesey Road and Birkin Road. We consider their comment about presumed importance of the ability of two HGVs to pass in relation to the Gateforth Road supports the view that they have not considered such issues in detail in relation to the proposed route from the A19 along Millfield Road and through West Haddlesey (even though a Heavy Commercial Vehicle Prohibition Order was made by NYC in relation to the road from the A19 Chapel Haddlesey crossroads).

Therefore, although we are pleased that NYC see merit in the Gateforth route, we consider that Examiners may wish to consult further with NYC, if considered necessary, specifically about the safety issues and concerns in the use of the route from the A19 Chapel Haddlesey crossroads via West Haddlesey to Site 4 in direct comparison with the Gateforth route.

2.2 WHPM Comments on LVS Document – 08.25 The Applicant's Response to the Examining Authority's First Written Questions Document Reference: EN0110012/APP/LVS/08.25

2.2.1 Comment 1 – page 186 Construction traffic route - SDS4

We note and welcome the steps being taken to consider the route to Site 4 along Gateforth New Road and Hillam Lane and await a further submission from LVS.

See also our comments at 2.1.1 above.

2.2.2 Comment 2 – Section 2.9 of the LVS response to questions concerning landscape and cumulative effects

It is important to note at the outset that WHPM considers the size of the LVS development, one of the largest proposed in the UK, has a cumulative effect in its own right and impacts landscapes valued by local communities across wide swaths of the countryside from Escrick to Monk Fryston.

In response to questions relating to consideration of landscape, LVS concludes that the landscapes impacted by the proposed development are of 'low value' and therefore large-scale industrialisation in close proximity to several communities will cause no loss to those communities in relation to visual amenity and sense of place. The basis for the conclusion of low value is that that the landscape is primarily composed of open agricultural fields. We maintain that our local communities do value the existing nature of the outlook and tranquillity of the open views across farmland. For many living in a rural area is exactly that – a tranquil rural outlook rather than a large-scale industrial site.

We consider the argumentation advanced by LVS is flawed and continues to minimise the very real concerns about the transformation of the countryside from rural farmland around villages to industrial areas surrounded by fences, lights, CCTV and access roads. We recognise that the applicant has presented the results of an assessment using established guidelines but we consider the conclusions reached cannot be considered to be scientifically robust – this is not an exact science but rather a quasi-scientific subjective assessment informed by weakly validated assessment protocols.

The applicant states that (p117):

"It is important not to conflate emotional responses to landscape change with changes to perceptual characteristics. This is because the latter relate to identifiable qualities of the landscape itself, while the former reflect ***personal attitudes, values or preferences*** *about that change."*

The applicant goes on to state:

"The Applicant as [sic] *carried out a robust landscape assessment based on demonstrable changes to perceptual attributes, supported by evidence and* ***professional judgement****, rather than the varying emotional reactions of individuals."*

While the applicant makes the case that individuals and communities may have an emotional response to landscape change, our counter argument is that the use of "professional judgement" in their assessment, as a substitute for qualitative and quantitative evidence collected directly from affected communities, is equally subject to bias and "emotional factors" such as the need to get the project across the line for the applicant.

We therefore consider the LVS assessments regarding landscape can be equally criticised by being subjective and equally prone to reflect personal (or, perhaps more appropriately, corporate) attitudes, values or preferences. The applicant has gathered no structured data (e.g. surveys, focus groups) from impacted communities and yet intimates that individual/community responses (i.e. the primarily negative responses on landscape changes that have been made during the consultation process) can be sidelined as being 'emotional' responses.

We contend that these landscapes are not of low value but are intrinsic to the well being of local communities who value the views of farmland and rural outlooks. Our conclusion remains that the LVS assessments downplay the landscape and separation effects caused by solar development on the scale being proposed.

2.2.3 Q 1.9.8 Residential Amenity and living conditions

We have commented previously on the impact on dwellings and indicated our support for buffer zones greater than 30m from the curtilage of those properties impacted by the developement. We are pleased that the Examiners have questioned LVS's use of the Residential Visual Amenity Thresholds (RVAT) in these cases and underlined that this "*represents a very high threshold for private views and would indicate a substantial degree of visual change*".

Given that as the applicant states, in their response to the Examiners questions, that:

"Standard offsets from residential properties to solar farm development are not defined in law or policy. Neither national planning policy, the adopted Selby development plan nor current North Yorkshire planning policy prescribes a minimum separation distance between solar infrastructure and residential properties. The appropriate offset is consequently a matter of planning judgement informed by site circumstances, environmental assessment outcomes and good design rather than compliance with a fixed policy standard."

We therefore consider that the approach to affected properties should be precautionary and a distance greater than 30m from the curtilage should be imposed more generally especially, in some instances, mitigation planting will take up to, and possibly over 15 years, to be effective.

We do not consider that the applicant's desire for a 30m buffer, driven primarily by economic impact, should override the impact of affected residents and their enjoyment of their properties. We therefore continue to support the need for larger buffers to be decided on a case-by-case basis but we strongly support the use of the precautionary principle in such cases and, where there is uncertainty of outcome, the decision should favour a larger buffer. We consider that if, for example, a 240m buffer is necessary, at some residential properties, to reduce significant effects at year 1 of operation and eliminate those effects by year 15 of operation, then such a buffer should be imposed. The well-being of residents should be paramount in these instances.

10 November 2026

West Haddlesey Parish Meeting