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30 June 2026

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Dear Sir/Madam,

Humberhead Solar

Thank you for consulting National Highways ("NH") for our comments on the Environmental Impact Assessment (EIA) Scoping Report, relating to the proposed development of the Humberhead Solar ("the Proposed Development").

The Project as set out within the Environmental Impact Assessment (EIA) Scoping Report is to construct and operate a solar farm that would generate electricity and transmit it to the existing National Grid Thornton Substation. The project consists of five sites that are located approximately 14km to the south-east of York and 23km to the north-east of Hull, to the west of Market Weighton and within the administrative area of the East Riding of Yorkshire.

It is noted from the map on the developer's website (<https://www.humberheadsolar.co.uk/>) that the proposed development does not encroach onto the Strategic Road Network (SRN). However, the proposed development does create the need for this review to ensure that the proposed development does not materially impact upon the capacity, operation and safety of the SRN, in this case the A64 and the M62/A63 Trunk Roads, all of which are located some distance to the north and south of the site.

Environmental Impact Assessment (EIA) Scoping Report

This Statutory Consultation on the Environmental Impact Assessment (EIA) Scoping Report, dated 26 May 2026, runs to 24 June 2026.

The submitted EIA Scoping Report sets out that the Proposed Development comprises the construction and operation of a ground mounted solar photovoltaic (PV) electricity generating station with a renewable electricity capacity of over 100MW. The proposed development includes a Battery Energy Storage System (BESS), landscaping, biodiversity enhancements, grid connection infrastructure and other works and equipment

necessary for the construction, operation (including maintenance), and decommissioning phases.

National Highways has reviewed the project red line boundary, and we are content that the proposed development does not cross or encroach on to NH assets or the SRN.

Construction Phase

Construction Programme

The EIA Scoping Report sets out that subject to development consent being granted for the Project, it is currently advised that the timing of construction activities will be detailed in the ES, and it is anticipated that the construction phase will take place over a period of up to 24 months.

Construction Hours

The EIA Scoping Report has advised that construction activities would be carried out 07:00 to 18:00 Monday to Friday and 08:00 to 13:30 on Saturdays. Working would not be permitted on Sundays or Public Holidays. We also note that if out of necessity some activities may be required outside of the core working hours (such as the delivery of abnormal loads, concrete pours for foundations, night-time working for cable construction works in public highways and HDD activities). The EIA Scoping Report sets that where possible; construction deliveries will be coordinated to avoid HGV movements during the traditional AM peak hour (08:00-09:00) and PM peak hour (17:00-18:00).

National Highways advises that as construction workers typically travel outside of the peak hours and as the site is in a rural location away from the SRN trips generated by construction workers will, based on the information currently provided, be distributed with minimal impact across the SRN and LRN.

Construction workforce

The EIA Scoping report has not provided any information on the predicted quantum of construction workers during the construction phase and due to this National Highways requests that this information is provided. This will enable us to understand the likely quantum of construction worker trips accessing the site and the likely impact on the SRN.

Construction Environmental Management Plans (CEMP)

National Highways notes from the EIA Scoping Report that an outline Construction Environmental Management Plan (oCEMP) will accompany the DCO application and describe the framework of mitigation measures identified in the ES to be followed and to be carried forward to a detailed CEMP implemented during the Scheme construction.

Construction Traffic Management Plan (CTMP)

The EIA Scoping Report advises an outline Construction Traffic Management Plan (oCTMP) will accompany the DCO application and describe construction logistics and construction worker travel, including information to guide the delivery of material, plant, equipment, and staff during the construction phase. This will provide a framework of mitigation measures to be carried forward to a detailed CTMP implemented during the Scheme construction.

These management plans will be secured via requirements of the DCO.

National Highways advise that based on our experience of solar farm schemes the construction phase usually has the greatest quantum of vehicle movements although once these are distributed across the network and at the times they are likely to be occurring they would normally be expected to have minimal impact on the SRN. However, we request that we continue to be consulted on this application as it progresses and especially with regard to any Abnormal Indivisible Loads using our network, for which the applicant will require our agreement and advice in using the SRN for these movements.

To ensure that the interests of the SRN are safeguarded, NH will seek an approval right in respect of the relevant DCO requirement which secures the CTMP. We recommend that the Applicant drafts the relevant DCO requirement to include NH as an approving highway authority with respect to matters concerning the SRN at the point of application submission to avoid the applicant incurring costs in defending against NH's stated position in examination and to ensure the appropriate highway authority has the benefit of the relevant approval right.

It should be noted that any abnormal loads would need to be approved via Electronic Service Delivery for Abnormal Loads (EDSAL) - <https://nationalhighways.co.uk/road-safety/abnormal-loads-and-the-esdal-system>.

Operational Phase

We understand from the EIA Scoping report that once the Project becomes operational it is expected to have an operational life of up to 60 years.

During the operation and maintenance phase of the Project, on-Site activities would be limited in extent. At this stage of the Scheme, it is anticipated that personnel will visit the Site from time to time to check the apparatus. No on-site staff will be required to operate the Scheme on a day-to-day basis. Movement within the Site will be by way of quad bike or small, farm utility vehicle. At times during operation, it will be required for additional staff to attend when necessary for ad hoc replacement of solar and BESS infrastructure. The ES will confirm the likely operational traffic flows.

The components of the scheme are anticipated to have the following lifespans:

- Solar Panels – 25 to 40 years; and
- Batteries – 15 to 20 years.

It is therefore estimated that the Solar Panels could require replacement once, and the batteries up to four times, during the life span of the Scheme. The effects of maintenance and replacement activities are anticipated to be lesser than the construction phase due to the Solar Panel Mounting Structures, On-site Cables, On-site Substation and other infrastructure already being in situ and not needing replacement. These activities would be controlled and managed through appropriate management plans and secured through the requirements of the DCO.

It is noted from the EIA Scoping report that HGV movements will be required to replace on-site equipment and that the ES will include further details of the maintenance and replacement activities with appropriate controls developed as part of the EIA process.

The EIA Scoping report sets out that an oOEMP will accompany the DCO application and will describe the framework of mitigation measures identified in the ES to be followed and to be carried forward to a detailed OEMP implemented during the Scheme operation. This will be secured via a requirement of the DCO.

As above, the management of the landscape and ecological features will be undertaken in accordance with the detailed LEMP.

Based on the above and National Highways experience we expect vehicle movements during the operational phase to be minimal and have no material impact on the SRN.

Decommissioning Phase

At the end of its operational life, it is advised that the Project would be decommissioned, and the decommissioning phase would be expected to take 12-24 months.

During the decommissioning phase, all the solar infrastructure including Solar Panels, Solar Panel Mounting Structures, above ground cabling, Conversion Units, Sub-distribution Switch Rooms, fencing, BESS and On-site Substations would be removed and recycled or disposed of in accordance with good practice following the waste hierarchy, with materials being reused or recycled whenever possible. All waste will be disposed of in accordance with the legislation at the time of decommissioning.

The underground ducting and joint bays associated with the cables will be decommissioned in accordance with the latest regulations and good practice at that time but are anticipated to be left in-situ to minimise adverse environmental effects. It may be possible to remove the cable itself by extracting it at the joint bays from within the ducting, so that the cable can be recycled.

Following decommissioning, the land within the Scheme will be returned to its original use as far as practicable as part of the decommissioning of the Scheme. Internal Access Tracks would be removed unless otherwise agreed with the relevant landowner at the time of decommissioning.

An outline Decommissioning Environmental Management Plan (oDEMP) will accompany the DCO application and describe the framework of mitigation measures identified in the ES to be followed and to be carried forward to a detailed DEMP implemented during the Scheme decommissioning. This will be secured via a requirement of the DCO.

Based on the above National Highways advises that vehicle movements during the decommissioning phase are usually less than the construction phase and therefore would normally have no material impact on the SRN. However, we welcome any forecasts of vehicle movements that the applicant can provide.

Protective Provisions

We advise that NH is a statutory undertaker and will require the Applicant to agree to its standard form protective provisions to safeguard the interests of the SRN and to ensure the protection of the public that use it.

We recommend that the Applicant's appointed legal advisors make contact with our legal team (LegalServicesInbox@nationalhighways.co.uk) at the earliest possible opportunity

to agree the provisions which will be included in the draft DCO at the point of submission of your application.

Please also note that pursuant to section 54A of the Planning Act 2008 and Regulation 12A of and Schedule 2 to the Infrastructure Planning (Fees) Regulations 2010 (as amended), NH is a prescribed public authority entitled to the recovery of its reasonable fees associated with any relevant service. These services cover all stages of the DCO process including pre-application consultation. The charging policy which NH applies can be found on our website - <https://nationalhighways.co.uk/our-roads/planning-and-the-strategic-road-network-in-england> .

National Highways welcomes further engagement with the applicant to discuss the DCO Application and its impacts on the SRN as the DCO progresses. Please note that these comments are provided on the basis of the information currently available to us and are made without prejudice to future advice and/or recommendations.

I trust this response is helpful, but should you require any further information please do not hesitate to contact me.

Yours sincerely,

[Redacted Signature]

Sent on behalf of

[Redacted Name]

Planning and Development

[Redacted Email] [@nationalhighways.co.uk](mailto:[Redacted Email]@nationalhighways.co.uk)