Submission ID: SB3B8E8CA

Please find attached FIR-01 (First Information Request), submitted in response to the applicant's revised proposals.
The document identifies a number of technical queries and requests for information which, to the best of my knowledge, remain outstanding despite previous submissions and subsequent project revisions.
The information requested is considered necessary to enable residents to properly understand, assess and comment upon the revised proposals.
Submitted by:
Gary P. Yeadon, BSc (Hons), BEng (Hons)
Interested Party Reference: [redacted]
Respectfully submitted for inclusion within the Examination record.

FIRST INFORMATION REQUEST (FIR-01)

Outstanding Technical Queries Requiring Formal Response

Submitted by

Gary P. Yeadon, BSc (Hons), BEng (Hons)
[redacted]

Interested Party [redacted]

Introduction

I note that significant revisions have been made to the proposals, including changes to access arrangements, land requirements and related project elements. However, a number of previously submitted technical queries remain unanswered.

The following information is requested to enable residents to properly understand, assess and comment upon the revised proposals.

Where information has previously been provided, please identify the relevant document reference and page number containing the response.

Status at date of issue: Outstanding.

Ref	Information Requested	Status
Q1	Quality Plan (QP), including ITPs, hold points, witness points, sign-off responsibilities and revision control.	Outstanding
Q2	Current Health & Safety documentation and relevant Health & Safety records.	Outstanding
Q3	Camblesforth storm damage incident report, including root cause analysis, mitigation actions and findings.	Outstanding
Q4	Design Verification Package (DVP), including design assumptions, calculations, load cases, tolerances and reassessment findings.	Outstanding
Q5	Bills of Materials (BOM) and itemised assembly drawings	Outstanding

	for each site.	
Q6	Material durability, coating life, degradation and fatigue assessments supporting the stated 60-year project life.	Outstanding
Q7	Critical path network analysis for each site, including dependencies, float and risk assessment.	Outstanding
Q8	Transport route drawings from port/dock to site, including restrictions, constraints and abnormal load requirements.	Outstanding
Q9	Construction access, emergency access and internal road drawings for each site.	Outstanding
Q10	Acoustic assessment supporting the 91 dB at 250 m buffer claim.	Outstanding
Q11	Formal response to the previously submitted 90 dB at 250 m noise query.	Outstanding
Q12	Engineering basis, standards and justification supporting all setback distances.	Outstanding

Closing Statement

Residents consider the above information necessary to understand and assess the revised proposals. Formal responses against each item are respectfully requested.

Routing Note – Resident Submission (Two Documents)

This submission consists of two separate documents, each serving a distinct purpose and requiring separate consideration by the Examining Authority and relevant parties:

1. **Document 1 – Resident Queries Requiring Formal Response from Light Valley Solar (LVS)** Contains outstanding technical, safety, design, transport, acoustic, and quality-related queries that remain unanswered following the applicant's recent design changes. This document is directed to LVS for formal response.
2. **Document 2 – Notification to the Environment Agency (EA)** Advises the EA that LVS has not responded to key regulatory, environmental, and compliance-related queries. This document requests that the EA ensures the applicant provides the required information to support safe and compliant project progression.

Both documents are submitted through the Have Your Say portal for transparency, traceability, and inclusion in the Examination record. Each document should be logged separately under its respective title.

Document 1 – LVS Submission Intro

Purpose of Submission

This document presents the outstanding resident queries requiring formal response from Light Valley Solar. It consolidates concerns arising from the applicant's recent design changes, including alterations to access routes, land take, compulsory acquisition boundaries, and environmental proposals. Despite these revisions, the core resident questions previously submitted remain unanswered. Residents request clear, complete responses to each item before any further changes are progressed.

Document 2 – EA Submission Intro

Purpose of Submission

This document notifies the Environment Agency of outstanding technical queries that Light Valley Solar has not yet addressed. The applicant has revised access routes, land take, compulsory acquisition boundaries, and environmental proposals without providing responses to key safety, environmental, and compliance-related questions raised by residents. Residents request that the Environment Agency notes the absence of responses and ensures that the applicant provides the necessary information to support safe and compliant progression of the project.

Resident Submission – Outstanding Technical Queries Requiring Formal Response from Light Valley Solar (LVS)

Submission Title: Resident Concerns and Outstanding Technical Queries Requiring Formal Response from Light Valley Solar (LVS)

Section A — Controlled Resident Note to LVS / ExA

Subject: Outstanding Resident Queries and Concerns Regarding Latest LVS Design Changes

I wish to express my concern regarding the applicant's latest change of approach and the continued absence of responses to the core resident queries previously submitted. The applicant has altered access routes, land take, compulsory acquisition boundaries, and environmental proposals, yet none of the original questions have been answered.

These revisions are substantial, and the timetable must be adjusted to allow proper resident review and response.

Before any further changes are considered, residents request clarity on when these outstanding queries will be addressed.

Section B — Outstanding Queries Requiring Formal Response from LVS

1. **Bill of Materials (BOM) and Itemised Assembly Drawings — Per Site** Request full BOMs and itemised assembly drawings for each individual site, including components, sub-assemblies, interfaces, fixings, and site-specific variations. Confirm revision control and alignment with latest change-of-use updates.
2. **Transport Routes — Docks to Point of Delivery** Request complete transport route drawings from port/dock to each site, including road class, weight limits, turning radii, constraints, and abnormal load requirements. Confirm responsibility and any changes following design revisions.
3. **Road Route Drawings — Per Site** Request site-specific road route drawings covering construction access, emergency access, internal roads, and temporary/permanent routes. Confirm alignment with Highways references and any changes due to layout revisions.
4. **Health & Safety Report — Camblesforth Storm Damage** Request the formal H&S incident report for the Camblesforth catastrophic storm event, including root cause analysis, hazards, mitigation actions, competent person sign-off, and any RIDDOR considerations. Confirm whether the incident triggered design review or structural reassessment.
5. **Design Verification Package (DVP) — Camblesforth Catastrophic Failure** Request the full DVP covering design intent vs. as-built condition, load case assumptions, structural calculations, tolerances, deviations, and post-storm reassessment. Confirm corrective actions and updated risk register entries.
6. **Quality Plan (QP) — Site Specific** Request confirmation of the site-specific QP for Camblesforth and all other sites, including ITPs, hold/witness points, sign-off responsibilities, and version control. Confirm updates following storm damage or design changes.

7. **Upgrade of Drawings — From Multi-Purpose 2D to Working 2D/3D** Request confirmation that all multi-purpose 2D drawings have been upgraded to working 2D/3D construction-grade drawings, including interfaces, fixings, tolerances, and site-specific variations. Confirm revision accuracy and title block compliance.
8. **Site-Specific Test Procedures** Request test procedures for each site, including test locations, methods, acceptance criteria, calibration records, and competent person sign-off. Confirm alignment with QP, DVP, and any post-storm corrective actions.
9. **91 dB at 250 m Buffer — Not Published** Request publication of the 91 dB at 250 m acoustic buffer, including modelling assumptions, meteorological data, and low-frequency propagation. Confirm implications for mitigation and compliance.
10. **LVS-Defined Setback Distances — No Industry Standards Provided** Request confirmation of the industry standards, regulations, manufacturer requirements, or safety criteria used to justify LVS's self-determined setback distances. Require numeric values, compliance demonstration, and justification for absence of published standards.
11. **No Reply to 90 dB at 250 m Query** Request formal response to the previously submitted 90 dB at 250 m noise query, including verification, modelling, manufacturer data, and perimeter readings. Confirm whether updated noise maps or mitigation measures will be provided.
12. **Network Analysis — Critical Path for Each Site** Request full critical path network analysis for each site, including sequencing, dependencies, float, risk points, and change-of-use impacts. Confirm updates following storm damage or revised transport routes.
13. **Project Life Quoted at 60 Years — Material/Coating Analysis Not Confirmed** Request confirmation of material durability analysis, coating lifespan, environmental exposure assumptions, maintenance intervals, replacement cycles, degradation modelling, and structural fatigue assessments supporting the 60-year claim.
14. **Private Funding — Total Project Cost, Cost per Unit, Duration per Site** Request disclosure of total project cost, cost per unit, cost per site, and construction duration per site. Require confirmation of funding structure, cost governance, variation controls, and alignment with change-of-use revisions.

Submission ID: SD120D8E1

Cover Note to the Examining Authority

Submission: Request for Procedural Pause and Road Network Evidence Require

Please find attached a resident submission requesting that consideration of Light Valley Solar's Change Application be paused until the applicant provides full, factual, site specific road network cap proposed solar sites.

The Change Application relies on revised delivery routes, temporary works, and cannot be evaluated without axle weight data, structural capacity assessments, surveys, and 60 year serviceability modelling for construction, operation, maint

Residents cannot meaningfully assess the proposed changes while this foundational evidence remains undisclosed. The attached submission sets out the procedural basis for requiring this information before any change requests are examined.

Submitted by:

G. Yeadon

[redacted]

HUMAN-SCALE REFERENCE FIGURES (1.74 m) ADDED TO INDICATIVE ENGINEERING DRAWINGS

Submission Text (ready to transmit)

Purpose of Annex A This Annex provides two clarification visuals showing a **standard 1.74 m human-height reference figure** positioned adjacent to the **maximum structural heights** presented in *ES Volume 3 – Appendix 2.2: Indicative Engineering Drawings and Sections*. These visuals are supplied **solely to assist the Examining Authority (EA)** in understanding the real-world scale of the proposed structures.

Status of Material The figures in Annex A are **non-certified explanatory aids**. They **do not amend, replace, or alter** any certified engineering drawings, dimensions, or design parameters already submitted to the Examination. All structural measurements remain exactly as set out in Appendix 2.2.

Clarification Provided The added human-scale reference (1.74 m standard height) illustrates:

- The relationship between a typical adult height and the **maximum frame height of 3.50 m**.
- The relationship between a typical adult height and the **lower frame height of 2.85 m**.
- The visual impact of these structures when viewed at ground level.
- The proportional difference between human height and the solar support frames under both fixed-tilt and tracking configurations.

This clarification is intended to support the EA's assessment of **scale, massing, and human context**, particularly in relation to public perception and landscape considerations.

Reason for Submission During Examination, concerns have been raised regarding the ability of non-technical readers to interpret engineering dimensions in practical, human-scale terms. Annex A directly addresses this by providing **clear, accessible, real-world scale context** without modifying any certified design information.

Conclusion Annex A enhances transparency and supports informed decision-making by presenting the certified dimensions in a format that is immediately understandable to the EA and to members of the public. It is submitted at this Deadline to ensure the clarification is available for the next stage of Examination.

ANNEX A – HUMAN-SCALE REFERENCE FIGURES (1.74 m)

Clarification Visuals Supporting ES Volume 3 – Appendix 2.2

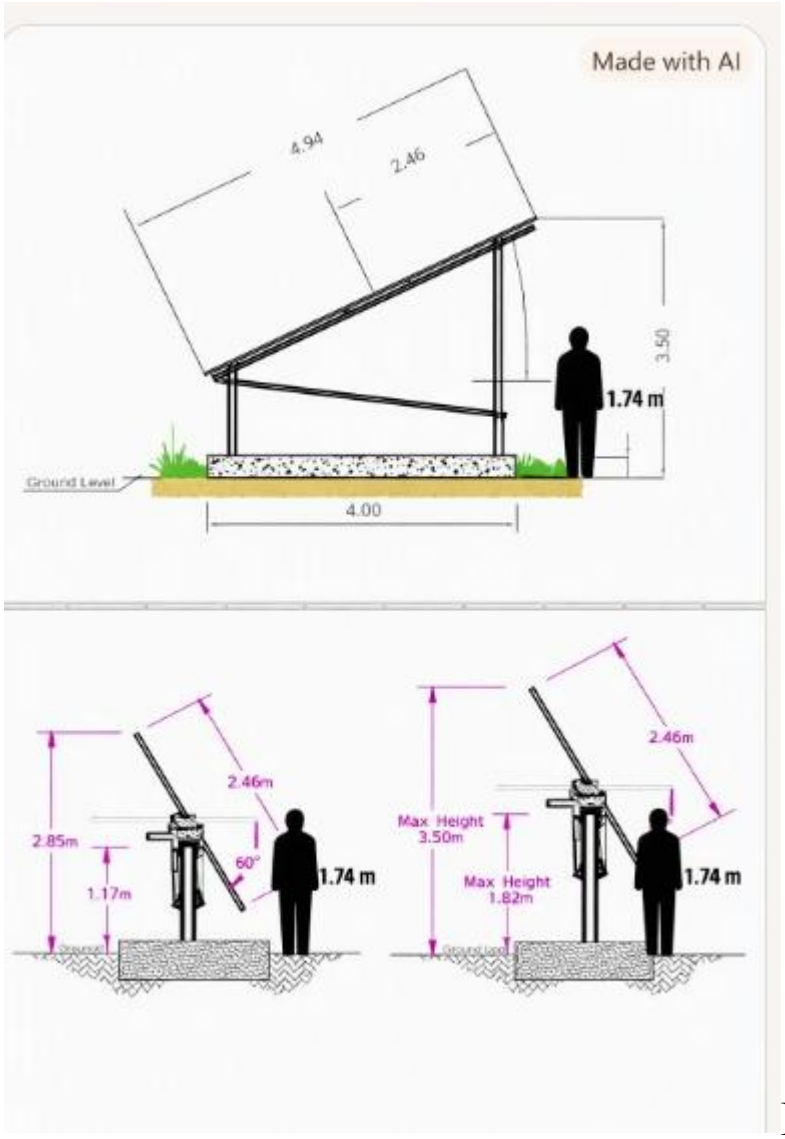
Purpose

This Annex provides human-scale reference figures (1.74 m standard height) positioned adjacent to the maximum structural heights shown in the Indicative Engineering Drawings. These visuals assist the Examinin Authority in interpreting real-world scale.

StatusThese figures are **non-certified explanatory aids**. They **do not amend or replace** any certified engineering drawings.

First Frame Shows – Fixed-Tilt Structure (Max Height 3.50 m)

Second Frame Shows – Tracking Structure (Max Height 2.85/3.5m)



Frame 1 And 2.

Frame 1 Top

Frame 2 Bottom

Clarification Provided

The added human-scale reference illustrates:

- Proportional relationship between human height and structural height.
- Ground-level perception of frame massing.
- Differences between fixed-tilt and tracking configurations.
- Real-world context for public interpretation.

Submission Note

This Annex is submitted to enhance transparency and support informed decision-making. All certified dimensions remain unchanged.

Prepared by:

Gary Yeadon— Resident and Interested Party 19 October 2026

Formal Submission to the Examining Authority

Subject: Request for Immediate Pause and Procedural Reset — Road Network Capability Evidence Required for Each LVS Site **From:** G. Yeadon **Date:** 20 October 2026

1. Purpose of This Submission

This submission requests that the Examining Authority **pause consideration of Light Valley Solar's (LVS) proposed Change Application** until the applicant provides **full, factual, site-specific road-network capability evidence** for every site within the scheme.

LVS has submitted nine proposed changes that directly depend on revised delivery routes, construction access, and long-term transport assumptions. However, LVS has **not provided the underlying road-loading evidence** that would allow residents, landowners, or the Authority to evaluate these changes.

It is procedurally impossible to assess LVS's change requests without this missing information.

2. Procedural Basis for the Request

LVS has relied on **undisclosed internal assessments** to generate its nine change requests. These include:

- New construction access routes
- Temporary culvert widening
- Temporary Dam Dike crossing
- Additional access points
- Revised delivery pathways
- Substation enlargement
- Land-take changes
- Habitat changes
- Expanded compulsory acquisition

Each of these changes **depends on road-network capability**, yet LVS has not provided:

- Axle-weight assessments
- Structural capacity checks
- Utility protection surveys
- Gradient and pinch-point analysis
- Culvert and bridge load ratings
- Swept-path analysis
- 60-year serviceability modelling
- Decommissioning access feasibility

Without this evidence, LVS's change requests cannot be meaningfully examined.

3. Required Reset: Break the Project Into Seven Site Packages

To restore procedural clarity, the project must be **deconstructed into seven independent site packages**, each containing:

Mandatory Site Package Components

1. **Site Road Plan**
    - Full mapping of every road segment used for construction, operation, maintenance, and decommissioning.
    - Classification, geometry, gradients, pinch points, blind bends.
    - Axle-weight limits and structural capacity.
    - Culverts, bridges, drains, watercourses.
    - Utility protection (water, gas, fibre, electricity).
    - Swept-path analysis for all vehicle types.
2. **Revised Delivery Specifications**
    - Vehicle types, weights, lengths, turning radii.
    - Frequency and timing of movements.
    - Temporary works (culvert widening, crossings, access points).
3. **60-Year Serviceability Assessment**
    - Road degradation modelling.
    - Heavy-plant access for replacement and removal of equipment.
    - Emergency access.
    - End-of-life decommissioning feasibility.

Only when each site package is complete can LVS's change requests be evaluated.

4. Why This Evidence Is Mandatory

A. The project has a 60-year operational life.

Roads must remain serviceable for:

- Construction
- Operation
- Maintenance
- Replacement cycles
- Decommissioning

LVS has not demonstrated that rural roads can support:

- 25–40 tonne vehicles
- Repeated heavy loads
- Long-term degradation
- End-of-life removal traffic

B. LVS's change requests rely on road assumptions.

The applicant claims “no new environmental harm,” yet the environmental assessments are **incomplete** and **unpublished**. The road-network evidence they relied upon to generate their changes has **not been disclosed**.

C. Residents cannot evaluate a moving target.

Nine changes, incomplete assessments, and shifting access routes create procedural instability. A reset is required to restore transparency.

5. Formal Request to the Examining Authority

I request that the Examining Authority pause consideration of Light Valley Solar’s Change Application and require the applicant to provide full, factual, site-specific road-network capability evidence for each of the seven sites before any change requests are examined.

This evidence must include axle-weight limits, structural capacity, utility protection, swept-path analysis, and 60-year serviceability modelling for construction, operation, maintenance, and decommissioning.

LVS cannot propose changes based on undisclosed assumptions, and residents cannot evaluate a project whose transport foundations have not been evidenced.

6. Closing Position

A project of this scale cannot proceed on **assumed road capability**. The evidence must be factual, complete, and site-specific. Until LVS provides this, the Change Application cannot be properly examined.

Respectfully submitted, G. Yeadon [redacted]