HELIOS RENEWABLE ENERGY PROJECT

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The Applicant's Responses to Relevant Representations

December 2024

Helios Renewable Energy Project

The Applicant's Reponses to Relevant Representations

Planning Inspectorate Reference: EN010140

December 2024

Prepared on behalf of Enso Green Holdings D Limited

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1. Introduction

1.1. Overview

1.1.1. This document sets out the responses from Enso Green Holdings D Limited (the 'Applicant') to the Relevant Representations submitted by Interested Parties in relation to the Development Consent Order Application (the 'DCO Application') for the Helios Renewable Energy Project (the 'Proposed Development').

1.1.2. The DCO Application was received by the Planning Inspectorate on 2 July 2024 and accepted for Examination on 30 July 2024. The period for registering as an Interested Party, through the submission of a Relevant Representation (RR), ran from 22 August 2024 to 30 September 2024. The RRs received were published on the Planning Inspectorate website on 10 October 2024.

1.1.3. A total of 351 RRs were received from Interested Parties.

1.1.4. A further three submissions were received late and accepted at the discretion of the Examining Authority. These comprise an additional submission from Burn Gliding Club (AS-003), and submissions from Anne Coe (AS-002) and Camblesforth Parish Council (AS-004).

1.2. Structure of this Document

1.2.1. This document provides responses from the Applicant to the matters raised in the RRs and is structured as follows:

- **Table 1.1 –** List of the RRs received from the Host Local Authority (North Yorkshire Council), Neighbouring Local Authorities and Parish Councils. These RRs have been broken down chronologically, verbatim, and are responded to in full through **Section 2.1** of this document.
- **Table 1.2 –** List of the RRs received from all other statutory consultees, national agencies, undertakers and elected representatives. These RRs have been broken down chronologically, verbatim, and are responded to in full through **Section 2.2** of this document.
- **Table 1.3 –** List of the themes in defined categories. The RRs under each theme are responded to within **Section 3** of this document.

1.2.2. References to the DCO Application documentation, as received by the Planning

Inspectorate on 2 July 2024, are provided in accordance with the referencing system as set out in the Planning Inspectorate's 'Helios Renewable Energy Project Examination Library'.

Table 1.1: List of organisations whose RRs are responded to in Section 2.1

PINS Reference	Acronym	RR received from
RR-050	CPC-XX	Carlton Parish Council
RR-142	HCWB-XX	Hirst Courtney and West Bank Parish Council
AS-004	CAPC-XX	Camblesforth Parish Council
RR-197	LCC-XX	Leeds City Council
RR-277	NYC-XX	North Yorkshire Council
RR-278	NYCH-XX	North Yorkshire Council Highways

Table 1.2: List of organisations in Section 2.2

PINS Reference	Acronym	RR received from
RR-039	BGA-XX	British Gliding Association
RR-043	BGC-XX	Burn Gliding Club
RR-072	CAA-XX	Civil Aviation Authority
RR-117	EA-XX	Environment Agency
RR-123	NGT-XX	National Gas Transmission
RR-143	HE-XX	Historic England
RR-190	KM-XX	Keir Mather MP
RR-266	NGET-XX	National Grid Electricity Transmission Plc
RR-267	NH-XX	National Highways
RR-268	NE-XX	Natural England
RR-272	NR-XX	Network Rail Infrastructure Limited
RR-280	NP-XX	Northern Powergrid (Yorkshire) LLP
RR-281	OFG-XX	Ofgem
RR-337	LMP-XX	The Land Management Partnership
RR-338	TWT-XX	The Woodland Trust
RR-345	HSA-XX	UK Health Security Agency

Table 1.3: List of themes in Section 3

Theme	Number of RRs	RRs categorised into and responded to through the Theme
Agricultural Land	233	RR-001, RR-002, RR-003, RR-004, RR-005, RR-007, RR-012, RR-014, RR-015, RR-017, RR-020, RR-021, RR-022, RR-025, RR-027, RR-028, RR-029, RR-030, RR-032, RR-033, RR-034, RR-035, RR-036, RR-037, RR-038, RR-041, RR-044, RR-046, RR-047, RR-049, RR-051, RR-052, RR-055, RR-056, RR-057, RR-058, RR-059, RR-060, RR-061, RR-067, RR-068, RR-069, RR-070, RR-073, RR-074, RR-076, RR-077, RR-078, RR-079, RR-080, RR-081, RR-082, RR-085, RR-086, RR-087, RR-089, RR-090, RR-091, RR-092, RR-093, RR-094, RR-095, RR-098, RR-099, RR-100, RR-101, RR-102, RR-103, RR-104, RR-107, RR-108, RR-109, RR-110, RR-111, RR-112, RR-116, RR-118, RR-119, RR-121, RR-122, RR-125, RR-126, RR-127, RR-130, RR-131, RR-132, RR-133, RR-134, RR-135, RR-136, RR-137, RR-138, RR-140, RR-141, RR-142, RR-144, RR-145, RR-146, RR-147, RR-149, RR-150, RR-152, RR-153, RR-154, RR-155, RR-156, RR-157, RR-158, RR-160, RR-161, RR-162, RR-163, RR-164, RR-167, RR-169, RR-170, RR-171, RR-172, RR-174, RR-177, RR-178, RR-179, RR-182, RR-184, RR-186, RR-187, RR-188, RR-189, RR-190, RR-191, RR-193, RR-196, RR-199, RR-201, RR-202, RR-203, RR-204, RR-205, RR-206, RR-207, RR-209, RR-210, RR-211, RR-212, RR-215, RR-216, RR-217, RR-218, RR-219, RR-220, RR-221, RR-222, RR-224, RR-226, RR-227, RR-228, RR-229, RR-231, RR-232, RR-233, RR-234, RR-237, RR-239, RR-240, RR-241, RR-243, RR-246, RR-247, RR-248, RR-249, RR-250, RR-251, RR-252, RR-253, RR-254, RR-255, RR-256, RR-257, RR-258, RR-259, RR-261, RR-263, RR-265, RR-270, RR-271, RR-274, RR-275, RR-276, RR-282, RR-283, RR-284, RR-285, RR-286, RR-288, RR-289, RR-290, RR-291, RR-292, RR-293, RR-294, RR-296, RR-297, RR-298, RR-299, RR-300, RR-304, RR-305, RR-306, RR-307, RR-308, RR-309, RR-312, RR-313, RR-316, RR-318, RR-319, RR-320, RR-322, RR-323, RR-324, RR-326, RR-327, RR-329, RR-330, RR-332, RR-333, RR-335, RR-336, RR-340, RR-341, RR-342, RR-346, RR-347
Air Quality	11	RR-019, RR-027, RR-050, RR-069, RR-115, RR-160, RR-201, RR-253, RR-276, RR-341 RR-351
Alternatives	161	RR-002, RR-003, RR-005, RR-008, RR-011, RR-012, RR-014, RR-015, RR-017, RR-022, RR-023, RR-025, RR-028, RR-029, RR-031, RR-032, RR-035, RR-036, RR-038, RR-042, RR-046, RR-047, RR-049, RR-052, RR-055, RR-060, RR-061, RR-062, RR-063, RR-067, RR-068, RR-069, RR-070, RR-073, RR-074, RR-076, RR-077, RR-078, RR-079, RR-080, RR-081, RR-085, RR-086, RR-089, RR-092, RR-095, RR-101, RR-103, RR-107, RR-108, RR-109, RR-110, RR-111, RR-112, RR-114, RR-116, RR-118, RR-121, RR-122, RR-125, RR-126, RR-128, RR-131, RR-132, RR-137, RR-138, RR-140, RR-141, RR-142, RR-144, RR-145, RR-146, RR-149, RR-150, RR-152, RR-157, RR-157, RR-158, RR-161, RR-162, RR-163, RR-165, RR-168, RR-170, RR-171, RR-173, RR-174, RR-178, RR-181, RR-184, RR-186, RR-187, RR-189, RR-191, RR-193, RR-195, RR-198, RR-199, RR-201, RR-202, RR-202, RR-203, RR-204, RR-209, RR-211, RR-214, RR-215, RR-219, RR-221, RR-223, RR-226, RR-229, RR-231, RR-232, RR-237, RR-241, RR-242, RR-245, RR-247, RR-247, RR-250, RR-251, RR-252, RR-253, RR-254, RR-256, RR-257, RR-258, RR-260, RR-261, RR-265, RR-270, RR-276, RR-282, RR-284, RR-285, RR-289, RR-290, RR-291, RR-295, RR-296, RR-297, RR-299, RR-300, RR-305, RR-308, RR-310, RR-312, RR-313, RR-314, RR-315, RR-317, RR-319, RR-320, RR-322, RR-323, RR-325, RR-327, RR-331, RR-350, RR-351

Biodiversity	181	RR-001, RR-002, RR-003, RR-004, RR-007, RR-008, RR-012, RR-013, RR-014, RR-017, RR-020, RR-025, RR-026, RR-027, RR-028, RR-034, RR-038, RR-040, RR-041, RR-044, RR-049, RR-051, RR-052, RR-054, RR-055, RR-060, RR-061, RR-065, RR-067, RR-068, RR-069, RR-073, RR-075, RR-076, RR-077, RR-078, RR-082, RR-083, RR-084, RR-085, RR-086, RR-090, RR-093, RR-100, RR-101, RR-102, RR-103, RR-105, RR-107, RR-108, RR-110, RR-112, RR-113, RR-118, RR-119, RR-121, RR-125, RR-126, RR-127, RR-128, RR-130, RR-131, RR-132, RR-136, RR-137, RR-138, RR-139, RR-140, RR-141, RR-142, RR-145, RR-146, RR-148, RR-149, RR-150, RR-152, RR-154, RR-155, RR-156, RR-160, RR-161, RR-162, RR-163, RR-164, RR-167, RR-170, RR-175, RR-176, RR-178, RR-179, RR-180, RR-181, RR-182, RR-184, RR-187, RR-190, RR-191, RR-192, RR-193, RR-195, RR-196, RR-199, RR-201, RR-202, RR-205, RR-207, RR-209, RR-210, RR-211, RR-212, RR-214, RR-215, RR-219, RR-222, RR-225, RR-226, RR-227, RR-228, RR-229, RR-233, RR-236, RR-237, RR-243, RR-244, RR-245, RR-246, RR-247, RR-248, RR-249, RR-252, RR-253, RR-255, RR-256, RR-257, RR-258, RR-259, RR-260, RR-261, RR-262, RR-263, RR-264, RR-270, RR-271, RR-274, RR-275, RR-276, RR-283, RR-284, RR-285, RR-287, RR-288, RR-292, RR-297, RR-298, RR-299, RR-300, RR-301, RR-302, RR-306, RR-307, RR-310, RR-311, RR-312, RR-313, RR-315, RR-316, RR-317, RR-318, RR-320, RR-321, RR-323, RR-331, RR-332, RR-333, RR-339, RR-341, RR-342, RR-344, RR-347, RR-348, RR-351
Climate Change	38	RR-002, RR-003, RR-017, RR-020, RR-044, RR-055, RR-061, RR-067, RR-068, RR-073, RR-103, RR-110, RR-114, RR-125, RR-137, RR-138, RR-140, RR-162, RR-163, RR-164, RR-169, RR-180, RR-181, RR-193, RR-199, RR-201, RR-209, RR-237, RR-244, RR-247, RR-257, RR-258, RR-276, RR-292, RR-300, RR-320, RR-322, RR-347
Consultation	38	RR-017, RR-019, RR-028, RR-032, RR-037, RR-050, RR-002, RR-003, RR-011, RR-026, RR-055, RR-056, RR-100, RR-103, RR-126, RR-136, RR-164, RR-174, RR-181, RR-190, RR-193, RR-204, RR-209, RR-212, RR-213, RR-226, RR-239, RR-244, RR-276, RR-300, RR-301, RR-317, RR-320, RR-323, RR-326, RR-330, RR-331, RR-351
Cultural Heritage	4	RR-048, RR-143, RR-222, RR-256
Cumulative Impact	107	RR-002, RR-003, RR-007, RR-011, RR-017, RR-044, RR-048, RR-050, RR-053, RR-054, RR-055, RR-056, RR-058, RR-061, RR-062, RR-067, RR-068, RR-069, RR-073, RR-076, RR-080, RR-082, RR-092, RR-093, RR-094, RR-096, RR-098, RR-100, RR-102, RR-103, RR-107, RR-111, RR-112, RR-114, RR-115, RR-119, RR-120, RR-135, RR-136, RR-137, RR-138, RR-139, RR-140, RR-141, RR-142, RR-144, RR-146, RR-147, RR-148, RR-149, RR-151, RR-152, RR-154, RR-155, RR-157, RR-159, RR-164, RR-170, RR-174, RR-177, RR-181, RR-186, RR-191, RR-196, RR-201, RR-209, RR-210, RR-211, RR-232, RR-243, RR-246, RR-251, RR-253, RR-256, RR-258, RR-265, RR-270, RR-273, RR-275, RR-276, RR-282, RR-283, RR-284, RR-285, RR-286, RR-287, RR-289, RR-295, RR-299, RR-300, RR-302, RR-306, RR-312, RR-314, RR-318, RR-320, RR-321, RR-322, RR-323, RR-324, RR-325, RR-329, RR-331, RR-339, RR-343, RR-346, RR-351
Design	27	RR-001, RR-017, RR-050, RR-055, RR-058, RR-067, RR-103, RR-105, RR-151, RR-156, RR-276, RR-295, RR-296, RR-329, RR-350, RR-068, RR-073, RR-078, RR-101, RR-136, RR-162, RR-194, RR-202, RR-213, RR-253, RR-316, RR-336
Glint and Glare	12	RR-007, RR-008, RR-019, RR-057, RR-077, RR-148, RR-201, RR-226, RR-256, RR-264, RR-273, RR-284

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Noise	115	RR-002, RR-003, RR-004, RR-005, RR-007, RR-012, RR-014, RR-017, RR-027, RR-038, RR-047, RR-048, RR-049, RR-050, RR-055, RR-057, RR-059, RR-067, RR-068, RR-073, RR-077, RR-081, RR-082, RR-090, RR-092, RR-098, RR-099, RR-100, RR-101, RR-102, RR-103, RR-104, RR-105, RR-107, RR-109, RR-112, RR-113, RR-119, RR-121, RR-125, RR-127, RR-130, RR-134, RR-136, RR-137, RR-138, RR-140, RR-142, RR-147, RR-148, RR-150, RR-154, RR-155, RR-160, RR-162, RR-163, RR-164, RR-166, RR-167, RR-174, RR-176, RR-179, RR-180, RR-182, RR-189, RR-192, RR-193, RR-196, RR-201, RR-202, RR-204, RR-205, RR-206, RR-209, RR-210, RR-214, RR-216, RR-221, RR-227, RR-229, RR-231, RR-236, RR-237, RR-240, RR-243, RR-246, RR-247, RR-253, RR-255, RR-256, RR-257, RR-258, RR-264, RR-265, RR-273, RR-275, RR-276, RR-284, RR-298, RR-300, RR-302, RR-305, RR-307, RR-311, RR-313, RR-320, RR-323, RR-324, RR-331, RR-333, RR-336, RR-339, RR-341, RR-347, RR-351
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Safety	115	RR-002, RR-003, RR-008, RR-009, RR-017, RR-027, RR-028, RR-036, RR-044, RR-049, RR-050, RR-051, RR-054, RR-055, RR-057, RR-059, RR-061, RR-064, RR-067, RR-068, RR-073, RR-076, RR-078, RR-082, RR-084, RR-090, RR-091, RR-092, RR-100, RR-101, RR-102, RR-103, RR-107, RR-110, RR-112, RR-119, RR-124, RR-125, RR-129, RR-130, RR-136, RR-137, RR-138, RR-140, RR-141, RR-145, RR-146, RR-147, RR-152, RR-161, RR-162, RR-163, RR-164, RR-166, RR-169, RR-174, RR-175, RR-176, RR-179, RR-180, RR-181, RR-182, RR-

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Socio-economics	190	RR-001, RR-002, RR-003, RR-006, RR-009, RR-010, RR-012, RR-016, RR-017, RR-018, RR-023, RR-025, RR-026, RR-027, RR-031, RR-033, RR-036, RR-038, RR-041, RR-044, RR-045, RR-048, RR-049, RR-051, RR-055, RR-056, RR-058, RR-059, RR-060, RR-061, RR-062, RR-066, RR-067, RR-068, RR-070, RR-071, RR-073, RR-075, RR-078, RR-080, RR-081, RR-083, RR-088, RR-089, RR-090, RR-091, RR-096, RR-097, RR-099, RR-100, RR-101, RR-102, RR-103, RR-104, RR-107, RR-109, RR-110, RR-113, RR-121, RR-125, RR-127, RR-128, RR-131, RR-133, RR-136, RR-137, RR-138, RR-139, RR-140, RR-142, RR-145, RR-146, RR-148, RR-152, RR-154, RR-157, RR-160, RR-161, RR-162, RR-163, RR-164, RR-165, RR-167, RR-170, RR-174, RR-175, RR-176, RR-178, RR-179, RR-180, RR-181, RR-182, RR-183, RR-185, RR-186, RR-187, RR-189, RR-190, RR-191, RR-192, RR-193, RR-194, RR-195, RR-196, RR-198, RR-199, RR-200, RR-201, RR-203, RR-204, RR-205, RR-206, RR-207, RR-208, RR-209, RR-210, RR-212, RR-213, RR-214, RR-215, RR-216, RR-217, RR-219, RR-221, RR-223, RR-225, RR-227, RR-229, RR-230, RR-231, RR-234, RR-236, RR-237, RR-238, RR-240, RR-241, RR-243, RR-244, RR-246, RR-247, RR-248, RR-249, RR-250, RR-251, RR-252, RR-253, RR-254, RR-255, RR-256, RR-258, RR-259, RR-262, RR-263, RR-270, RR-271, RR-273, RR-275, RR-276, RR-279, RR-284, RR-285, RR-288, RR-292, RR-294, RR-296, RR-298, RR-300, RR-301, RR-305, RR-306, RR-307, RR-308, RR-311, RR-312, RR-313, RR-319, RR-321, RR-323, RR-328, RR-332, RR-333, RR-334, RR-339, RR-340, RR-342, RR-344, RR-347, RR-349, RR-350, RR-351
Transport and Access	111	RR-002, RR-003, RR-004, RR-012, RR-014, RR-017, RR-020, RR-024, RR-027, RR-030, RR-036, RR-038, RR-041, RR-044, RR-050, RR-054, RR-055, RR-057, RR-060, RR-061, RR-067, RR-068, RR-069, RR-073, RR-075, RR-090, RR-093, RR-099, RR-100, RR-102, RR-103, RR-105, RR-107, RR-110, RR-130, RR-131, RR-134, RR-136, RR-137, RR-141, RR-142, RR-146, RR-147, RR-148, RR-149, RR-152, RR-153, RR-154, RR-157, RR-163, RR-164, RR-167, RR-175, RR-176, RR-178, RR-181, RR-182, RR-187, RR-189, RR-190, RR-192, RR-193, RR-196, RR-201, RR-202, RR-206, RR-207, RR-208, RR-209, RR-210, RR-212, RR-213, RR-214, RR-215, RR-226, RR-232, RR-233, RR-234, RR-243, RR-244, RR-247, RR-248, RR-249, RR-253, RR-256, RR-259, RR-264, RR-271, RR-273, RR-276, RR-282, RR-283, RR-284, RR-285, RR-288, RR-292, RR-298, RR-299, RR-300, RR-307, RR-312, RR-317, RR-320, RR-321, RR-324, RR-331, RR-332, RR-339, RR-341, RR-347, RR-350
Water Environment	78	RR-001, RR-002, RR-003, RR-008, RR-012, RR-014, RR-017, RR-019, RR-028, RR-044, RR-049, RR-055, RR-057, RR-061, RR-067, RR-068, RR-073, RR-076, RR-078, RR-092, RR-100, RR-102, RR-103, RR-105, RR-107, RR-112, RR-125, RR-127, RR-136, RR-137, RR-138, RR-139, RR-140, RR-146, RR-147, RR-153, RR-154, RR-162, RR-164, RR-190, RR-193, RR-194, RR-201, RR-209, RR-210, RR-212, RR-215, RR-220, RR-224, RR-232, RR-237, RR-244, RR-246, RR-247, RR-253, RR-255, RR-256, RR-273, RR-276, RR-283, RR-284, RR-285, RR-286, RR-300, RR-313, RR-320, RR-331, RR-333, RR-339, RR-347, RR-351

2. The Applicant's Responses to Relevant Representations

2.1. The Applicant's responses to the Host Local Authority, Neighbouring Local Authorities and Parish Councils

Table 2.1 – North Yorkshire Council [RR-277]

Reference	Theme	Issue Raised	Applicant's Response
NYC-01	Planning Policy	*The principle of the development in this location needs to be determined in accordance with National Policy Statements, Emerging National Policy Statements, the NPPF and the Development Plan for the area.* *The site falls within the Selby area of North Yorkshire Council. The Adopted Development Plan for this area comprises:* • *The Minerals and Waste Joint Plan (adopted 16 February 2022)- Policies S01, S02, S07, W01, W05* • *The Selby Core Strategy Local Plan 2013-Policies Sp1, SP2, SP12, SP13, SP15, SP16, SP17, SP18 and SP19* • *The Selby District Local Plan 2005-Policies ENV1, ENV2, ENV3, ENV4, ENV9, ENV12, ENV13, ENV16, ENV17, ENV27, ENV28, T1, T2, T8 AND CS6.* *The Emerging Development Plan for this location is: Selby District Council Local Plan publication version 2022 (Reg 19). On 17 September 2019, Selby District Council agreed to prepare a new Local Plan. Consultation on issues and options took place early in 2020 and further consultation took place on preferred options and additional sites in 2021. The Pre-submission Publication Local Plan (under Regulation 19 of the Town and Country Planning (Local Development) (England) Regulations 2012, as amended), including supporting documents, associated evidence base and background papers, was subject to formal consultation that ended on 28th October 2022. The responses have been considered and the next*	Noted, no response required.

Reference	Theme	Issue Raised	Applicant's Response
		stage involves the submission of the plan to the Secretary of State for Examination. *The Authority will set out all relevant policies as they relate to the application in the Local Impact Report. While national and local policies are broadly supportive of low carbon and renewable energy proposals in principle, the local environmental impacts of the proposals need to be given full and careful consideration.*	
NYC-02	Environmental Health - Air Quality	*The potential for amenity impacts during the construction phase is acknowledged and mitigation measures will be incorporated into the outline Construction Environmental Management Plan (CEMP) as an Appendix to the Environment Statement (ES). Construction compound(s) are proposed within the site adjacent to the site entrance. I would recommend that consideration is given to safeguarding the amenity of existing sensitive receptors when siting construction compound(s).* *Operational Phase Effects arising from vehicular use during the operational phase are expected to be negligible and therefore will result in a negligible impact on air quality. Five LGV movements per month are projected for maintenance purposes.* *Overall, I would concur with the scoping out of operational air quality impacts, and that amenity impacts could/should be mitigated through a CEMP.*	Due consideration has been given to the location of the construction compounds with regards to sensitive receptors. Amenity impacts will be mitigated through the CEMP, secured via Requirement 4 of the DCO.
NYC-03	Noise and Vibration	*A 12-month construction phase is expected for this project. Potential significant impacts have been assed appropriately. An outline Construction Environmental Management Plan (oCEMP) is provided (Appendix 5.1) which commits to a communication strategy with neighbouring residents throughout the duration of works to provide updates on the construction programme (4.9). Overall, taking into account the aforementioned, there are no objections relating to*	Noted, no response required.

Reference	Theme	Issue Raised	Applicant's Response
		construction noise/vibration impacts so far as this department's interests are concerned. *Operational plant noise is assessed using BS4142:2014+A1:2019 methodology. Existing sound levels are determined using statistical analysis of measured LA90,T values and presented in Appendix 11.1: Time History and Statistical Analysis Graphs. The report also considers cumulative operational noise impacts with other ongoing development nearby, including East Yorkshire Solar Farm and Drax BECCS NSIPs, and predicts no adverse impacts (i.e. a Rating Level exceeding background sound levels by ?5dB). Operational vibration impact has been scoped out on the basis that solar farms are not known to vibrate significantly. Overall, taking into account the aforementioned, there are no objections relating to operational noise/vibration impacts so far as this department's interests are concerned.*	
NYC-04	Air Quality	*Construction air quality mitigation measures are assessed concluding a 'medium risk' of impacts during earthworks and a 'low risk' of impacts for trackout. Consequently, a series of best practice mitigation measures are recommended for inclusion within a Dust Management Plan (DMP), which is proposed within the oCEMP (5.46) alongside a monitoring regime. Overall, taking into account the aforementioned, there are no objections relating to construction air quality impacts so far as this department's interests are concerned.*	Noted, no response required.
NYC-05	Biodiversity	*The overall approach to assessment for biodiversity is supported, including use of the CIEEM guidelines for Ecological Impact Assessment (EcIA). Ongoing consultation with the local authority and Natural England with regards to the scope of surveys is noted and welcomed. There has not been time to review all of the ecological documentation provided to inform the relevant*	The Applicant notes that NYC supports the overall approach to assessment for biodiversity. The Applicant is continuing to liaise with NYC and Natural England in respect of these matters.

Reference	Theme	Issue Raised	Applicant's Response
		representation, however the general approach to avoiding or minimising impacts through the detailed design of the construction is welcomed retaining key habitat features including woodland, hedgerows, ponds, mature trees and ditches. *The outline Landscape and Ecological Management Plan (oLEMP), BNG metric and Biodiversity Impact Assessment have not yet been reviewed, but there is an expectation that BNG will be delivered on site through the creation of new habitats of high ecological value, including wildflower grassland, wetland meadow creation, pond/wetland scrape creation, hedgerows, woodland belts, and scrub planting.*	As set out in ES Chapter 8 Biodiversity **[APP-028]**, the Proposed Development includes significant habitat enhancement provisions; these will be managed for the benefit of wildlife over the long term and will provide biodiversity gains for a wide variety of species. Additionally, the proposed creation of diverse grasslands, tree planting and hedgerow planting will deliver a quantifiable biodiversity benefit. The LEMP will be secured by DCO Requirement 10, as indicated in the dDCO **[AS-007]**.
NYC-06	Heritage	*I have reviewed the revised Cultural Heritage chapter (Chapter 6; June 2024) and Cultural Heritage Technical Appendix (Appendix 6.1) with regards to the impact of the proposal on heritage assets of archaeological interest. I am pleased to see that the use of the term 'non-designated heritage asset' has now been properly defined in-line with the Government guidance (paragraphs 6.3.4-6.3.5 and Table 6.4). The chapter and associated appendix have also been updated following inspection of original aerial photographs held by North Yorkshire Archives (Table 6.4). These two points address my previous concerns with the assessments at the Statutory Consultation stage. As set out in the Cultural Heritage chapter I have been kept informed of the results of archaeological field evaluation and have been in frequent liaison with the applicants archaeologist to secure a mitigation solution which combines areas of physical preservation with archaeological recording in a manner proportionate to the significance of the archaeological heritage assets. Given the above, I can confirm that the archaeological*	Noted, no response required.

Reference	Theme	Issue Raised	Applicant's Response
		potential of the site has been appropriately assessed and the mitigation strategy is suitable.	
NYC-07	Landscape and Visual Effects	*The comments from the Landscape consultant should be taken into consideration in assessing the projects Landscape and Visual Impacts and a Landscape and Visual Impact assessment and report should be included in the ES including Cumulative effects. We have had several meetings with the developer's representative towards developing the overall landscape strategy for the site and we would be happy to continue in this process. The main submission documents seem broadly in-line with those previously seen but we would wish to review additional new information submitted in more detail and to clarify the correct number and title of documents submitted as there seems to be some document / plan referencing miss-match.*	The Applicant has resubmitted the Landscape figures which were previously incorrectly labelled **[PDA-009 to PDA-020]**. The remaining Landscape figures **[APP-076 to APP-087]** and appendices **[APP-134 to APP-143]** were correctly labelled in the original submission and hence have not been resubmitted. Applicant will continue to work closely with NYC in the review of any application documents
NYC-08	Landscape and Visual Effects	*There are several areas where we have concerns and we would wish to review and consider in more detail now that the LVIA has reached a more developed stage and in-light of the recently updated National Policy Statements and NSIP Advice Pages relating to energy infrastructure, renewable energy and cumulative effects:* • *Cumulative effects; particularly due to the number of major schemes focused around Drax Power Station and the Grid connection point; potential to envelop the settlements of Camblesforth and Drax villages, ongoing erosion of the landscape baseline.*	Cumulative effects are addressed in Section 7.8 of Chapter 7 of the ES **[APP-027]**. The NPSs do not prescribe an approach to cumulative assessment but state that potential for cumulative effects must be considered. The inclusion of a cumulative assessment within the ES therefore demonstrates compliance with the NPSs. The updated NSIP Advice Note (which is guidance) is dated September 2024, after the DCO application was submitted. However, the LVIA is broadly compliant with the updated NSIP Advice Note. The LVIA does consider the list of cumulative schemes that was presented to the Council during the pre-application stage but does not specifically consider opportunities to develop holistic mitigation strategies with other organisations, including developers. However, the applicant considers that the Project

Reference	Theme	Issue Raised	Applicant's Response
			incorporates a sufficiently robust landscape strategy to mitigate potential landscape and visual effects.
NYC-09	Landscape and Visual Effects	• *Green Infrastructure Strategy and the development of a sufficiently robust landscape framework capable of offsetting the wider cumulative effects and ongoing erosion of the landscape baseline; wider connectivity of the site; in-line with principles of the Natural England's GI Framework.*	It is considered that the Landscape Strategy for the Site responds to relevant guidance on Green Infrastructure. The landscape strategy is outlined in Section 7.5 of ES Chapter 7 **[APP-027]**, with further detail provided in Figures 7.19 to 7.26 **[APP-088 to APP-095]**. In addition, Appendix 7.9 Outline Landscape and Ecological Management Plan **[APP-143]** provides information on proposed vegetation establishment, maintenance and management and is secured as a Requirement in the dDCO.
NYC-10	Landscape and Visual Effects	• *Local landscape and visual effects in proximity and within the site, including local roads, footpaths and PROW; in-light of potential significant effects identified thought the updated LVIA and photomontages.*	Local roads, footpaths and PROW have been considered in the preparation of the Landscape Strategy for the Site, as set out in paragraph 7.5.5 of ES Chapter 7 Landscape and Views **[APP-027]**.
NYC-11	Landscape and Visual Effects	• *Long-term maintenance and management; including arrangements to secure off-site landscape mitigation and GI.*	Appendix 7.9 Outline Landscape and Ecological Management Plan **[APP-143]** provides information on proposed vegetation establishment, maintenance and management within the Site.
NYC-12	Transport and Access	*Highways* *Within the submitted documents the developer has said all vehicles will enter and leave the site by two proposed junctions on A1041 county road north of Camblesforth. It would appear a practical solution but the Local Highway Authority (L.H.A) reserve judgement until the detail designs are prepared*	Noted, no response required.
NYC-13	Land Contamination	*The Authority has little concern with application as it relates to land contamination.*	Noted, no response required.

Reference	Theme	Issue Raised	Applicant's Response
NYC-14	Transport and Access	*The developer has recognized that the construction phase of the project will cause the most congestion and the L.H.A expects the developer to manage this phase of the project with care resulting in the least disruption to residents and the travelling public. The delivery corridor vehicles will take to access the site is acceptable and has been suggested for other similar projects close to the site. Although clearly programming of each approved project will be needed to avoid congestion on the network. The transport assessment should include such projects and suggest ways each developer shall interact to reduce their combined impact on the highway network. A Programme of the site construction works will need to be considered by the L.H.A to ensure any clash of works have been resolved. The developer should be aware that any work on the highway will need consultation with the authority on such matters as informing the public and street work approval in connection with implementing the two access points. which will need to be prepared by the developer. The Authority sees this being included in the D.C.O.*	It is not possible to provide a programme at this stage notwithstanding the indicative programme set out in Section 5.2 of ES Chapter 5 **[APP-025]**, as this will be dependent on a number of factors. The oCTMP **[AS-006]** includes measures to minimise the impact resulting from construction activities. These will be secured through the detailed CTMP via Requirement 6 of the DCO, which will be agreed with the LHA prior to construction commencing. The Applicant will continue to liaise with NYC about their concerns.
NYC-15	Lead Local Flood Authority	*The Authority acknowledges the application and will provide further details during its assessment as part of the Local Impact Report. In general terms the design of photovoltaic (PV) panels means that the area represented by the proposed panels is not considered impermeable, as the ground beneath all panels will be grassed and as such remains permeable.*	The assessment of the effect of the Proposed Development on surface water runoff is set out in Section 5 of the Flood Risk Assessment (FRA) **[APP-232]**. The approach set out by the LLFA is consistent with the approach taken in the FRA **[APP-232]**. We await additional comments on surface water management as part of the Local Impact Report (Deadline 2 Monday 13 January 2025).
NYC-16	Public Health	*The Authority has had several meetings with the applicant since the Statutory consultation in an attempt to resolve concerns raised at that stage. The Authority remains concerned that Public Health has*	A stand alone chapter on human health was scoped out of the Environmental Statement ("ES") as agreed with the Planning Inspectorate in their Scoping Opinion

Reference	Theme	Issue Raised	Applicant's Response
		not been adequately scoped into the assessment. Key concerns relate to: • *Assessment of vulnerable populations* • *Cumulative impacts and assessment of cumulative 'minor impacts'* • *A Lack of baseline data, specifically with regard to mental health and wellbeing.* • *Absence of consideration of the impacts upon the population in relation to both mental and physical health and wellbeing.* • *The 100% leakage rate as it relates to the external workers being brought to site.* • *Additional demand on accommodation and services.* • *The Authority will expand upon these issues at the Local Impact Report stage.*	**[APP-112]**. The Applicant has however addressed the matters referred to by NYC on previous occasions as outlined below: *Assessment of Vulnerable Populations* Chapter 2 of the Population and Human Health Technical Note (Appendix 2.6 **[APP-118]**) provides a baseline review of the local population including identification of potentially vulnerable groups and receptors including the elderly, Educational facilities, Healthcare services, Care homes, Retirement homes, and Religious amenities and how these may be impacted by the Proposed Development. Chapter 3 of the Technical Note goes on to provide a summary of the potential effects identified in the ES and confirms that no significant effects to population groups were identified. *Cumulative Impacts* Each technical chapter within the ES includes a summary of cumulative effects, which are subsequently summarised in Chapter 15 Cumulative Effects **[APP-035]** which addresses both inter- and intra-project effects. The chapter discusses intra-project effects that may be relevant to the health and wellbeing of users of public rights of way ("PRoW"), such as the combined effect of noise disturbance and the visual effect of construction

Reference	Theme	Issue Raised	Applicant's Response
			and decommissioning activities, concluding that any adverse effects would be short term, temporary and not significant. It also considers the combined effect of noise disturbance (from plant), visual impacts and glint and glare on users of PRoW during operation of the Proposed Development, concluding that landscape planning proposals and the noise mitigation which is incorporated into the Proposed Development's design means that significant intra-project effects are not anticipated. The only significant cumulative effects are identified in relation to landscape (adverse), biodiversity (beneficial) and socio-economics (beneficial). Though it is not anticipated the adverse cumulative landscape effect is significant in health terms. *Baseline Data* Section 2 of the Population and Human Health Technical Note (Appendix 2.6 **[APP-118]**) provides a thorough review of the baseline health conditions of the local areas include both mental and physical health. Chapter 3 of the Technical Note goes on to describe the human health effects of the Proposed Development. Overall, the baseline review identifies that the Local Super Output Area Selby 008A demonstrates an area that ranks 17,993 out of 32,844 LSOAs (where 1 is the most deprived), within the 50% least deprived neighbourhoods nationally. Of the indicators, Selby 008A ranks best for health deprivation and disability,

Reference	Theme	Issue Raised	Applicant's Response
			crime and living environment, and ranks worst for barriers to housing and services. Furthermore, Selby is identified as performing better in relation to physical and mortality statistics, and mental health and behavioural risk factors (with the exception of estimated dementia diagnosis and Year 6 prevalence of obesity (10-11 years)) than the region of Yorkshire and the Humber and England. It is also noted that access to the existing PRoWs will be maintained through all phases of the Proposed Development and should temporary closures be required to ensure the safety of PRoW users, these will be for a short period during construction and decommissioning and alternate routes will be provided. The Proposed Development will also provide additional, permissive footpaths during the operational lifetime of the Proposed Development, so as to formalise access routes between PRoWs on-site and therefore encourage use of the site by pedestrians, cyclists and equestrians. The Proposed Development will also not have any significant adverse effect on the local play and sports facilities identified in Chapter 2 of the Technical Note. Chapter 3 of the Technical Note also considers noise and vibration and the findings of ES Chapter 11 – Noise and Vibration [APP-031] in the context of health *Absences of consideration of impacts* As described above, a thorough baseline review is provided which informed the assessment of Population and Human Health effects relating to the Proposed

Reference	Theme	Issue Raised	Applicant's Response
			Development, as identified in Table 3.1 no significant adverse effects identified during the construction, operation, or decommissioning in relation to population and human health. *100% Leakage Rate* The Population and Human Health Technical Note (Appendix 2.6 **[APP-118]**) has considered potential health impacts during construction and did not identify any significant adverse effects during the construction of the Proposed Development in relation to population and human health. Is it also noted that ES Chapter 13 – Socio-Economics **[APP-033]** assessment of the potential socio-economic effects of the construction and decommissioning phases of the Proposed Development assumes that up to 200 construction worker roles will be sourced from outside of the Yorkshire and The Humber area. It is noted however that this is a 'worst-case' scenario and as described in Table 13.1 of ES Chapter 13, until a contractor is appointed, it is not known where the labour will be sourced from. It is a realistic, yet worst-case scenario for assessing employment effects to assume that the labour will not be sourced from within the wider study area. It is noted in ES Chapter 13 that an Employment and Skills Plan **[APP-170]** has been produced at Appendix 13.1 of the ES to demonstrate the Applicant's commitment to supporting employment and upskilling opportunities in the local area and the mechanisms that will be used to facilitate this.

Reference	Theme	Issue Raised	Applicant's Response
			Additional demand on accommodation and services Chapter 13 Socio-economics **[APP-033]** has considered the worst case additional demand during the construction period in relation to accommodation and services, assuming all workers are sourced from outside the Wider Study Area (100% leakage as agreed by NYC) under Effects on Local Amenity, which identified a negligible to minor adverse (not significant) effect. A discussion of the impact of the development on accommodation and health and social care services can also be found at Chapter 3 of the technical note.
NYC-17	Public Rights of Way	*The Authority will expand upon the assessment of Public Rights of Way during the Local Impact Report. Any temporary disruption to the network must be done in accordance with North Yorkshire Council requirements which should be accounted for in the DCO either directly or through the use of a management plan secured by the DCO.*	Proposed management measures for the PRoWs are set out in paragraph 7.2, points (i) and (ii)) of the submitted oCTMP **[AS-006]**. Additionally, a Public Rights of Way Management Plan will be implemented, which will be secured by Requirement 12 of the DCO.
NYC-18	Agricultural Land	*There has been significant concern about the use of BMV land for this project and the Council would encourage further discussion to better understand the choices for land take including options appraisals and mechanisms used.*	Paragraph 2.6.21 to 2.6.25 of the Alternative Site Assessment (ASA) [APP-227] set out the justification for the use of provisional Grade 2 agricultural land. As shown in Figure 2.7 of the ASA, the majority of the land within a 5km radius of the point of connection is either Grade 1 or Grade 2. The Grade 3 land within the 5km radius is not available for development due to existing uses and planning applications in these areas.
NYC-19	Community Benefit Contribution	*There are a number of places throughout the application in which a community Benefit Contribution could help mitigate the effects, not least the effects identified in the public health chapters. We would*	The Applicant is open to providing community benefits, however, this is not a material planning consideration and as such will be considered should the DCO be granted.

Reference	Theme	Issue Raised	Applicant's Response
		welcome the opportunity to discuss the process further as we note at this point that the contribution is being considered.	

Table 2.2 – North Yorkshire Council – Highways [RR-278]

Reference	Theme	Issue Raised	Applicant's Response
NYCH-01	Transport and Access	*A Transport Assessment (TA) has been submitted that provides an overview of the likely traffic impact arising from the proposed development and the routes that construction and worker traffic would take. It is accepted that once operational solar farms typically generate relatively few traffic movements and the transport effects are going to be the greatest during the construction period and any subsequent decommissioning. In addition to the Transport Assessment an outline Construction Traffic Management Plan (CTMP) has been provided and a number of traffic surveys were taken on roads surrounding the site in March 2022.*	Noted, no response required.
NYCH-02	Transport and Access	***Construction Vehicle Route*** *Access to the site would be located off the A1041 and the route for construction traffic identified from the M62 would be via A614, A645 and A1041. It is accepted through the CTMP the applicant should be able control routing to the site and restrict construction traffic to this route but further details on how this process will be managed, including what monitoring and enforcement would take place during the development to ensure drivers continue to use the identified route should be provided.*	The following measures are set out in the submitted oCTMP **[AS-006]**: • Signs to direct construction vehicles associated with the development will be installed along the construction traffic route. Delivery drivers, contractors and visitors will be provided with a route plan in advance of delivering to Site to ensure that vehicles follow the identified route (paragraph 7.2, point (vi)). • All signage on the designated route will be inspected daily by the Site Manager, to ensure they are kept in a well-maintained condition and located in safe and appropriate locations (paragraph 7.2, point (vii)). • Any unforeseen issues that arise in relation to construction vehicle movement will be logged by the Site Manager. If necessary, the issues will be discussed with the local highway authority so that

Reference	Theme	Issue Raised	Applicant's Response
			they can be resolved as appropriate (paragraph 7.2, point (xxiv)). A detailed CTMP will need to be completed and agreed as DCO Requirement 6. Further details of monitoring and enforcement can therefore be provided as part of that if necessary.
NYCH-03	Transport and Access	*From the M62 the A Roads identified are all two way single carriageway roads, with average daily traffic volumes of between 7000 and 12500 vehicles. All carry a significant volume of HGV's ranging between 6-8% of the daily total. Although there have been a number of injury accidents on this route in the last 5 years, the majority have been slight injuries, some 22 slight and 6 serious injuries recorded. There does not appear to be a particular pattern or specific location and cluster of accidents or highway safety issue identified on analysis of the accident record. In addition to the route identified above, Hardenshaw Lane a minor unclassified rural lane would also be used to access part of the site. A number of road crossing points would also be required, all of these are on the minor road network.*	Noted, no response required.
NYCH-04	Transport and Access	***Trip Generation*** *A trip generation exercise had been undertaken considering the traffic movements associated with the grid connection/cable route and the non-grid connection element of the development, which consists of delivery of the solar modules, mounting structures, transformers, and access track construction. It is expected the majority of deliveries will be undertaken by 16.5m articulated vehicles or 8-10m rigid vehicles. It is noted in addition there will also be a small number of abnormal load movements required. Whilst daily numbers of HGV movements will vary the applicant has indicated it will be a relatively flat profile for deliveries and through*	As set out in Table 4.2 of the submitted CTMP **[AS-006]**, there are forecast to be up to 79 vehicles per day associated with the construction workers. These could originate from a number of locations and would therefore be spread across the highway network. They would also likely operate shift patterns that mean they are spread over a larger period of time. There will therefore be no material impact on the local highway network as a result of these trips. Notwithstanding the above, using a precautionary assumption that all workers arrive in the AM peak hour

Reference	Theme	Issue Raised	Applicant's Response
		CTMP they will look to avoid travel during the peak network hours where possible. The construction programme is expected to last approximately 12 months. During the construction phase a total of 6756 HGV trips will be required for the Solar Farm and 2400 HGV trips for the Grid Connection works. On average that would equate to 26 HGV daily trips associated with the Solar Farm and 10 HGV's for the Grid Connection. To allow for possible peaks during the construction period, a 50% uplift has been applied to model trips for a peak day, this would equate to 38 HGV trips for the Solar Farm and 14 HGV's for the Grid connection. Allowing for HGV movements on a peak day, some 52 trips (26 arrivals and 26 departures) would result in a percentage increase in HGV traffic on the A614 of 5%, the A645 9% and the A1041 6%. It has been estimated the proposals could generate up to 200 direct full time jobs during the construction phase with an additional 10 workers on the grid connection element. There is an expectation that as part of Travel Planning for the site, provision would be made for a shuttle bus to help bring workers to and from site. With other travel planning measures such as car sharing an estimation of 158 trips would be generated by workers travelling throughout the day. This estimate of staff movements appears reasonable but does rely on a successful bus shuttle service being implemented that would transport a large percentage of workers to the site. As with the HGV construction traffic there is an expectation that shift patterns could be introduced that allow many of these movements to be outside typical peak network hours of 8-9am and 5-6pm. Combining the expected HGV traffic and worker movements on a peak day the total number of trips generated by the site would 210. On an average day the figure is expected to be slightly lower due to a lower number of HGV movements. However the 210 trip figure would represent a percentage increase in total daily traffic flows of between 1 and 3% on the A614, A645 and A1041. The TA has allowed for all worker	and depart in the PM peak hour, there are forecast to be 79 arrivals in the AM peak and 79 departures in the PM peak. This equates to just over one vehicle per minute on average, which would not result in any material impact on the highway network, especially when considering that this would split across various routes and is only for a temporary period of time.

Reference	Theme	Issue Raised	Applicant's Response
		related trips to use the same route identified for construction traffic, from the M62 to the site accesses located on the A1041. However given the proximity of the site to Selby it would be expected that some worker trips are likely to use a different route and an allowance should be made for this in the TA and CTMP.	
NYCH-05	Transport and Access	*Of the 210 daily trips generated by the proposal a percentage of these will use the minor road Hardenshaw Lane for a short length. Hardenshaw Lane currently carries relatively few vehicles and a very small number of HGV's and therefore the percentage change as a result of development trips would be a significant increase.*	The low existing flows mean that the percentage increase as a result of the development will inevitably be high. However, this does not mean that there are any significant effects, and the submitted ES Chapter 10 Transport and Access **[APP-030]** shows that there will be no significant effects in relation to Hardenshaw Lane.
NYCH-06	Transport and Access - Cumulative Impact	***Cumulative Impact with other Developments*** *There are a number of other committed developments in close proximity to this site and many would impact on the same roads as the identified construction route for this site, the A614, A645 and A1041. Allowing for possible additional traffic flows from other developments the percent increase in daily traffic flows on these roads with this development added would result in a more significant percentage increase, up to 15% on the A645. However this would be a worst case scenario assuming all developments are built out at the same time whereas the expectation is that there will be some overlap between schemes and some even taking place at different times. It should also be noted that this site along with some of the other committed developments, the increase in traffic is largely limited to a short term construction period and decommissioning event rather than a permanent increase in traffic flows. It is therefore accepted the increase in traffic volumes generated by the proposal, with the measures and mitigation proposed in the outline CTMP and Travel Planning, can be accommodated on the three main roads the*	Noted, no response required.

Reference	Theme	Issue Raised	Applicant's Response
		A614, A645 and A1041 identified for the construction vehicle route. The number of trips generated by the decommissioning phase is not expected to exceed the numbers indicated for the construction phase. During the operation phase it is estimated there would be less than 10 trips per month for maintenance purposes.	
NYCH-07	Transport and Access	***Site Access Points*** *It is proposed for the site to have two main access points direct from the A1041, both accesses would be used by HGV construction traffic and staff movements with total trips split evenly between the 2 accesses. Both accesses are proposed as simple priority junctions and based on the number of daily trips expected and direction of travel to and from the site, ie mostly left turn in and right run out, such junctions are expected to operate satisfactorily. However it is recommended that junction capacity modelling be undertaken on the proposed A1041 accesses to confirm the suitability of a priority junction and allow for an element of worker trips arriving and leaving to the North of the site. Both accesses would have visibility splays that meet the requirements set out in Design Manual for Roads and Bridges and an initial road safety audit has not highlighted any specific safety concerns.*	The level of traffic associated with the site during construction is below the level at which capacity assessment is typically necessary. Notwithstanding this, capacity assessments for each of the site access points have been undertaken and the results will be shared with NYC Highways for their information. This is based on a robust assessment, assuming all worker vehicles arrive and depart in both directions during each peak period (i.e. effectively quadrupling the actual forecast movements) and even this does not show any issues with the operation of the junctions, with significant spare capacity remaining.
NYCH-08	Transport and Access	*Access to the wider site will be via internal access tracks and sections of some minor unclassified roads, Jowland Winn Lane, Hardenshaw Lane, and Sandwith Lane. Some 25% of the daily trips are expected to use a short section of Hardenshaw Lane/Sandwith Lane to access the southern area of the site. Both these lanes are relatively narrow, have unrestrained edges and are unlikely to have a substantial road construction depth or strength. The applicant has accepted that whilst both lanes currently carry relatively low volumes of traffic, appropriate passing places and carriageway widening should be provided to accommodate the expected*	Noted, no response required.

Reference	Theme	Issue Raised	Applicant's Response
		increase in vehicle movements as a result of the development. There may also need to be an element of strengthening to the road edges to ensure the numbers of HGV's can be accommodated. It is recommended that condition surveys are undertaken and a detailed design for the road widening and passing places be submitted and brought into use before any development traffic uses these lanes. It is accepted the existing highway extents on Hardenshaw Lane/Sandwith Lane would allow for the improvements and construction of widening and passing places.	
NYCH-09	Transport and Access	*There are also a number of locations where the internal access tracks will need to cross some of the unclassified roads within the site boundary. Whilst available visibility splays at each crossing point varies it is agreed that traffic flows and speeds are low and that with appropriate traffic management and the use of banksmen these crossing points could operate safely and not delay or prevent access by current users of the road network. It is accepted that suitable construction compounds can be provided within the development site that would allow materials and vehicles to be kept clear of the highway and provide appropriate turning areas for HGV's.*	Noted, no response required.
NYCH-10	Transport and Access	*Subject to the applicant undertaking capacity modelling of the proposed A1041 access points, updating the CTMP and providing the proposed offsite highway works detailed, in principle there are no local highway authority objections to the proposed development.*	See responses to NYCH-02 to NYCH-07.

Table 2.3 – Leeds City Council [RR-197]

Reference	Theme	Issue Raised	Applicant's Response
LCC-01	Consultation process	*Leeds City Council is neighbouring authority to the project. The applicant advised the Local Planning Authority that their project had been accepted for examination on 21 August 2024. We have no record of having been consulted on the project at the pre-acceptance stage or before this. Please correct us if we are wrong and provide a copy of any correspondence. It is unlikely that we will participate in the examination however, we are registering our interest in the project to ensure consultation with us takes place.*	The Applicant thanks Leeds City Council for its representation, and notes that the authority is unlikely to take part in the Examination as a neighbouring authority. Following review of our records we have noted that the email address used to contact Leeds City Council to advise of the Pre-Application phases was incorrect. However, we can confirm that hard copies of the formal correspondence were posted to Civic Hall, Caverley Street, Leeds, LS1 1UR. We can also confirm that our records have now been updated with the correct email address for any future correspondence and we will ensure both email and postal updates will be sent to these addresses. If Leeds City Council wishes to discuss the Application further outside of the Examination process, the Applicant would be willing to facilitate this.

Table 2.4 – Carlton Parish Council [RR-050]

Reference	Theme	Issue Raised	Applicant's Response
CPC-01	Principle of the Proposed Development	*Carlton Parish Council (North Yorkshire) oppose the proposed large scale Helios Solar Farm, the planning application for which is believed to be imminent. The Parish Council highlight our concerns and reservations about the proposed Helios project which is considerably bigger that other solar projects in the area to which planning permission has been granted. This will mean the villages of Carlton, Camblesforth, and Hirst Courtney will be become guinea pigs in the quest for more land taken up for larger solar farm projects.*	As set out in the Planning Statement **[APP-228]**, the Proposed Development will provide a significant amount of low carbon electricity over its lifetime, helping provide increased energy resilience, security and affordability. It will therefore be a critical part of the national portfolio of renewable energy generation that is required to decarbonise the country's energy supply quickly whilst providing security and affordability of national energy supply. The Proposed Development has sought to reduce landscape impacts on receptors, through changes to the red line boundary as well as introducing new and reinforcing existing screen planting and areas of woodland.
CPC-02	Agricultural Land	*There are many reasons why we object to this project going ahead which are listed below:* • *During a time when the UK is struggling with Food Security (Government Food Strategy) this project will remove 476 hectares of high quality arable land. We are a proud farming community who would wish to maintain our local farming economy.*	The comments about the farming community are noted. As set out in ES Appendix 14.4 Analysis of UK Food Security **[APP-174]**, the Government has not identified a food security concern, and has provided confirmation that the supplies of food are varied and robust. There is no requirement for landowners to use land for food production, and Government initiatives such as the Sustainable Farming Incentive actively promote and fund non-food use of farmland for other benefits.
CPC-03	Land Contamination	• *As a farming community, we value the ecology and sustainability of the land therefore we are concerned for the toxic metal components containing cadmium and lead in the solar panels and the use of hydrochloric acid, gallium arsenide, sulfuric acid and copper, indium, gallium, di-selenide, in their manufacture.*	There are limited potential pollution risks associated with the Proposed Development. The Phase 1 Ground Conditions Assessment **[APP-114 to APP-116]** concludes that potential pollutant linkages identified on-Site are able to be mitigated through the implementation of standard mitigation measures which are set out

Reference	Theme	Issue Raised	Applicant's Response
			within the oOEMP **[APP-124]**. These measures will be implemented through the OEMP, to be secured via DCO Requirement 7.
CPC-04	Waste	• *We also question what happens to these large numbers of solar panels containing toxic elements at the end of their life span, or when requiring replacement during the next 40 years. There is insufficient infrastructure capacity to safely deal with the proposed levels of e-waste and the toxic elements.* • *Although the company engaged with the community through seminars/ consultations, where you could examine the detail of the project, the scale of the project, and level of expertise, the hosts failed to alleviate our concerns. No detail of what percentage of components will be recycled, and what will have to go landfill or be buried.*	Decommissioning waste management will be carried out in accordance with the measures set out in Section 3.12, Littering and Waste, of the oDEMP **[APP-123]**. These measures will be implemented through the DEMP, which will be secured via DCO Requirement 5.
CPC-05	Landscape and Visual	• *The type of panel proposed have not been seen or tested in the UK before. These larger panels have a significant impact on the rural landscape. These new panels will sit over 2 metres from the ground, and will be visible when looking south from the A1041, next to residential properties, for a minimum of 15 years.*	The type of solar panels proposed are widely used in other developments across the UK. The proposed mounting structure (Single Axis Tracker) are also operational across the UK. The height of the solar panels has been a consideration factored into the Landscape and Visual Impact Assessment included in Chapter 7 (Landscape and Views) of the ES **[APP-027]**. The potential visibility of the Proposed Development has been a key consideration in the assessment process and has also influenced the proposed Landscape Strategy for the Site. It is considered that the Landscape Strategy would provide effective mitigation of the Proposed Development within 15 years.
CPC-06	Construction Traffic	• *The creation of the farm will cause significant disruption to the community for over 12 months. There is expected to be over 36*	As set out in the oCTMP **[AS-006]**, there are expected to be 18 HGV deliveries on average per day throughout

Reference	Theme	Issue Raised	Applicant's Response
		HGV deliveries every day that will impact local traffic on the country lanes and cause significant increases in noise and air pollution locally.	the 260 working days of the construction period, which equates to 36 total movements (arrivals and departures). The assessment in ES Chapter 10 Transport and Access **[APP-030]** concludes that the construction phase vehicle movements would have a negligible residual effect on road user and pedestrian safety, severance, road drive vehicle delay, non-motorised user delay and in terms of the effects of hazardous/large loads. The construction phase is assessed to have a minor adverse (not significant) residual effect on non-motorised user amenity (including fear and intimidation). ES Chapter 11 Noise and Vibration **[APP-031]** concludes that construction noise, road traffic and vibration will all have negligible residual effect. As set out in ES Chapter 2 EIA Methodology **[APP-022]**, Air Quality has been scoped out of the assessment given that the anticipated vehicle movements during construction are below the relevant threshold criteria set out by the Institute of Air Quality Management (IAQM, 2017). It is therefore considered that the construction phase of the Proposed Development will not cause significant effects in terms of traffic, noise or air pollution.
CPC-07	Biodiversity	*The large area of land expected to be transformed is currently home to a wide variety of wildlife and nature, including free roaming deer, birds of prey, and small mammals. We are passionate about our local area and fear this natural beauty will be lost to a building site and then a huge canopy of sun blocking electrical cells.*	The impact of the Proposed Development on biodiversity is assessed in ES Chapter 8 Biodiversity **[APP-028]**. It is concluded that there will no significant adverse effects on biodiversity as a result of the Proposed Development. The Proposed Development includes significant habitat enhancement provisions;

Reference	Theme	Issue Raised	Applicant's Response
			these will be managed for the benefit of wildlife over the long term and will provide biodiversity gains for a wide variety of species. Additionally, the proposed creation of diverse grasslands, tree planting and hedgerow planting will deliver a quantifiable biodiversity benefit.
CPC-08	Landscape and Visual	*Lesser applications are being dismissed on the grounds that the introduction of panels and other infrastructure, including transformers, inverters and fencing will "inevitably introduce a fundamental change to agricultural land" and the major visual harm that would come with the project. The situation is no different in the case of our community. We strongly urge that when this planning proposal comes to you that you seriously consider the affects this will have on our community for generations to come, and recommend a rejection.*	The changes to the landscape and the potential effects on landscape and visual receptors has been assessed in Chapter 7 (Landscape and Views) of the ES **[APP-027]**. The Proposed Development has sought to reduce landscape impacts on receptors, through changes to the red line boundary as well as introducing new and reinforcing existing screen planting and areas of woodland. The impacts of the Proposed Development are considered against the need and benefits that the Proposed Development will bring in the Planning Statement **[APP-228]**.

Table 2.5 – Hirst Courtney and West Bank Parish Council [RR-142]

Reference	Theme	Issue Raised	Applicant's Response
HCWBPC-01	Local Impacts	*We strongly object to the proposed Helios Solar Farm and Battery Storage facility for a number of reasons. It will ruin the landscape for the whole area. The very reason people bought houses and moved here was for the beautiful country side, and not an industrial estate! Loss of good quality agricultural land, detrimental change to the character of open fields and farmland, health & Safety risks posed by the battery storage and long term as a result of noise and visual impact, cumulative impact alongside the 2 other solar farms proposed, risk of encouraging further crime in the area, potential negative effect on house prices, alongside various projects locally expected around the same time, there will be a huge impact in terms of traffic, negative impact on natural biodiversity and habitats, better alternatives in terms of location and more efficient energy production.*	As set out in the Planning Statement **[APP-228]**, the Proposed Development will provide a significant amount of low carbon electricity over its lifetime, helping provide increased energy resilience, security and affordability. It will therefore be a critical part of the national portfolio of renewable energy generation that is required to decarbonise the country's energy supply quickly whilst providing security and affordability of national energy supply. The Proposed Development has sought to reduce landscape impacts on receptors, through changes to the red line boundary as well as introducing new and reinforcing existing screen planting and areas of woodland. The changes to the landscape and the potential effects on landscape and visual receptors has been assessed in Chapter 7 (Landscape and Views) of the ES **[APP-027]**. The Proposed Development has sought to reduce landscape impacts on receptors, through changes to the red line boundary as well as introducing new and reinforcing existing screen planting and areas of woodland. The impact of the Proposed Development on agricultural land is assessed in ES Chapter 14 Soils and Agricultural Land **[APP-034]**. It concludes that the construction phase will have a moderate adverse (not significant) residual effect in terms of loss of Best and Most Versatile agricultural land, and the operational phase will have a moderate or minor adverse (not significant) residual effect on farm business and a neutral effect on BMV. Paragraph 2.6.21 to 2.6.25 of the

Reference	Theme	Issue Raised	Applicant's Response
			Alternative Site Assessment (ASA) **[APP-227]** set out the justification for the use of provisional Grade 2 agricultural land. As shown in Figure 2.7 of the ASA, the majority of the land within a 5km radius of the point of connection is either Grade 1 or Grade 2. The Grade 3 land within the 5km radius is not available for development due to existing uses and planning applications occupying these areas. ES Chapter 11 Noise and Vibration **[APP-031**] concludes that construction noise, road traffic and vibration will all have negligible residual effect. Each technical chapter within the ES includes a summary of cumulative effects, which are subsequently summarised in Chapter 15 Cumulative Effects **[APP-035]** which addresses both inter- and intra-project effects. The only significant cumulative effects are identified in relation to landscape (adverse), biodiversity (beneficial) and socio-economics (beneficial). The impact of the Proposed Development on biodiversity is assessed in ES Chapter 8 Biodiversity **[APP-028]**. It is concluded that there will no significant adverse effects on biodiversity as a result of the Proposed Development. There will be significant beneficial effects on non-statutory designated sites, habitats and breeding birds as a result of the operational phase. As set out in ES Chapter 8 **[APP-028]**, Defra's Statutory Biodiversity Metric Calculation Tool show that the Proposed Development will result in a biodiversity net gain of 55.70% in Habitat Units,

Reference	Theme	Issue Raised	Applicant's Response
			61.11% in Hedgerow Units and 9.05% in watercourse units. The Applicant is not aware of any empirical evidence to suggest that the presence of solar farms affects nearby property values. In any event, property value is not a material planning consideration. The assessment in ES Chapter 10 Transport and Access **[APP-030]** concludes that the construction phase vehicle movements would have a negligible residual effect on road user and pedestrian safety, severance, road drive vehicle delay, non-motorised user delay and in terms of the effects of hazardous/large loads. The construction phase is assessed to have a minor adverse (not significant) residual effect on non-motorised user amenity (including fear and intimidation). A BESS Safety Management Plan **[APP-119]** has been produced to define the proposed safety strategy, requirements, and processes necessary to meet agreed safety objectives and to set a level of safety performance that the BESS is to be measured against. It also provides the basis for the safety management processes and procedures required to satisfy the identified safety requirements for the BESS. Consultation and communication has also been undertaken with North Yorkshire Fire and Rescue Service (NYFRS) which has informed the outline BESS safety management plan.

Table 2.6 – Camblesforth Parish Council [AS-004]

Reference	Theme	Issue Raised	Applicant's Response
CAPC-01	Consultation process	***8.4 Cllrs to discuss proposed Helios Solar Farm – in light of developer declining to attend the Parish Meeting, Cllrs to discuss formal response from the Parish Council to the consultation.*** *Chair and Cllrs noted their disappointment that Enso, the developer of the proposed solar farm had decided not to attend tonight's meeting to speak to them and felt this was highly disrespectful – the meeting date had been changed and Cllrs had altered plans to accommodate the visit - it was further noted that this had happened with Enso on two previous occasions. In this vein Cllrs also heard that a Cllr who had attended one of the public consultations with Enso, felt that the (Enso} representatives attending appeared very 'standoffish and aloof' when dealing with residents.* *Following on from the previous meetings at which Cllrs had advised that if residents wished to let the Parish Council know their views on the proposed development, they should contact the Parish Council, Clerk noted that as of the date of the meeting, only 28 residents had done this, and that it was hoped that more had taken part in the actual consultation and advised Enso of their views. Clerk continued that he had written to Enso to request the statistics and summaries of resident comments which would be another way to gauge resident concerns / interest in this matter.* *Cllrs discussed and debated the proposals as outlined in the consultation and expressed their respective views.* ***Resolved*** *At the conclusion of the discussion, a vote was taken and by majority vote (five opposing the development and one abstaining) it is duly resolved that the Parish Council would not support the new*	The Consultation Report **[APP-181]** sets out the consultation between the Applicant and interested parties/stakeholders prior to the submission of the Application. This includes engagement with Camblesforth Parish Council. Table 14.2 sets out the correspondence undertaken with Parish Councils. Chapter 11 of the Consultation Report **[APP-181]** further discusses the process of consultation undertaken to comply with the relevant sections of the Planning Act 2008. . A Statement of Compliance has been prepared which confirms that the Applicant has complied with all statutory requirements in Chapter 18 of the Consultation Report **[APP-201]**.

Reference	Theme	Issue Raised	Applicant's Response
		solar farm. For the purposes of these minutes, the summary headlines of the reasons for the Parish Council opposing the proposed solar farm are as follows:	
CAPC-02	Design (scale)	*• the scale / size of this proposal was of concern and unsuitable for a rural setting – it would be out of character with the area and visually obtrusive*	Large areas of land are ideal for large scale solar development, as contiguous sites reduce the need for excessive cabling. Further, open fields without vegetated boundaries mean less vegetation will be removed during construction. A land assembly of larger, fewer fields also means the buffering around field edges for tree root protection and the avoidance of shading can be reduced. Therefore, sites with larger open fields of a regular shape which were within the search area were preferred. The height of the solar panels has been a consideration factored into the Landscape and Visual Impact Assessment included in Chapter 7 (Landscape and Views) of the ES **[APP-027]**. The potential visibility of the Proposed Development has been a key consideration in the assessment process and has also influenced the proposed Landscape Strategy for the Site. It is considered that the Landscape Strategy would provide effective mitigation of the Proposed Development within 15 years.
CAPC-03	Cumulative	*• Camblesforth had 2 solar farms approved for the areas Cllrs felt that the Parish had 'done our bit' to help combat climate change*	Appendix 2 to the Planning Statement **[APP-227]** sets out that regional considerations were taken into account when seeking to develop a solar PV project. In comparison to some other parts of the UL, specific areas within North Yorkshire have a combination of good levels of irradiation and large flat open areas of land. The specific area where the Proposed

Reference	Theme	Issue Raised	Applicant's Response
			Development Site eventuated has a significant amount of pre-existing transmission infrastructure, namely the national electricity transmission system (NETS) at National Grid's Drax Substation. Given the proximity to the National Grid Drax 132kV Substation, this region had the additional benefit of reducing the need for additional overhead infrastructure (with associated commercial costs and landscape and visual impacts), or other supporting infrastructure to connect the generator to the national grid.
CAPC-04	Biodiversity	• *The size of the proposed solar farm had major implications for wildlife and local biodiversity*	The impact of the Proposed Development on biodiversity is assessed in ES Chapter 8 Biodiversity **[APP-028]**. It is concluded that there will no significant adverse effects on biodiversity as a result of the Proposed Development. The Proposed Development includes significant habitat enhancement provisions; these will be managed for the benefit of wildlife over the long term and will provide biodiversity gains for a wide variety of species. Additionally, the proposed creation of diverse grasslands, tree planting and hedgerow planting will deliver a quantifiable biodiversity benefit.
CAPC-05	Agricultural Land	• *Again, the size of the solar farm would mean a detrimental change to the fields with the loss of a considerable amount of agricultural land*	The impact of the Proposed Development on agricultural land is assessed in ES Chapter 14 Soils and Agricultural Land [APP-034]. It concludes that the construction phase will have a moderate adverse (not significant) residual effect in terms of loss of Best and Most Versatile agricultural land, and the operational phase will have a moderate or minor adverse (not significant) residual effect on farm business and a neutral effect on BMV. Paragraph 2.6.21 to 2.6.25 of the

Reference	Theme	Issue Raised	Applicant's Response
			Alternative Site Assessment (ASA) [APP-227] set out the justification for the use of provisional Grade 2 agricultural land. As shown in Figure 2.7 of the ASA, the majority of the land within a 5km radius of the point of connection is either Grade 1 or Grade 2. The Grade 3 land within the 5km radius is not available for development due to existing uses and planning applications in these areas.

2.2. The Applicant's responses to Other Statutory Consultees, National Agencies, Undertakers and Elected Representatives

Table 2.7 – British Gliding Association [RR-039]

Reference	Theme	Issue Raised	Applicant's Response
BGA-01	Burn Gliding Club	*I am writing on behalf of the British Gliding Association (BGA) to register the BGA's objections to the above proposed National Infrastructure Project. I write in support of our member club, Burn Gliding Club and support their objections and concerns to the proposal in its current form.* *In addition the BGA views Burn Airfield as a significant asset for the sport of gliding and the Selby District local community.* *Burn Gliding Club are the current operators of Burn airfield which is adjacent to the proposal. As set out in Chapter 1, paragraph 1.14 of CAP764, the BGA recognises that it is the airfield operators, i.e. Burn Gliding Club who are the experts in relation to the flying operations from Burn airfield.* *In making these comments, source material includes submissions by Burn Gliding Club and the CAA Airfield Advisory Team's assessment dated 30th September 2024. Both highlight insufficient assessment of the potential impact of this project on the safe operations of Burn Gliding Club at Burn Airfield.*	The contents of the Relevant Representation made by the British Gliding Association have been noted by the Applicant. The Applicant is proactively engaging with Burn Gliding Club in respect of the matters raised in its Relevant Representation **[RR-039]**. The Applicant is undertaking additional assessment work in connection with the activities of Burn Gliding Club and this will be submitted at a future Deadline. It is not possible to state which deadline at this stage as it is dependent on receiving information from Burn Gliding Club.
BGA-02	Burn Gliding Club	*There are two areas which the BGA particularly wishes to highlight due to the potential effects on flight safety:* • *EFATO (engine failure after takeoff)* • *Glint and glare*	The Applicant is undertaking additional assessment work in connection with the activities of Burn Gliding Club and this will be submitted at a future Deadline. It is not possible to state which deadline at this stage as it is dependent on receiving information from Burn Gliding Club.

Reference	Theme	Issue Raised	Applicant's Response
BGA-03	Burn Gliding Club	***EFATO*** *As discussed in Burn GC's document (paragraph 5.23) and in section 4 of the CAA AAT's document, the available emergency landing site options have been reduced, particularly from runway 15. Insufficient analysis of the current proposal has been carried out to be able to understand the risks created by the proposal and suitable mitigations.*	Pager Power, on behalf of the Applicant, produced a High-Level Investigative study, 11606E, which considers the areas for glider launch failure as defined by Burn Airfield and consulted with Burn Gliding Club on the report prior to submission of the Application. A copy of the report is attached at Appendix A. There is no legislative guidance or official technical methodology defined to assess these areas; however, Pager Power have used their technical expertise and past project experience to consider a comparative approach to the existing conditions. More than two thirds (68%) of areas within the defined areas remain available for emergency landing in the event of glider launch failure. The Applicant is undertaking additional assessment work in connection with the activities of Burn Gliding Club and this will be submitted at a future Deadline. It is not possible to state which deadline at this stage as it is dependent on receiving information from Burn Gliding Club.
BGA-04	Glint and Glare	***Glint and glare*** *As highlighted by the CAA AAT document and comments by Burn GC, the 'Solar Photovoltaic Glint and Glare Study' (PINS document number: EN010140/APP/6.3.2.5) accompanying the proposal does not consider the actual flying operations from Burn airfield.* *Burn Gliding Club have provided detailed information about how circuits to land are conducted in gliders. The circuit creates a concentration of aircraft, and, although rare, collisions do occur; given the low altitude, options for bailing out are reduced and survival is less likely. Consequently, anything that impedes or*	The Applicant has undertaken a Solar Photovoltaic Glint and Glare Assessment **[APP-117]**. The Assessment concludes that mitigation is required for the approach path towards runway 25 at Burn Airfield. The Applicant is proactively engaging with Burn Gliding Club in respect of the matters raised in its Relevant Representation **[RR-043]** in respect of glint and glare. The Applicant is undertaking additional assessment work in connection with the activities of Burn Gliding Club and this will be submitted at a future Deadline. It is not possible to state which deadline at this stage as it

Reference	Theme	Issue Raised	Applicant's Response
		distracts the pilot from keeping a good lookout during the landing circuit will have a major influence on flight safety. *At present there is insufficient information to establish whether the glint and glare from the proposal would affect pilots during this critical phase of the flight.* *In reading around, I found CAP1218 'CAA Response to the Airports Commission's Inner Thames Estuary study outputs' (2014) paragraphs 1.19 & 1.20: The Air Navigation Order 2009, Article 137 states that 'a person must not recklessly or negligently act in a manner likely to endanger an aircraft, or any person in an aircraft'. This has previously been applied to situations where a person positively endangers the safety of an aircraft, such as recent cases of shining lasers at pilots on approach to landing.* *The CAA agrees that relying on an offence under Article 137 would not be desirable, as it presumes that a dangerous situation is allowed to occur and may continue until a successful prosecution. The offence would also constitute either doing nothing, or not doing enough, to mitigate risks or facilitate their mitigation, arising from a pre-existing situation.*	is dependent on receiving information from Burn Gliding Club.
BGA-05	Burn Gliding Club	*On both EFATO and Glint and glare points, the BGA is concerned this proposal might gravely endanger operations at Burn airfield.* *Further, in CAP764 'CAA Policy and Guidelines on Wind Turbines' (sixth edition, Feb 2016), Chapter 1 paragraph 1.14 states: In all cases, regardless of the status of the aerodrome, any development that causes pilots to experience an increase in difficulty when using an aerodrome may lead to a loss of utility.* *It is not clear whether the siting of the proposal under where circuits are usually flown would distract pilots.*	This guidance specifically relates to the potential effects of wind turbines on aviation. Wind turbines are significantly larger than solar panels and have moving parts and therefore do not provide an accurate comparison in terms of safety concerns. Whilst its policy and guidelines can be considered for its technical merit, it's link to glint & glare or glider launch failure needs to be clarified. The guidance for wind turbines sets out the factors that should be taken into account in any assessment, and this criteria has been applied as a conservative approach when assessing solar panels as

Reference	Theme	Issue Raised	Applicant's Response
			a wind turbine is a more significant source of turbulence when compared to solar panels.
BGA-06	Burn Gliding Club	***Loss of utility*** *It is not clear whether Burn Gliding Club could continue to operate as it currently does should the proposal go ahead in its current form. If it cannot, and activity is reduced when operating from some runway directions, there would be loss of utility. This is likely to impact the long term sustainability of the club, which should it close, would result in the loss of a valuable community sport facility.*	In terms of emergency landing concerns, the proposed development is not predicted to impact the long-term sustainability of the Club. The High-Level Investigative Report 11606E, concludes there is significant available space to perform a safe emergency landing in the event of glider launch failure or collision. With reference to the most-affected direction (runway 15), the predicted conditions are comparative to the existing conditions for runway 01. The Applicant is undertaking additional assessment work in connection with the activities of Burn Gliding Club and this will be submitted at a future Deadline. It is not possible to state which deadline at this stage as it is dependent on receiving information from Burn Gliding Club. .
BGA-07	Burn Gliding Club	***Burn Airfield as a significant asset for the sport of gliding and the local community*** *The BGA views Burn Airfield as a significant asset for the sport of gliding and the Selby District local community. There are many reasons why this is so. In 2019, the BGA wrote the following about Burn Gliding Club and Burn Airfield, in response to a consultation carried out by Selby District Council. The comments remain valid (some statements are clearly contemporaneous with 2019) and are included in an appendix to show why Burn's use for gliding is so valuable.*	Noted, no response required.

Reference	Theme	Issue Raised	Applicant's Response
BGA-08	Burn Gliding Club	***Conclusion*** *Of the many aspects raised by both Burn Gliding Club and the CAA AAT, the three top areas of concern for the BGA are:* • *Insufficient information to establish the level of risk in relation to EFATO* • *Insufficient information to establish the level of risk in relation to glint and glare* • *Potential loss of utility should any risks related to EFATO and glint and glare not be mitigated*	Whilst emergency landing concerns are addressed within the High-Level Investigative Report 11606E which provides a comparative assessment in the absence of any available guidance,, the Applicant is undertaking additional assessment work in respect of this in consultation with Burn Gliding Club. This will be submitted at a future Deadline. It is not possible to state which deadline at this stage as it is dependent on receiving information from Burn Gliding Club. Glint and glare concerns will be addressed with further updates to the original Solar Photovoltaic Glint and Glare Study **[APP-117]** to include potential effects towards the visual circuits. Mitigation can be implemented where it is concluded that there is a significant effect upon aviation activity as a result of glint and glare. No significant impacts are predicted upon emergency landing procedures.

Table 2.8 – Burn Gliding Club [RR-043]

Reference	Theme	Issue Raised	Applicant's Response
BGC-01	Burn Gliding Club	*1.1 Burn Gliding Club (BGC) was contacted by Helios in December 2023. A zoom meeting took place on 7 December. As requested, the Club set out its concerns about the impact of the proposed solar installation on gliding activities. In February 2024, a report entitled 'High-Level Investigative Report' prepared by Pager Power was issued to BGC. This report addressed thermal issues only. BGC made detailed comments on this report, and on the other issues that needed to be assessed, following a meeting with Pager Power in April 2024.* *1.2 BGC raised three key issues with Pager Power from the start of its engagement – namely Glint and Glare, Thermic Updraughts and Launch Failures. BGC also explained that the specific circumstances for its concern are winch launches, aerotows and flying in the gliding circuits.* *1.3 In the documentation submitted with the DCO Application, only ENO10140-000362- 6.3 Environmental Statement Appendix 2.5 – Solar Photovoltaic Glint and Glare Study addresses potential issues for Burn Gliding Club and, as is evident from the title, this only addresses one of those three key issues.* *1.4 This response to the Application explains the nature and scale of activity at Burn Airfield and how the safety of the operations could be adversely affected by the proposed development. It addresses all of the issues, not just those referred to in Appendix 2.5 of the Environmental Statement.* *1.5 It then explains the Club's concerns in the context of the value of the facility to the Club and other users and relevant Planning and Aviation Policy.*	The meeting on the 7th December discussed concerns regarding glider launch failure, windshear, turbulence, updraft, and electromagnetic fields and interference. These areas were assessed within 11606E High Level Investigative report and were not limited to thermal issues. All three issues have been addressed across the Solar Photovoltaic Glint and Glare Assessment **[APP-117]** and the High-Level Investigative Report included at Appendix A of this document. Further work concerning glint and glare is currently ongoing and will be submitted at a future Deadline. It is not possible to state which deadline at this stage as it is dependent on receiving information from Burn Gliding Club.

Reference	Theme	Issue Raised	Applicant's Response
		1.6 It then sets out the additional information considered to be necessary for this Application to be properly assessed and suggested mitigation measures.	
BCG-02	Burn Gliding club	*2.1 Burn Gliding Club has been operating for nearly 50 years and is very well established. It is formally registered as a Community Amateur Sports Club (CASC). It provides an important facility in an attractive rural setting, serving the major conurbations in Yorkshire and draws visitors from across the country.* *2.2 The UK has been one of the world's most successful gliding nations in recent years. Since 2000, Britain has produced fourteen world champions and is consistently ranked in the top three in the International Gliding Commission's world rankings.* *2.3 The Gliding Club introduces some 200 people to the art of gliding every year, through the Air Experiences it offers, as well as offering corporate experience / team building. In addition, the Gliding Club provides subsided flying for disabled organisations including the Charity 'Sportability' and organisations associated with past squadrons based at Burn when it was occupied by the RAF.* *2.4 Burn Gliding Club is affiliated to the British Gliding Association (BGA). It trains members to fly gliders in line with the BGA training syllabus. It is proud to be affiliated to 'Women in Gliding' and to be a Juniors 'Centre of Excellence'.* *2.5 Proximity to Selby makes Burn very accessible for local residents, particularly young people who can start gliding at age 12, go solo at 14 and gain a pilot's license at 16 – which nurtures an early interest in aviation, work ethic, leadership and assists with Science, Technology, Engineering and Mathematics (STEM).* *2.6 The Gliding Club is not the only user of the airfield site. It is also used by farmers and the original perimeter track is used for the*	No action required. Noted, no response required.

Reference	Theme	Issue Raised	Applicant's Response
		weekly Selby Parkrun. Other organisations such as the Aero Modelling Group use the site. The Trans Pennine Trail runs down the eastern side of the airfield site. Recently the Scouts and ATC have expressed interest in using the site. *2.7 Burn Airfield is also used for Training and Police exercises as it has available runway access for larger aircraft and ground forces. It has also been used as a landing area by members of the Royal Family and other VIPs in helicopters and corporate aircraft.* *2.8 The open space of Burn Airfield is also well visited by walkers, runners and cyclists who are attracted by the large, safe, open area, the history of the Airfield and the pleasure of watching gliders.* *2.9 The site has diverse wildlife (adders, raptors etc) and this attracts those with an interest in wildlife too. The Trans Pennines trail describes Burn Airfield thus: 'Although the majority of the buildings have gone, all the runways and most of the aircraft parking areas still survive. This is in no small part achieved by the efforts of the Burn Gliding Club, which began using the airfield in 1983. Today on 5 flying days graceful gliders circle above these historic acres as if in silent requiem to those who flew before.'*	
BGC-03	Burn Gliding Club	*3.1 The airfield was built in WW2 and used between 1943 and 1944 as part of No4 Bomber group. After the war the airfield was used for storage of military vehicles and armaments before being leased back to the farmers. In 1947 the airfield suffered from serious flooding along with much of the local area as the Selby Canal overflowed due to high water levels in the Rivers Aire and Ouse.* *3.2 The airfield has three runways, orientated 07/25 (1300m in length), 01/19 (1100m in length), 15/33 (950m in length). These are the standard means of describing runways, based on the compass. 07/25 therefore generally south west / north east; 01/19 generally north / south and 15/33 generally north west / south east. This*	Information regarding runway details was obtained from Pooley's for the Solar Photovoltaic Glint and Glare Assessment **[APP-117]** and corresponds to the information within Appendix 1 of Burn Airfield's response.

Reference	Theme	Issue Raised	Applicant's Response
		information together with other technical details for pilots is contained in the two main UK General Aviation Flight Guides – Pooleys and the UK VFR Flight Guide. These entries are at Appendix 1. *3.3 Unusually the original three RAF runways and the perimeter track remain albeit they are in a poor condition. The runways are now maintained by Burn Gliding Club for suitable use of gliders and tug aircraft. However, as the runways now benefit from improved drainage, the Club is able to operate year round even following wet weather when other clubs with grass airfields are waterlogged.* *3.4 The Club has a modern clubhouse with function / bar area, a gliding simulator, a workshop for aircraft maintenance and a large hangar for the fleet of 5 gliders as well as tugs and motorgliders. There is also onsite fuel storage.* *3.5 The Club also has an area for trailer parking for privately owned gliders and a members' only caravan site for touring caravans and campers.*	
BGC-04	Burn Gliding Club	*4.1 In the three-year period 28th August 2021 to 28th August 24 the Club had 21,369 movements (a winch launch = 1 movement, an aerotow launch = 2 movements (one tug and one glider), an aircraft landing = 1 movement).* *4.2 The number of movements is not uniform, during poor soaring days the flights will be short and more launches are achieved, on a good soaring day the flights can be longer, a training flight of 30 minutes or a solo flight longer than an hour. Private owners often delay their launch to utilise the best part of the day and remain airborne for several hours.* *4.3 Predominately a winch launch site, the Club has 2 Skylaunch winches providing efficient and reliable launches to heights ranging*	Noted, no response at this time, although the Applicant is committed to working with Burn Gliding Club to understand their concerns.

Reference	Theme	Issue Raised	Applicant's Response
		to 1000ft to 2300ft above the airfield depending on the runway length and wind strength. Aerotows are by suitably equipped powered aircraft and can be up to 5000 ft depending on the intended purpose of the flight and the release point in a suitable area. *4.4 Burn Gliding Club can operate from all 6 runway directions which allows mitigation from excessive cross wind components. The hard runways are not subject to flooding and remain available following significant rainfall unlike the surrounding fields which are regularly waterlogged.* *4.5 The preferred area for the launch point is at a runway inter-section allowing sufficient length for safe winch. It also facilitates aerotows and on runways 07,01,33 and 25 to have room to land and stop at the intersection. This allows efficient glider handling.* *4.6 The stubs on runways 15 and 19 are in a poor condition and unsuitable for safe landings.*	
BGC-05	Burn Gliding Club	*Glint and Glare* *5.1 Glider pilots are trained to carry out a standard gliding circuit in accordance to the BGA training manual. See BGA Instructor Manual Section 3 figures 1,2,3 at Appendix 2. This shows the standard gliding circuit is not a 'straight in' approach from 2 km out and 3 degree slope but involves flying a descending circuit parallel to and within gliding range of the landing area with 3 turns somewhere between 900 and 300 ft above the ground. (These heights can only be judged by eye due to inaccuracy of the instruments and where the level of the topography is unknown (e.g. a field landing)). A key part of teaching these exercises are briefings to explain the theory and practical aspect of the exercise, a second briefing to go over the*	The Solar Photovoltaic Glint and Glare Assessment **[APP-117]** will be updated to assess the potential effects towards the circuits at Burn Airfield.

Reference	Theme	Issue Raised	Applicant's Response
		flying again, A third brief immediately before the launch and finally a post flying brief to cover what was learned during the flight. *5.2 For circuits, where repeated flights are carried out, they need to be, where possible, consistent so the trainee is able to replicate what the instructor has demonstrated. Should these exercises be adversely affected by turbulence the replication is lost as the pilot is concentrating on reacting to the external forces upsetting the aircraft handling.* *5.3 Throughout Appendix 2.5 the wording clearly assumes and makes consistent references to '…runway 25 approach…' '…approach path…' etc and, as can be seen in the Section 6 the 'Geometric Calculation Results', all refer to 'Runway Approach'.* *5.4 However, at Burn Gliding Club, a landing on runways 01/19, 33 and 25 will involve flying some or all of the circuit over the proposed solar farm at low level and the Glint and Glare cannot be determined due to the inconsistent height and position of the glider and the position of the sun. The circuit is in a busy volume of airspace and aircraft separation is by looking out. Anything which distracts from looking out increases the risk of collision.* *5.5 On a soaring day many gliders are often airborne at the same time. Should the soaring conditions change they are all likely to want to land at the same time. In this scenario pilots capacity will be tested to the full and any distraction could have serious consequences*	
BGC-06	Burn Gliding Club	*5.6 Section 7.1.2 in the Appendix 2.5 (page 63) refers to mitigation used by pilots. Only a. (wearing sunglasses), can be feasible in a glider. Items b. to g. are impractical for a glider (which demonstrates again that Pager Power has no knowledge of gliding and has not taken the risks to Burn Gliding Club seriously). Wearing sunglasses to avoid glare but in conditions that do not otherwise warrant them*	The Applicant acknowledges that two of the suggested mitigation options within Section 7.1.2 are unfavourable for glider pilots; these include landing at an alternate airfield and aborting their landing. The remaining mitigation options, a-d and f, can be accommodated by a glider pilot. In particular Burn Airfield recognise in

Reference	Theme	Issue Raised	Applicant's Response
		can reduce the effectiveness of the human eye – reduced detail / narrow depth of field – this would increase risk of mid air collision in the circuit / approach phase of flight.	paragraph 4.4 of their response that all 6 runways are available for landing to mitigate for excessive crosswinds, and therefore there are 5 possible alternative runway directions for a pilot to utilise if required. If a pilot is experiencing glare then the weather conditions would be such that they would require sunglasses for the conditions as glare would only be possible from the solar panels on a clear and sunny day.
BGC-07	Burn Gliding Club	*5.7 There is repeated acknowledgement of 'Potential Temporary After Image'. That is an unacceptable risk for a pilot.* *5.8 The Civil Aviation Authority's Combined Aerodrome Safeguarding Team (CAST) Guidance Note July 2023, 'Renewable energy developments: solar photovoltaic developments' states: In all instances, where a developer is proposing an on- or off-aerodrome solar photovoltaic (PV) development, early consultation with the aerodrome authority is recommended to understand any concerns and to collaborate as much as possible.' It goes on to state that glint and glare is a 'key safety concern'.* *5.9 In addition, Pager Power as a member of CAST and contributed to the first draft of the above document, it will be aware that the first draft stated: 'A glint and glare assessment is a key assessment requirement for any on- or near aerodrome solar PV development, in fact for any development capable of producing spectacular solar reflections.'* *5.10 The close proximity of the proposed site to Burn Airfield is an issue with respect to the potential dangers of the glint and glare aspects to pilots landing; the site is only 350m away from the airfield. There will be a large amount of the local soaring area and*	Industry best practice for aviation categorises glare intensities into 'low potential for temporary after-image' (green glare) and 'potential for temporary after-image' (yellow glare). This is derived from the FAA guidance that has been adopted as the industry standard for aviation impacts and has been accepted across a number of NSIPs as an appropriate categorisation of impacts. Where a 'low potential for temporary after-image is predicted, this is deemed to be acceptable and mitigation is not required. The Applicant is undertaking additional assessment work in connection with the activities of Burn Gliding Club and this will be submitted at a future Deadline. It is not possible to state which deadline at this stage as it is dependent on receiving information from Burn Gliding Club.

Reference	Theme	Issue Raised	Applicant's Response
		circuit paths which is above the solar panels, It is critical to pilots, and the Club, to know if this will remain safe with regard glint and glare while soaring or flying the circuit above. Helios has not provided any technical evaluation of this.	
BGC-08	Burn Gliding Club	*Thermal Updrafts* *5.11 Also of significant concern is the effect of thermal updrafts and downdrafts caused by the differential heating of the solar farm and the surrounding land areas.* *5.12 This issue is not addressed in Appendix 2.5.* *5.13 The February 2024 'High-Level Investigative Report' (Appendix 3) addressed 'HighLevel Wind Shear, Turbulence and Updraft Assessment', refers to a 60m. buffer to mitigate wind effects of the panels. Proper assessment of risk is normally site and operation specific and this has not been carried out.* *5.14 However, the reference to the updraft in section 5.2.2 suggests the air brakes can be used to counteract thermic activity. This clearly acknowledges that thermic activity could occur.* *5.15 It would be totally unacceptable to be manipulating air brakes to manage glider stability in what is currently, and should be, a standard glider circuit. There are reports in the public domain about the increased heating of the local air temperature, therefore this warmer air will create instability as if rises and is displaced by cooler air causing changes in wind strength and direction within the circuit pattern.* *5.16 BGC explained this in its April response (Appendix 4) and, importantly, emphasised that a more detailed approach than 'High-Level' was required. Detailed information is essential to ensure that safety is not going to be compromised at all circuit heights.*	There is no known assessment guidance regarding thermal updrafts. Thermal updraft is most significant if there is a higher difference in temperature between the source (i.e. surface of solar panel) and the environment. If there are reports of local temperature rising, then this would, by definition, reduce the temperature difference between a solar panel and the environment and, therefore reduce the likelihood of thermal updraft. Whilst it is acknowledged that thermal updrafts are theoretically possible, any resultant thermal updrafts in practice are not considered significant because solar panels are designed to absorb as much energy from the sun. Any losses would decrease the efficiency of solar panels. A 60m buffer is derived from the conservative approach of the maximum height of panels above ground, and a 'safety' factor of 20 times the maximum height. This method is typically undertaken for structures of significant height with moving parts (such as wind turbines) where effects of turbulence and wind shear are significantly more noticeable. The Applicant considers that any resultant updraft from the proposed development would be comparable to

Reference	Theme	Issue Raised	Applicant's Response
		5.17 BGC also reiterated its offer for Helios to visit the site to fully understand the Club's concerns. No response was made to this offer. *5.18 BGC has not, therefore, been provided with any additional information on this issue and its grave concerns, therefore, remain. The High-Level report concluded '…wind shear and turbulence, and updraft impacts of the proposed development upon aircraft using Burn Airfield will be of negligible impact.' This has not been proven.* *5.19 In addition, it is not for the proposer to judge 'significant' (Paragraph 7.1 – 'No significant impacts are predicted upon aviation activity associated with Burn Airfield and Burn Gliding Club'). The Civil Aviation Authority's CAP 738 (Introduction paragraph 7) makes clear that the aerodrome operator is the expert in assessing safety due to his or hers detailed knowledge of the site and its operations. Paragraph 2.3 also urges unlicensed sites to follow the guidance relating to licensed aerodromes* *5.20 In addition, it would also now appear and the absence of reference in the submitted application documents that this serious issue has now been completely dismissed by the applicant.* *5.21 The High-Level report at paragraph 1.2 refers to the Civil Aviation Authority's Combined Aerodrome Safeguarding Team (CAST) Guidance but its advice does not appear to have been followed.*	updraft already experienced by pilots from natural/manmade sources to stay in-flight. It is therefore considered that the airbrakes, a main mechanism used by gliders to counteract opposing forces during gliding, can also be used to counteract effects of thermal updraft. Burn Gliding Club have not provided any evidence which can be considered by the Applicant in respect of this matter. The Applicant is willing to continue to engage with the Club to further discuss its concerns.
BGC-09	Burn Gliding Club	*Loss of land for safe emergency landings / managing launch failures after take-off* *5.22 An 'aerotow' is the launch of a glider having been towed behind a powered aircraft which is then released to soar.*	An estimated 90% of land remains available for runway direction 07 after consideration of the land being developed for the proposed development. This is due to the solar development being located outside the areas defined for emergency landing.

Reference	Theme	Issue Raised	Applicant's Response
		5.23 With an aerotow there is a risk that the tow maybe terminated due to power failure of the tug aircraft, loss of position of the glider with respect to the tug or failure of the tow rope, (although other causes are possible). The risk is attempting to manoeuvre the aircraft (Glider or Tug) with insufficient airspeed causing control failure at low heights. It is generally accepted that the safest action is to land ahead unless there is sufficient height to recover a safe manoeuvring airspeed and then return to the airfield. A controlled landing ahead into a poor field is preferred to losing control due to a slow and poorly coordinated turn in an attempt to reach a suitable landing area. The BGC considers it would lose 25% of the landing space options from runway 15, slightly less on runways 07 and 19. *5.24 The risks of an unsafe landing could potentially be mitigated by the introduction of a clear area through the solar installation along the runway centre lines. A suitable designated area would be some 400m long x 50m wide and free from obstruction.* *5.25 It is a complicated and difficult task coaching trainees, allowing them to practise, make and recognise their mistakes and correct them while the situation can still be managed safely by the instructor.* *5.26 Anything which introduces additional hazards will increase the risk.*	An estimated 80% of land, remains available for runway direction 19 after consideration of the land being developed for the proposed development. This is due to the solar development being located outside the areas defined for emergency landing. An estimated 75% of land remains available from runway threshold 15 after consideration of the land being developed for the proposed development. Areas 'straight ahead' from runway 15 remain available, which is generally accepted as the safest action. The impact of the proposed development upon areas available for an emergency landing from runway15 is still greater than the existing areas available from runway 01, to which there is a village and major road network.
BGC-10	Burn Gliding Club	*Bird Strike* *5.27 There is the risk of increased bird activity as they may be attracted by the solar panels. Preventing bird strikes on aircraft near a new solar farm installation is crucial for both aviation safety and protecting wildlife. Solar farms can attract birds, which may be drawn to the reflective surfaces of solar panels, mistaking them for*	Whilst the Applicant is aware of the hypothesised issued raised here the Applicant is not aware of any evidence that it has actually occurred. The Applicant is not aware of any records of waterbirds attempting to land on solar farms which have been mistaken as lakes, nor of any evidence of increases of numbers of waterbirds around solar farms.

Reference	Theme	Issue Raised	Applicant's Response
		waterbodies (a phenomenon known as the "lake effect"). Implementing the following measures can help mitigate: *Wildlife and Bird Deterrence:* *Use of Anti-Reflective Coatings on Solar Panels. This can reduce the "lake effect," where birds mistake solar panels for water bodies.* *Bird Deterrence Methods - Visual Deterrents: Install reflective or moving objects like flags, streamers, or balloons that can scare birds away.* *Sound Deterrents: Use auditory systems that emit a noise which scares birds.*	With regard to bird deterrents, To the Applicant's knowledge this has been solely in relation to solar panels which are floated on reservoirs, and which some species (usually gulls) may use as a perch rather than rest/roost on the water surface as they more typically would. Deterrents are installed so as to minimise the effects of bird droppings on the panel surfaces but this is not proposed here as the routine maintenance and cleaning of the panels will address this.
BGC-11	Burn Gliding Club	*Conclusion on Risks* *5.28 In conclusion on this matter, it is clear that there is insufficient information in the application to demonstrate that key aviation safety issues have been adequately addressed. The applicant should undertake this work prior to the Examination to allow BGC to review. BGC at this point therefore maintains its objections to this application.* *5.29 The 'High-Level' report in February concluded, 'No significant impacts are predicted upon aviation activity associated with Burn Airfield…' Based on the failure to address these issues in detail that conclusion is flawed. At Appendix 5 we include a report relating to Pocklington Airfield. This shows the level of detail expected, particularly addressing the likely increase in thermal effects.* *5.30 There has been no further engagement since April. Document EN010140/APP/6.3.2.5, Environmental Statement, Appendix 2.5: Solar Photovoltaic Glint and Glare Study appears to be the only document that Helios has submitted with this application of relevance to Burn Gliding Club.*	The Solar Photovoltaic Glint and Glare Assessment **[APP-117]** will be updated to address glare concerns pertaining to the circuits at Burn Airfield to ensure a representative view of the potential effects towards the Airfield is captured. There is no specific guidance pertaining to the assessment of glider launch failure, turbulence, updraft, windshear and electromagnetic effects from solar developments upon aviation. The Applicant has completed an assessment of these areas within the High-Level Investigative Report in accordance with industry best practice and previous project experience. The Applicant is willing to continue engagement with the Club to resolve and/or better understand their concerns

Reference	Theme	Issue Raised	Applicant's Response
		5.31 Appendix 2.5 of the Environmental Statement only considers the approach and not the standard circuit. which are flown at variable heights above the ground and distance and headings the only safe mitigation would be to exclude the solar area from the circuit area which because of the unpredictable nature of the weather conditions, pilot ability and glider characteristics would have a very significant, adverse, impact on the club's activities. *5.32 The applicant has completely ignored the operation of a gliding club with regard to flying standard gliding circuits which are managed to arrive at the final turn at a safe height and position to allow an accurate approach leading to the intended stopping point with options for a safe alternative.* *5.33 The applicant has completely ignored the measures needed to ensure safe emergency landings.* *5.34 At the present time, therefore, the proposed development is contrary to Government policy as set out in Section 6 below.*	
BGC-12	Burn Gliding Club	*Recreation, Aviation and Planning Policy* *6.1 Sport England, established by Royal Charter in 1996 is committed to give everyone in England the chance to benefit from sport and physical activity. Its 10-year vision is to transform lives and communities through sport and physical activity. The National Governing Bodies of the Air Sports recognised by Sport England are: British Aerobatic Association British Balloon and Airship Club British Gliding Association British Hang Gliding and Paragliding Association British Microlight Aircraft Association British Model Flying Association British Skydiving Light Aircraft Association Royal Aero Club of Great Britain* *6.2 The sites used by these Air Sports are therefore designated as 'Sports Venues'.*	Noted, no response required.

Reference	Theme	Issue Raised	Applicant's Response
BGC-13	Burn Gliding Club	*Planning policy support for recreation and general aviation activities* *6.3 The National Planning Policy Framework (using the current (as at September 2024) draft revision paragraph references) at paragraph 86(d) states that 'Planning policies and decisions should enable: the retention and development of accessible local services and community facilities, such as …. meeting places, sports venues, open space…'* *6.4 In Chapter 8, Promoting healthy and safe communities, Paragraph 94c states 'Planning policies and decisions should aim to achieve healthy inclusive and safe places which enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities….and layouts that encourage walking and cycling.'* *6.5 Paragraph 100 states: 'Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.'* *6.6 Paragraph 101 continues: ' Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: 14 a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed*	The NPPF contains a number of policies relating to the promotion of healthy and safe communities, however, policies in relation to airfields do not specifically refer to the protection of airfields for recreational purposes. Burn airfield is not designated as open space and as such policies requiring an assessment of any potential loss of open space are not applicable. The Applicant notes that Burn Gliding Club responded to North Yorkshire's 'Call for Sites' proposing the Burn Field should be identified as a key recreational facility and that, to date, this has not been taken forward by North Yorkshire Council. The Applicant notes the references made by Burn Gliding Club to the General Aviation Strategy, 2015 and the Flightpath to the Future, 2022, however these strategy documents reference the potential wider benefits from a gliding club. The Applicant considers that these documents have limited, if any, weight in the consideration of the application. The Proposed Development will have no impact on the wider recreational uses which the land occupied by the gliding club. The Applicant has undertaken a Solar Photovoltaic Glint and Glare Assessment **[APP-117]**. The Assessment concludes that mitigation is required for the approach path towards runway 25 at Burn Airfield. The Applicant is proactively engaging with Burn Gliding Club in respect of the matters raised in its Relevant Representation **[RR-043]** in respect of glint and glare.

Reference	Theme	Issue Raised	Applicant's Response
		development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.' *6.7 In respect of planning policy support for general aviation activity (which includes gliding) is set out in Section 9, Promoting sustainable transport. Paragraph 108(f) states that 'Planning policies should recognise the importance of maintaining a national network of general aviation airfields, and their need to adapt and change over time – taking into account their economic value in serving business, leisure, training and emergency service needs, and the Government's General Aviation Strategy'.* *6.8 NPPF paragraph 193 sets out the basis of the 'agent of change' that states that new development should be integrated effectively with existing community facilities and mitigation may be required where new development could significant adverse effects. This was explicitly applied to aviation by Planning Practice Guidance Paragraph: 012 Reference ID: 30-012-20190722. The impact of a solar voltaic proposal on aviation and the 'agent of change' provisions formed a significant reason for the refusal of North Yorkshire (Hambleton) application 21/03042/FUL on 26 January 2023. This is a microlight airfield, not a gliding site.* *6.9 The General Aviation Strategy, 2015, specifically highlights gliding as a Case Study, It states:* *'Case Study –* • *Gliding is a significant part of the GA community. The British Gliding Association (BGA) told us that there are 84 clubs in the UK with some 9,000 members, of which 7,000 are regular participants and around 6,000 are active pilots. Gliding is the*	The Applicant is undertaking additional assessment work in connection with the activities of Burn Gliding Club and this will be submitted at a future Deadline. It is not possible to state which deadline at this stage as it is dependent on receiving information from Burn Gliding Club.

Reference	Theme	Issue Raised	Applicant's Response
		"affordable way of flying" being significantly cheaper than powered flight. • *Cross country gliding is a very popular element of the sport and usually involves a 'triangular' course passing defined waypoints and returning to home base, but sometimes requires landing at an alternative aerodrome or in a field if the conditions are unfavourable. In the hands of an experienced pilot, and with the right conditions, a glider can cover as much as 300 kilometres in a single trip.* • *BGA regards gliding as a sport activity rather than a transport mode, and its primary social benefit is as a recreational activity, providing physical and mental health benefits to participants. Although its direct and indirect benefits are captured in our economic assessment as a sub-sector of GA, its wider benefits form a component of the larger and significant economic benefits that derive from sports activity in the UK.* • *Wider benefits are also derived from tourism impacts. An example of these benefits would be The Scottish Gliding Centre. The Scottish Gliding Centre operates 15 with a combined turnover of around £0.4M. The club is typical in that it is open to all and, weather permitting, provides a national, regional and community asset that is open all year round and encourages visitors to the area.* • *A conservative estimate of visitor spending in the region is £100 per bed night and, during one year, the Scottish Gliding Centre recorded 407 person-weeks booked (167 glider-weeks) equivalent to 2,849 bed nights. This equates to £0.29M of income to the local tourist economy. These visitors support local bed and breakfast establishments, hotels, restaurants and other leisure facilities, as well as playing a significant part in the finances of the club.*	

Reference	Theme	Issue Raised	Applicant's Response
		• *The SGC represents 64% of gliding membership in Scotland. However, its reliance on visitors is much less than other clubs in Scotland. Making the assumption that a gliding club's financial turnover is directly proportional to the size of its membership, and allowing for their increased percentage reliance on visitors, the value of visitors to the Scottish tourist industry as a whole is conservatively estimated at £0.45M per annum. Source: British Gliding Association.'* *6.10 Flightpath to the Future, 2022, sets out a Ten Point plan for the future of UK Aviation and states:* *'Make the UK the best place in the world for General Aviation – recognise the important role General Aviation plays in providing domestic and international connectivity for a range of areas. This includes business, sport and leisure, training and emergency services. It also supports businesses and aviation services, including maintenance and manufacturing firms. We also recognise the important role General Aviation, and businesses within General Aviation, play in supporting innovation, decarbonisation and skills. We will continue to work in partnership with the CAA and the sector to implement our ambitious General Aviation Roadmap. In addition, we will ensure we seize opportunities from leaving the EU, including making further changes to improve the regulatory environment.' [Our emphasis]* *6.11 The Department for Transport, 'General Aviation Handbook' 2023 explains the purpose of the document: 'This handbook outlines the long-term economic, social, and infrastructural value that GA airfields and supporting GA activities can provide'. It states: 'GA airfields frequently host community, sporting and charity events and offer a range of recreational opportunities. In some areas the airfield may be the only green space in or near an urban area and are a valuable space bringing communities together. They also offer*	

Reference	Theme	Issue Raised	Applicant's Response
		opportunities for environmental enhancement – such as wildflower meadows – which can contribute to biodiversity aims and gains.' It identifies 'types' of GA airfields and states: 'Airfields form the critical infrastructure to support the GA sector and come in a multitude of different shapes and sizes. A GA airfield can range from a large site 16 capable of handling large jets with advanced navigational infrastructure to smaller grass strips comprising of aircraft hangars and recreational and sports facilities.' *6.12 Taking account of the above, the BGC responded to North Yorkshire's 'Call for Sites' in June 2024 proposing the Burn Field should be identified as a key recreational facility serving the local and wider area, with potential for its recreational use to be enhanced for the benefit of residents. This process is ongoing.*	
BGC-14	Burn Gliding Club	*Conclusions* *7.1 The BGC supports renewable energy projects in principle. However, their location and design should not adversely impact general aviation activities. It is clear that the potential adverse impacts on Burn Airfield arising from this proposed development have not been adequately or properly assessed by the Applicant.* *7.2 There is also a cumulative effect of this proposal with other developments – such as the wind turbines near Eggborough – which makes the risks outlined above harder to manage.* *7.3 BGC is willing to continue to engage with Helios and Pager Power to see if there are measures that could genuinely avoid harm to the users of the site and the Club itself. As submitted this application is unacceptable, for all of the reasons set out above, BGC objects strongly to it and will continue its objection through the next stages of the DCO process.*	The Applicant does not accept that there are unacceptable impacts on Burn Gliding Club. The Applicant is proactively engaging with Burn Gliding Club in respect of the matters raised in its Relevant Representation **[RR-043]**. The Applicant is undertaking additional assessment work in connection with the activities of Burn Gliding Club and this will be submitted at a future Deadline.

Table 2.9 – Civil Aviation Authority [RR-072]

Reference	Theme	Issue Raised	Applicant's Response
CAA-01	Burn Gliding Club	*The Combined Aerodrome Safeguarding Team (CAST) is a team set up by industry in collaboration with the UK CAA with a purpose to provide information, guidance and input to new policy and legislative updates through focus groups that concentrate on technical matters, regulation and legislation, general aviation and training. As part of the focus group concentrating on renewable energy schemes, an advice note, 'Advice Note 5: Renewable Energy Developments' has been published which sets out the relevant safeguarding considerations applicable to solar farms. The guidance states that: It is essential to conduct an aviation perspective glint and glare assessment when a reflective surface is to be located on or immediately adjacent to an aerodrome. In most cases, an assessment should be undertaken for a solar energy development which is being proposed within a specific distance from an aerodrome as determined by the aerodrome authority. For many aerodromes, 5km is the distance of choice but it could be considered out to 10km. [Paragraph 2.2.1, Advice Note 5]* *Furthermore, the guidance considers additional safety impacts:* • *Engine failure after take-off (EFATO)* • *Physical safeguarding* • *Birds and wildlife* • *Rescue and firefighting services (RFFS)* • *Communication, navigation and surveillance (CNS)*	Glint and glare effects have been assessed within the Solar Photovoltaic Glint and Glare Assessment **[APP-117]**. Glider launch failure, windshear, turbulence, updraft, and electromagnetic fields and interference have been assessed within 11606E High Level Investigative report.
CAA-02	Burn Gliding Club	***2.1 Burn airfield - current operation*** *Burn Airfield, formerly RAF Burn is a former RAF satellite station located 5 miles south of Selby and 0.5 miles east of Burn in North Yorkshire. Today, the site is an unlicensed aerodrome operated by*	Noted, no response required.

Reference	Theme	Issue Raised	Applicant's Response
		Burn Gliding Club who have operated out of the site for 40 years. The gliding club operate all three runways: • *Runway 01/19 (length 1100 metres)* • *Runway 07/25 (length 1300 metres)* • *Runway 15/33 (length 950 metres)* • *The site is operated three days a week and owing to the hard runway surface, operates all year round. When operational there are an average of 70 aircraft movements a day, made up of recreational and training flights.*	
CAA-03	Burn Gliding Club	***2.2 Aerodrome Safeguarding*** *Aerodrome safeguarding is the process by which aerodrome operators aim to ensure that their aerodrome and its surrounding airspace is not adversely affected by proposed development. Consultation between a local planning authority and an aerodrome operator is obligatory by statutory direction where development is proposed near to aerodromes defined in the ODPM/DfT Circular 01/2003 'Safeguarding of Aerodromes, Technical Sites & Military Explosives Storage Areas Direction'1. Such aerodromes are "officially safeguarded".* *Burn Airfield is not an officially safeguarded aerodrome and therefore not afforded a "call in" opportunity when an LPA is minded to grant permission contrary to an aerodrome's objection. However, the CAA set out in their safeguarding guidance, 'CAP 738: Safeguarding of Aerodromes' that:* *Operators of licensed aerodromes which are not officially safeguarded, and operators of unlicensed aerodromes and sites for other aviation activities (for example gliding or parachuting) should take steps to protect their locations from the effects of possible adverse development by establishing an agreed consultation*	A Solar Photovoltaic Glint and Glare Study **[APP-117]** and a High-Level investigative report have been completed to consider the potential impact upon aviation safety and operations. The Applicant is undertaking additional assessment work in connection with the activities of Burn Gliding Club and this will be submitted at a future Deadline. is not possible to state which deadline at this stage as it is dependent on receiving information from Burn Gliding Club.

Reference	Theme	Issue Raised	Applicant's Response
		procedure between themselves and the local planning authority. [Section 2.3, CAP 738] *Furthermore, whilst there is no specific guidance on how impact to aviation by solar farms should be assessed, there is general safeguarding guidance issued by the CAA in CAP 738 which references solar farms: Safeguarding is the process by which the Aerodrome Operator can, in consultation with the Local Planning Authority (LPA) and within their capability, protect the environment surrounding the Aerodrome from developments and activities that have the potential to impact on the aerodrome's safe operation. Aerodrome safeguarding covers several aspects. Its purpose is to protect…. …(h) aircraft from the risk from glint and glare, e.g. solar panels. [Section 1,1, CAP 738]*	
CAA-04	Burn Gliding Club	***3. Glint and glare assessment*** *A 'Solar Photovoltaic Glint and Glare Study' (PINS document number: EN010140/APP/6.3.2.5) accompanies this proposal. We provide our comments by looking at the assessment methodology and conclusion of the assessment.*	Noted, no response required.
CAA-05	Burn Gliding Club	***3.1 Assessment methodology*** *The aviation receptors that have been derived for the glint and glare assessment have been determined by selecting "locations along the extended runway centre line from 50ft above the runway threshold out to a distance of 2 miles. The height of the aircraft is determined by using a 3-degree descent path relative to the runway threshold height". Figure 1 provides an extract from the glint and glare assessment to illustrate the locations where receptors were identified.* *This method doesn't take into consideration the full extent of Burn Gliding Club's operation. A gliding operation doesn't operate in such*	Burn Airfield were consulted on the 7/12/2023 following completion of the glint and glare study to better understand their concerns. Glint and glare concerns pertaining to approach paths and visual circuits were not identified within this meeting. The Applicant is undertaking additional assessment work in connection with the activities of Burn Gliding Club and this will be submitted at a future Deadline. is not possible to state which deadline at this stage as it is

Reference	Theme	Issue Raised	Applicant's Response
		a linear environment as that presumed. This assessment states that its criteria was derived through consultation with stakeholders. This extent of stakeholder engagement is not clear however, as we understand that the gliding club were not consulted on this glint and glare assessment.	dependent on receiving information from Burn Gliding Club.
CAA-06	Burn Gliding Club	***3.2 Interpretation of results*** *There is some inconsistency in the presentation of results within the glint and glare assessment. Section 7.1.2 states that, "the results of the Forge modelling and the yellow glare are presented in Appendix B." Firstly, there are no results given in Appendix B, and those that are given in Appendix H are limited; only results for the approach to runway 25 at Burn Airfield are given.* *Despite a limited scope of assessment, there are estimates of yellow glare for approaches to all runways at Burn Airfield. In Appendix D of the glint and glare assessment, a useful flow chart is given which sets out the steps to mitigation following a glint and glare assessment (see Figure 2).* *According to the flow chart, where a maximum intensity of 'potential for temporary after-image' applies then the options recommended are to either mitigate impact or consult with the aerodrome to determine whether mitigation is required.* *For some approaches to the runways at Burn Airfield, the yellow glare results have been discounted because it is assumed to impact aircraft outside of Burn Gliding Club's operational hours. We reaffirm that there has been no consultation with Burn Gliding Club following the derivation of these estimated results. The gliding club should be consulted regarding the assessor's proposed mitigation measures to ensure they are adequate and appropriate.*	The results are provided within Appendix H of the Solar Photovoltaic Glint and Glare Assessment **[APP-117]** and this mistype can be updated. Appendix H details that the full modelling outputs can be provided upon request; selected results have been included to represent the receptors where mitigation has been requested. The operational hours of the airfield can be found publicly on their website at: **https://burnglidingclub.co.uk/contact-1**. Consultation via Teams video call were undertaken with Burn Airfield on the 7/12/23 and 12th April 2024. Written consultation between Stantec and Burn Airfield was also undertaken in between these dates to obtain further information regarding their concerns. The Applicant is undertaking additional assessment work in connection with the activities of Burn Gliding Club and this will be submitted at a future Deadline. is not possible to state which deadline at this stage as it is dependent on receiving information from Burn Gliding Club.

Reference	Theme	Issue Raised	Applicant's Response
		We note that the results for the approach to runway 25 at Burn Airfield, suggests further discussion is required as to the extent of mitigation that might be required, as yellow glare is predicted throughout the assumed operational hours of Burn Gliding Club. In summary, there is clear indication that Burn Gliding Club is likely to be impacted by the proposal and they should be consulted with regards to how the impact could be mitigated.	
CAA-07	Burn Gliding Club	***4. Additional Matters*** *There are further matters in addition to glint and glare that should be considered to fully understand the potential impact to the operation at Burn Airfield. Such issues were shared earlier in this document in Section 1 when we provided an excerpt from CAST guidance:* • *Engine failure after take-off (EFATO)* • *Physical safeguarding* • *Birds and wildlife* • *Rescue and firefighting services (RFFS)* • *Communication, navigation and surveillance (CNS)* *Not all considerations may be relevant to operations at all aerodromes. In this context, engine failure after take-off is particularly eye catching due to the proximity of this proposal to Burn Airfield. Whilst it is not the aerodrome operator's responsibility to identify and secure off aerodrome landing solutions, it is accurate to state that development in the vicinity of an aerodrome can reduce emergency landing site options to pilots. The probability of survival should an aircraft hit these new obstacles should be understood.* *Furthermore, whilst this is a document that has been produced in response to a request by Burn Gliding Club, we note that Cliffe Airfield should also be consulted following these results and any further investigation that may be undertaken.*	Glider launch failure, windshear, turbulence, updraft, and electromagnetic fields and interference have been assessed within 11606E High Level Investigative report. Glider launch failure has been considered rather than engine failure after take-off due to the nature of the aircraft departing from the airfield. Cliffe Airfield will be consulted following this recommendation.

Reference	Theme	Issue Raised	Applicant's Response
CAA-08	Burn Gliding Club	***5. Conclusion*** *We have identified relevant policies and legislation that emphasise the importance of understanding the impact of any proposed renewable energy project to aviation safety.* *Specifically, this proposal has sought to assess how glint and glare might affect both Burn Airfield and Cliffe Airfield. Significant impact (yellow glare) to pilots on approach to both airfields is anticipated during certain times of the day and year, necessitating thorough engagement with the airfields to fully comprehend how this impact could be mitigated. Additionally, additional matters require investigation to address all the relevant considerations relating to the safeguarding of aerodromes.*	The Solar Photovoltaic Glint and Glare Assessment **[APP-117]** will be updated to include the assessment of visual circuits. is not possible to state which deadline at this stage as it is dependent on receiving information from Burn Gliding Club. Cliffe airfield will be consulted.

Table 2.10 – Environment Agency [RR-117]

Reference	Theme	Issue Raised	Applicant's Response
EA-01	Groundwater source protection	***Additional Requirements are necessary:*** 1. *A Requirement for a Hydrogeological Risk Assessment and follow up actions (as proposed in the Environmental Assessment and Flood Risk Assessment). This is needed to protect groundwater levels and flow.*	This is consistent with the recommendations contained in the Flood Risk Assessment (FRA) **[APP-232]** and Water Environment ES Chapter 9 **[APP-029]**. Paragraphs 3.50 – 3.52 of the FRA **[APP-232]** and paragraphs 9.5.67 and 9.6.4 – 9.6.5 of the ES Chapter 9 **[APP-029]** discuss this matter. In accordance with the EA's recommendation, an additional DCO Requirement will be agreed with them and then added to the dDCO.
EA-02	Groundwater source protection	2. *A Requirement for a Piling Risk Assessment and follow up actions (as proposed in the Environmental Assessment and Flood Risk Assessment). This is needed to protect groundwater quality. Please see Appendix 2 for suggested text for these Requirements.*	This is consistent with the recommendations contained in the Flood Risk Assessment (FRA) **[APP-232]** and Water Environment ES Chapter 9 **[APP-029]**. Paragraphs 3.50 – 3.52 of the FRA **[APP-232]** and paragraphs 9.5.67 and 9.6.4 – 9.6.5 of the ES Chapter 9 **[APP-029]** discuss this matter. In accordance with the EA's recommendation, an additional DCO Requirement will be agreed with them and then added to the dDCO.
EA-03	Construction site management	***2. Amended Requirements*** 3. *We request that the wording of Requirement 4 is amended to ensure the Construction Environmental Management Plan (CEMP) applies to site preparation works.* 4. *We request that the wording of Requirement 4 is amended to include that the CEMP is approved by the*	The principle of amending DCO Requirement 4 to reference site preparation works and referencing consultation with the EA is acceptable. The wording of DCO Requirement 4 will be agreed with them and then amended n.

Reference	Theme	Issue Raised	Applicant's Response
		local planning authority in consultation with the Environment Agency.	
EA-04	Protective provisions	***3. Protective Provisions*** *We do not agree the wording of the protective provisions included in Part 4 of Schedule 9 of the draft DCO. However the wording is close to what we can agree and for that reason with minor amendments we see no reason why we should not be able to agree the wording of the protective provisions within the examination period. We cannot agree to the disapplication of the requirement for a flood risk activity permit until we have agreed the wording of the protective provisions.*	The wording of the protective provisions included in Part 4 of Schedule 9 of the dDCO will be reviewed in consultation with the EA and amended wording will be agreed in due course before being added to the dDCO.
EA-05	BESS floodplain compensation	***4. Remaining risks to the Environment which have not been addressed*** • *We require further detail as to how the flood risk compensation scheme as proposed in the Flood Risk Assessment will be secured to ensure this development does not cause flood risk elsewhere. This detail should include phasing of works to ensure that there will be no net loss of floodplain during construction.*	In relation to the flood compensation scheme Paragraph 4.147 of the FRA **[APP-232]** states: *'The timing to deliver the floodplain compensation scheme for the Substation and BESS Compound taking into account the realisation of the climate change scenarios over the operational lifespan of the Proposed Development would be kept under review as part of a Flood Management Strategy for the Site. The Flood Management Strategy for the Site would be secured by a suitably worded DCO Requirement requiring details to be submitted to and approved by the Local Planning Authority based on the EA approved site-specific flood model.'* Paragraph 4.172 of the FRA **[APP-232]** states: *'The Flood Management Strategy for the Site would keep under review the need to implement a level for level floodplain compensation scheme for the Substation and BESS Compound to mitigate the effect of the earth flood defence bund. A*

Reference	Theme	Issue Raised	Applicant's Response
			preliminary floodplain compensation scheme within the DCO limits has been shown to be feasible and could be provided on the Site. If required to be implemented, the adaptation measures would ensure that flood risk as a result of the earth flood defence bund would not increase on the Site or elsewhere.' This approach is reflected in paragraphs 9.5.16, 9.5.78, and 9.9.8 of the ES Chapter 9 **[APP-029]**. Inspection of Drawing No. E216/150 contained in Appendix 11 and Drawing No. E216/153 contained in Appendix 14 of the FRA **[APP-234]** show that the requirement for floodplain compensation for the Substation and BESS Compound is not required in either the defended Tidal or Fluvial 'design flood' and would only be required in the defended Fluvial 'credible maximum climate change scenario' (Drawing No. E216/154 Appendix 15 of the FRA **[APP-234]**). The timing of the delivery of the floodplain compensation scheme is dependent on if the credible maximum climate change scenario comes to pass over the operational lifespan of the development. The Flood Management Strategy for the Site will be secured by a suitably worded DCO Requirement and will contain the mechanism for review of the need to implement a floodplain compensation scheme for the Substation and BESS Compound against climate change scenarios over the operational lifespan of the development. The wording of the DCO Requirement will be agreed with the EA and then added to the dDCO.
EA-06	Operation of the development	• *No details have been provided covering operation in times of flood, to include clearance of debris and*	The Applicant has provided the following details which it is discussing with the EA.

Reference	Theme	Issue Raised	Applicant's Response
	in times of flood	*contingency in the event of failure of remote operation of solar panels.*	With respect to operation of the development in times of flood paragraph 4.186 of the FRA **[APP-232]** states: *'The Proposed Development is not 'occupied' and therefore there is no risk to users (construction, operation and decommissioning staff) of the development. Construction or occasional maintenance activities would be scheduled to avoid periods of elevated flood risk. During times of elevated flood risk, no personnel would be onsite and access to the Proposed Development would be restricted. Therefore, due to its 'unoccupied' nature, the Proposed Development would be safe for users in times of flood. Sensitive plant would be able to be shut down and restarted remotely in response to a flood alert. When a flood alert / warning is issued the Proposed Development would be evacuated as a precautionary measure using the local highway network in accordance with the Proposed Development's flood warning and evacuation plan.'* For the avoidance of doubt no personnel would be onsite during a flood event to avoid putting operational staff at risk. Any clearance of debris or general clean up or repair of equipment after flood waters have receded shall be included in the OEMP which will be secured by DCO Requirement 7. The oOEMP **[APP-124]** will be amended accordingly. With respect to the rotation of solar panels paragraph 3.3 of the FRA **[APP-232]** states: *'The lower edge of the panels would be up to 0.9m above ground level at the maximum rotation and the horizontal stow position would be approximately 2m above ground level.'* This references ES Figure 3.4 - Solar PV Panel Elevations **[APP-041]**.

Reference	Theme	Issue Raised	Applicant's Response
			Paragraph 4.165 of the FRA **[APP-232]** states: *'From an inspection of Figure 4 it can be seen that when the solar arrays are rotated to a horizontal stow position, the solar panels would be approximately 2m above ground level. The maximum depth of flooding in Solar Farm Zone during the fluvial 'design flood' is predominately <0.3m with one isolated low spot in the northwest corner of Field Number 42 where flood waters are up to 1.3m. The stow position is therefore significantly above the fluvial 'design flood' level. The outputs of the site-specific flood modelling demonstrate that the minimum freeboard allowances for the stow position of the solar arrays could be achieved. The solar panels would be raised above the fluvial 'design flood' and therefore safe from flooding and could continue to operate safely during these conditions.'* Even at full rotation the lower edge of the solar panel would be a minimum 0.9m above ground level (Table 3.2 ES Chapter 3 **[APP-023]**) and the majority of solar panels would still be raised above the fluvial 'design flood' with only a very limited area of Field 42 having a residual risk if rotating solar arrays would stop functioning in the fluvial 'design flood'. Due to the nature of the flood risk in the fluvial 'design flood' (predominately <0.9m deep, except in Field No. 42) there is an inherent flood resilience built into the design. This minimises the need for additional contingency planning.
EA-07	Equipment levels	• *Finished floor levels for the built development must be set at 300mm above the design flood.*	It is considered the Proposed Development complies with this guidance.

Reference	Theme	Issue Raised	Applicant's Response
			The solar farm equipment that has a 'finished floor level' would be the Inverter Field Stations **[APP-043]** and the equipment associated with the Substation and BESS compound **[APP-044-048]**. Parameters associated with the equipment are specified in Table 3.2 ES Chapter 3 **[APP-023]**. Paragraph 4.126 of the FRA **[APP-232]** states: *'In line with normal construction practice, it is proposed that any on site buildings would have floor levels raised at least 0.3m (and up to 0.6m) above existing ground level with appropriate damp proof course protection. This would ensure that the interior of any such building is kept suitably dry.'* Paragraph 4.127 of the FRA **[APP-232]** states: *'The location of ancillary control equipment would be preferentially located in areas of very low surface water flood risk and very low fluvial flood risk in the fluvial 'design flood' and in areas affected by flood depths <0.6m in the fluvial 'credible maximum scenario sensitivity test' flood event.'* Paragraph 4.132 of the FRA **[APP-232]** states: *'The Substation and BESS Compound would be situated to avoid areas of elevated surface water flood risk and the fluvial 'design flood' extents.'* Paragraph 4.137 of the FRA **[APP-232]** states: *'The BESS containers would be raised at least 0.3m (and up to 0.6m) above ground which provides additional protection from the ingress of surface water within the bunded area.'*

Reference	Theme	Issue Raised	Applicant's Response
			Through the sequential design approach of the site, locating the Inverter Field Stations, Substation and BESS Compound outside of areas affected by the fluvial 'design flood' (where the flood depth is therefore zero) the minimum floor level of +0.3m above ground level (and up to +0.6m) would therefore be at least +0.3m above the design flood and comply with the EA's guidance.
EA-08	Flood Risk Assessment	• *No calculations have been presented within the Flood Risk Assessment to confirm that the volume of flood water displaced by the solar panel supports is negligible.*	Paragraph 4.121 of the FRA **[APP-232]** states: *'The minimal cross-sectional area and spacing of the PV panel supports and equipment framework would allow the free flow of flood waters around the base of the structures. The shape of the panels' supports would be designed to allow the free passage of water around the support. The presence of the panel supports in flood risk areas would not materially impede water flows due to their small size, cross sectional profile and wide spacing (typically one panel support on a solar array for every 8-9m).'* Paragraph 4.124 of the FRA **[APP-232]** states: *'Due to the nature of the proposed equipment in the area of elevated flood risk, the volume of flood water displaced by the PV panel supports and fence posts is negligible in the context of the wider floodplain and flood waters could flow freely around the panel supports, base of the structures, and security fence.'* Calculations to confirm that the volume of flood water displaced by the solar panel supports is negligible will be submitted at Deadline 2.

Reference	Theme	Issue Raised	Applicant's Response
EA-09	Groundwater source protection	• *No details have been provided regarding operational pollution prevention measures in the routine management of drainage from BESS compound.*	Paragraph 5.71 of the FRA **[APP-232]** states: '*SuDS is proposed for managing the disposal of surface water runoff from the Proposed Development associated with the BESS Compound (including the Substation). It is proposed that the runoff from the BESS compound would be collected by a series of filter drains in three sub-catchments. Flows would be conveyed to the filter collector drains by overland flows and via sub surface flows within the porous subbase of the BESS compound. Filter drains would then convey runoff to three attenuation basins designed with sediment forebays to enhance water quality and promote sediment deposition. Runoff would be discharged at a controlled rate into the onsite drainage ditches/watercourses.'* Paragraph 5.75 of the FRA **[APP-232]** states: *'The outfalls would be fitted with penstocks to allow for containment during a contamination event.'* The design of the SuDS for the BESS compound includes measures to treat surface water as it flows through the drainage system (predominately by sediment deposition in the SuDS Features) and a penstock as a failsafe device to contain a pollution event. The routine maintenance of the SuDS features and the BESS Compound will include regular inspections for pollution events. This will be specified in the OEMP, secured by DCO Requirement 7. In addition, further details of sediment removal from the SuDS will be provided in the OEMP. The oOEMP **[APP-124]** will amended accordingly. As a failsafe, a water quality device (such as a downstream defender supplied by Hydro International, or similar approved) will be fitted to the outfall from

Reference	Theme	Issue Raised	Applicant's Response
			the SuDS features to further safeguard quality of day to day runoff from oils, debris and sediments. This will be specified in the FRA **[APP-232 to APP-235]** and on Drawing No. E216/88 contained in Appendix 25.
EA-10	Land contamination	• *No protocol has been provided in Outline CEMP for if unexpected contaminated land is identified during ground investigation or construction.*	The oCEMP **[APP-121]** includes commentary on Pollution Prevention (section 3.11) as a result of works associated with the Proposed Development, however the Applicant does acknowledge that this does not make reference to unexpected existing contamination discovered during construction works. The Applicant will update section 3.11 Pollution Prevention of the oCEMP to include the following measures to reduce the risk of unexpected contamination: • Construction workers will receive an awareness briefing regarding ground conditions and appropriate methods of working to limit disturbance of potentially contaminated soil or water, where possible. • A contamination watching brief and discovery protocol will be prepared, requiring consultation with the Environment Agency if unexpected land contamination is encountered during ground investigation or construction, the protocol will include: o Measures to minimise exposure to contaminated soils e.g., by controlling dust generation (in line with a Dust Management Plan) and the adoption of good hygiene standards will prevent prolonged skin contact, inhalation, and ingestion of soils during construction; and

Reference	Theme	Issue Raised	Applicant's Response
			○ Measures to minimise and control runoff/leaching to Controlled Waters (as detailed in section 3.5 Flood Risk and Drainage of the oCEMP). These measures will sit alongside the current pollution prevention measures and pollution response plan outlined in the oCEMP.
EA-11	Consents and Licences	• *No consideration has been made of the potential need for water abstraction licences for consumptive uses, in addition to licences for dewatering that have already been identified*	The need for water abstraction is considered to be limited in the construction, operation and decommissioning of the Proposed Development. If water abstraction is required, the appropriate consent (abstraction licence) would be sought at the time. This is confirmed in the Consents and Licences Position Statement [APP- 008]
EA-12	Groundwater source protection	***Issues relating to Water Environment*** *APP-232: Flood Risk Assessment (Part 1 of 4)* *APP-124: Environmental Statement* *Appendix 5.4 - Outline OEMP Groundwater Source Protection Para 3.42-3.54* *Issue - The BESS Compound drainage infrastructure will under normal operation discharge via attenuation ponds into on-site drainage ditches/watercourses. There is potential for connectivity between these unlined water bodies and the underlying Aquifer.*	As per response to EA-09. The oOEMP **[APP-124]** will be updated to include routine maintenance of the SuDS features and regular inspections for pollution events and other operational controls to monitor for, prevent, and manage spills and leaks within the BESS compound. The drainage design for BESS compound could be updated to provide a water quality device on the outfall from the SuDS features to intercept oils, debris and sediments.

Reference	Theme	Issue Raised	Applicant's Response
		Impact - Contamination arising from spills and leaks in the BESS compound could infiltrate into the underlying Aquifer via drainage into surface water courses. *Solution - Provide outline operational controls to monitor for, prevent, and manage spills and leaks within the BESS compound in outline OEMP, and provide detailed controls in Site Maintenance Plan.*	
EA-13	Groundwater source protection	*APP-029: Environmental Statement* *Chapter 9: Water Environment* *Issue - As of August 2024, the definition of source protection zones has changed slightly to allow for better clarification (how long it will take groundwater to reach the source, rather than pollutant) - Groundwater source protection zones (SPZs) - GOV.UK (www.gov.uk)* *Impact - Failure to use this revised definition may result in non-compliance with guidance.* *Solution - Consider this definition in any HRA/Piling Risk Assessments and other documents to be submitted*	A Hydrological Risk Assessment and Piling Risk Assessment would need to take into account guidance at the time of the assessment. However, a Requirement will be agreed with the EA and then the dDCO will be amended accordingly. The definition of SPZs in Paragraph 3.44 of the FRA **[APP-232]** will be updated for completeness.
EA-14	Consents and Licences	*APP-029: Environmental Statement* *Chapter 9: Water Environment;* *APP-113: Environmental Statement* *Appendix 2.3 Construction Dust Risk Assessment;* *APP-008 Consents and Licences Position Statement* *Issue - Consumptive use of water is not identified in the construction or operational phases as described in the Environmental Statement Chapter 9. For example, Appendix 2.3 describes mitigation measures which include dust*	As per response to EA-11. If water abstraction is required the appropriate consent (abstraction licence) would be sought at the time. The oCEMP **[APP-121]** will be amended to reference the potential requirement for an Abstraction Licence from the Environment Agency.

Reference	Theme	Issue Raised	Applicant's Response
		suppression techniques and wheel washing. The Consents and Licences Position Statement identifies the need for an abstraction licence for dewatering activities, but does not consider other consumptive uses. The use of surface water or groundwater for other consumptive uses will also be subject to licensing. *Impact - Failure to consider the need to apply for water abstraction licences may cause unexpected delays to the works. Licensing may come with restrictions which restrict access during low flows, prolonged dry weather and drought, and may need contingency planning for times of unavailability.* *Solution - Amend Consents and Licences Position Statement Table 1 to include consumptive use of water. Amend the oCEMP to include mention of potential requirement for Abstraction licence from the Environment Agency. The subsequent detailed CEMP should identify where water is to be sourced from, and highlight that any required licences must be secured prior to their requirement.*	
EA-15	Consents and Licences	*APP-008: Consents and Licences Position Statement* *Comment - The Consents and Licences Position Statement identifies the potential for licences being required for dewatering. More information about the criteria for exemption can be found in The Water Abstraction and Impounding (Exemptions) Regulations 2017 Section 5: Small scale dewatering in the course of building or engineering works, and when a discharge permit is required if it falls outside of our regulatory position statement for de-watering discharges.*	Consents (abstraction licence / discharge permit) would be sought at the at the appropriate time when details of construction and operation are available. Works would need to comply with the guidance / legislation at the time of construction/operation/decommissioning of the Proposed Development.

Reference	Theme	Issue Raised	Applicant's Response
EA-16	Construction site management	*APP-121: Environmental Statement* *Appendix 5.1 - Outline CEMP (OCEMP)* *Issue - Requirement 4(2) of the Draft DCO states that CEMP must include a protocol in the event that unexpected contaminated land is identified. This protocol is not included in the Outline CEMP.* *Impact - Unexpected contamination could be encountered during construction works, which if not appropriately managed could result in the mobilisation of contaminants into controlled waters (groundwaters within SPZ1 and SPZ3) and a detrimental impact to controlled water.* *Solution - Provision in the revised Outline CEMP for a contamination watching brief and discovery protocol, requiring consultation with the Environment Agency if unexpected land contamination is encountered during ground investigation or construction.*	As per response to EA-10. A protocol for addressing unexpected contaminated land shall be included in the detailed CEMP which will be secured by DCO Requirement 4. The oCEMP **[APP-121]** will be amended accordingly.
EA-17	Groundwater source protection	*APP-006: Draft Development Consent Order Requirements* *Issue - No Requirement for Hydrogeological Risk Assessment currently provided in draft DCO. Paragraph 9.6.4 of Chapter 9 of the ES, and paragraph 3.52 of the FRA state that the implications of the development proposals on physical disturbance of the aquifer and on groundwater levels or flow relating to the proposed trenchless utility crossing at the railway will be determined via a Hydrogeological Risk Assessment and that his will be secured by a suitably worded DCO requirement.*	As per response to EA-01. The principle of a DCO Requirement securing these measures is acceptable and the wording will be agreed with the EA and then added to the dDCO.

Reference	Theme	Issue Raised	Applicant's Response
		Impact - Failure to carry out the Hydrogeological Risk Assessment could result in unacceptable impacts to groundwater characteristics arising from construction. *Solution - Include a Requirement for Hydrogeological Risk Assessment for proposed trenchless utility crossing of railway, with any arising contingency works. Details to be submitted to and approved by the Local Planning Authority, in consultation with the Environment Agency, prior to construction works commencing.*	
EA-18	Groundwater source protection	*APP-006: Draft Development Consent Order Requirements* *Issue - No Requirement for Piling Risk Assessment currently included in draft DCO. Paragraph 9.65 of the ES proposes a Piling Risk Assessment for piled foundations within SPZ1, to be secured by DCO requirement.* *Impact - Foundation piling works could cause physical disturbance or create contaminant pathways, potentially impacting controlled waters (groundwater quality) within SPZ1.* *Solution - Provide a Requirement in DCO for production of a full Piling Risk Assessment for any piled structures proposed within SPZ1, and a Piling Method Statement for areas of the site outwith the SPZ1 to minimise risks to Secondary A and Principal Aquifers'. Requirement to include implementation of any arising contingency works. Details to be submitted to and approved by the Local Planning Authority in consultation with the Environment Agency prior to construction works commencing.*	As per response to EA-02. The principle of a DCO Requirement securing these measures is acceptable and the wording will be agreed with the EA and then added to the dDCO.

Reference	Theme	Issue Raised	Applicant's Response
EA-19	Construction site management	*APP-006: Draft Development Consent Order Requirement 4 Part 1 Article 2: Interpretation* *Issue - Requirement states: No phase of the authorised development may commence until a CEMP for that phase has been submitted to and approved by the local planning authority. "commence" is interpreted to mean to carry out any material operation (as defined in section 155 of the 2008 Act) forming part of the authorised development other than the site preparation works (except where stated to the contrary). Therefore, site preparation works could commence without the benefit of CEMP.* *Impact - Risk to the environment during site preparation works.* *Solution - Amend wording of Requirement 4 or the definition of "commence" to ensure CEMP applies to site preparation works.*	As per response to EA-03. The principle of amending the DCO Requirement 4 to reference site preparation works is acceptable. The wording will be agreed with the EA and then added to the dDCO.
EA-20	Construction site management	*Requirement 4* *Issue - Requirement 4(1) of the Draft DCO prevents the Applicant from commencing any phase of construction before the local planning authority has approved the CEMP for that phase. We request to be consulted on the initial CEMP submission prior to the commencement of site preparation works and construction.* *Impact - The CEMP provides essential mitigation to prevent impacts from sedimentation and pollution from construction sites. We often encounter construction sites that have caused pollution because their CEMP was either insufficient or was not adhered to.*	As per response to EA-03. The principle of amending DCO Requirement 4 to reference consultation with the EA is acceptable. The wording will be agreed with the EA and then added to the dDCO.

Reference	Theme	Issue Raised	Applicant's Response
		Solution - We request to be consulted on the CEMP to be approved under Requirement 4 and ask that part 1 of this Requirement is re-worded as follows: "No phase of the authorised development may commence until a CEMP for that phase has been submitted to and approved by the local planning authority in consultation with the Environment Agency. Any CEMP submitted for approval must be in accordance with the outline CEMP and any approved CEMP must be adhered to for the duration of the works in the phase of the authorised development to which the CEMP relates."	
EA-21	Development Consent Order	*Article 18(7)* *Issue - Article 18(7) could be more accurately worded. Regulation 12 of the Environmental Permitting (England and Wales) Regulations 2016 prohibits the operation of a regulated facility or the causing or knowingly permitting a water discharge activity or groundwater activity except under and to the extent authorised by an environmental permit.* *Impact - Lack of drafting clarity can cause difficulties with interpretation.* *Solution - Redraft to state that nothing in Article 18 overrides the requirement for an environmental permit under regulation 12(1) of the Environmental Permitting (England and Wales) Regulations 2016.*	The wording of Article 18(7) will be reviewed. The wording will be agreed with the EA and then the dDCO amended.
EA-22	Construction site management	*APP-121: Environmental Statement* *Appendix 5.1 - Outline CEMP (OCEMP)* *Comment - We would like to offer the following advice to aid in the development of an effective detailed CEMP:*	The detailed CEMP, secured by DCO Requirement 4, will take into account advice on monitoring, auditing and oversight in accordance with good practice. The oCEMP **[APP-121]** will be amended accordingly.

Reference	Theme	Issue Raised	Applicant's Response
		• *Section 2.15.1: This section confirms that the Site Manager will undertake monitoring and auditing to ensure compliance with the detailed CEMP. Appropriate monitoring within a dedicated plan is required, such as an Environmental Monitoring Plan, to ensure that it is carried out routinely.* • *Section 2.15.3: This section states that a Non-Conformance Report will be created in the event that monitoring identifies non-compliance with the CEMP. Oversight of contractors by an applicant is a key control mechanism to ensure compliance with a CEMP and the implementation of appropriate pollution prevention measures. We recommend that the detailed CEMP secures an obligation for the Principal Contractor to share Non-Conformance Reports with the Applicant to ensure oversight is maintained.* • *Appendix 1: The Environmental Permitting (England and Wales) Regulations 2016 have not been mentioned within the Legislative Framework list. These Regulations are the principal legislation which controls water discharge activities, and therefore pollutions, and should be included within the list of relevant legislation.*	The legislative Framework list will be updated to reference The Environmental Permitting (England and Wales) Regulations 2016.
EA-23	Flood Risk Assessment	***Issues relating to Flood Risk*** *APP-232 Flood Risk Assessment* *Section 4.124 Solar Array Support Structures* *Issue - The risk of flooding has not been adequately assessed. No calculations have been presented within the Flood Risk Assessment to demonstrate that the volume of*	As per response to EA-08. Calculations to confirm that the volume of flood water displaced by the solar panel supports is negligible will be submitted at Deadline 2.

Reference	Theme	Issue Raised	Applicant's Response
		flood water displaced by the solar panel supports is negligible. *Impact - The Flood Risk Assessment lacks the technical detail to allow displacement of flood water to be accurately assessed.* *Solution - Use the area volume method to provide the volumetric displacement of the solar panel arrays in the design scenario and the potential impact on levels that this might have across the study area to demonstrate the displacement of flood water and confirm that this is negligible and would not increase flood levels.*	
EA-24	Equipment levels	*Section 4.126 & 4.134 Finished floor levels* *Issue - Finished floor levels of all built development are to be set a minimum of 0.3m above ground level. This does not take into consideration the water level in a design flood event and the impacts of climate change, resulting in insufficient mitigation for the 'credible maximum scenario'.* *Impact - The failure to raise finished floor level to the adequate level may cause the proposed development to be at risk of flooding.* *Solution - Raise all finished floor levels to a minimum of 300mm above the design flood level.*	As per response to EA-07. It is considered the Proposed Development complies with this guidance. Through the sequential design approach of the site locating the Inverter Field Stations and Substation and BESS Compound outside of areas affected by the fluvial 'design flood' (where the flood depth is therefore zero) the minimum floor level of +0.3m above ground level (and up to +0.6m) would therefore be at least +0.3m above the design flood and comply with the EA's guidance.
EA-25	Flood Risk Assessment	*Section 4.142-4.147 Appendix 19 Floodplain compensation* *Issue - The flood action plan proposed in Section 4.116 includes remotely rotating the solar panel arrays to a safe horizontal position. However, the applicant has not provided a contingency plan for if this remote system is to fail, and the*	As per response to EA-06. Any clearance of debris or general clean up or repair of equipment after flood waters have receded could be included in the detailed OEMP which will be secured by DCO Requirement 7 requiring details will be submitted to and approved by the

Reference	Theme	Issue Raised	Applicant's Response
		necessary freeboard allowance cannot be achieved. Additionally, the applicant has failed to provide a maintenance plan for the clearance of debris which may become caught during the time of a flood. *Impact - Failure of the remote system in times of flood may lead to the solar panels not being raised above the flood water. This occurrence results in an increased risk to the development, and the solar planes becoming unsafe and/or not operational in times of a flood.* *Solution - A contingency plan is required for the remote operation of the solar panels to deal with the risk of failure or evidence that the solar panels will remain safe during times of a flood. A maintenance plan is required to ensure any build-up of debris during a flood event is cleared when safe.*	Local Planning Authority. The oOEMP **[APP-124]** will be amended accordingly. Regular maintenance of the solar arrays would reduce the risk of failure of the rotating mechanism. Regular maintenance of equipment in areas of elevated flood risk could be set out in the OEMP. Due to the nature of the flood risk in the fluvial 'design flood' (predominately <0.9m deep, except in Field No. 42) there is an inherent flood resilience built into the design. This minimises the need for additional contingency planning.
EA-26	Flood Risk Assessment	*Section 4.142-4.147 Appendix 19 Floodplain compensation* *Issue - Flood compensation has not been adequately addressed. A floodplain compensation scheme is proposed (as shown in FRA Appendix 19) as mitigation for the loss of floodplain and impeding flow routes. There is no confirmation that this will be taken forward. Part 2 of the Exception Test requires the applicant to demonstrate, via a site-specific flood risk assessment (FRA), that the development will be safe without increasing flood risk elsewhere and, where possible, the development should reduce flood risk overall.* *Impact - Failure to confirm steps to reduce flood risk overall.* *Solution - Amend wording of FRA to commit to the proposed floodplain compensation scheme and include the scheme in Works Plans as part of the DCO.*	As per response to EA-05 Inspection of Drawing No. E216/150 contained in Appendix 11 and Drawing No. E216/153 contained in Appendix 14 of the FRA **[APP-234]** show that the requirement for floodplain compensation for the Substation and BESS Compound is not required in either the defended Tidal or Fluvial 'design flood' and would only be required in the defended Fluvial 'credible maximum climate change scenario' (Drawing No. E216/154 Appendix 15 of the FRA **[APP-234]**. The timing of the delivery of the floodplain compensation scheme is dependent on if the credible maximum climate change scenario comes to pass over the operational lifespan of the development. The Flood Management Strategy for the Site will be secured by a suitably worded DCO Requirement and will contain the mechanism for review of the need to implement a floodplain

Reference	Theme	Issue Raised	Applicant's Response
			compensation scheme for the Substation and BESS Compound against climate change scenarios over the operational lifespan of the development. The wording will be agreed with the EA before then being added to the dDCO.
EA-27	Flood Risk Assessment	*Section 4.33 Site Specific Flood Model* *Issue - The Flood Risk Assessment refers to reporting and information which has since been superseded by a more recent hydraulic model report The Flood Risk Assessment is based on the May 2024 site specific flood model and model report. The model reporting for this is provided in Appendix 10. The final model technical note is dated 25th June 2024. These latest hydraulic model report should be included and referenced in the Flood Risk Assessment.* *Impact - Lack of clarity regarding flood model versions.* *Solution - Please include the latest version of the Flood Modelling Technical Note (June 2024) as an appendix to the Flood Risk Assessment. Please ensure that this is referenced in the Flood Risk Assessment*	Appendix 10 of the FRA **[APP-232, 233 & 234]** will be updated to reference latest version of the Hydraulic Model Technical Note (June 2024) produced by Aegaea. For the avoidance of doubt, the flood modelling outputs assessed as part of the FRA have not changed. The only change is the additional sensitivity testing provided in Section 6 of the Hydraulic Model Technical Note. The sensitivity testing does not impact the conclusions of the FRA.

Table 2.11 – National Gas Transmission [RR-123]

Reference	Theme	Issue Raised	Applicant's Response
NGT-01	National Gas Infrastructure	*The Applicant is seeking temporary and permanent rights over several plots containing NGT existing infrastructure or land owned by NGT, [including parcels 19, 32, 39, 40, 45, 46, 47 and 49]. NGT will require appropriate protection for retained apparatus including compliance with relevant standards for works proposed within close proximity of its apparatus. NGT's rights of access to inspect, maintain, renew and repair such apparatus must also be maintained at all times and access to inspect and maintain such apparatus must not be restricted. Further, where the Applicant intends to acquire land or rights, or interfere with any of NGT's interests in land or NGT's apparatus, NGT will require appropriate protection and further discussion is required on the impact to its apparatus and rights. Further detail is set out below.* *NGT have infrastructure within the proposed Order Limits NGT owns or operates the following infrastructure within the proposed Order Limits for the Project: The transmission pipeline form an essential part of the gas transmission network in England, Wales and Scotland: Transmission Pipelines: • Feeder 29 – Asselby to Pannal*	The Applicant is in communication with National Gas Transmission in respect of its Relevant Representation and the need for Protective Provisions in respect of their infrastructure . Therefore, the Applicant has not responded in detail to the points raised in their RR at this time.
NGT-02	Protective provisions	***Protection of NGT Assets*** *As a responsible statutory undertaker, NGT's primary concern is to meet its statutory obligations and ensure that any development does not impact in any adverse way upon those statutory obligations. As such, NGT has a duty to protect its position in relation to infrastructure and land which is within or in close proximity to the draft Order Limits. As noted, NGT's rights to retain its apparatus in situ and rights of access to inspect, maintain, renew and repair such apparatus located within or in close proximity to the Order Limits should be maintained at all times and access to inspect and*	The Applicant is in communication with National Gas Transmission in respect of its Relevant Representation and the need for Protective Provisions in respect of their infrastructure. Therefore, the Applicant has not responded in detail to the points raised in their RR at this time.

Reference	Theme	Issue Raised	Applicant's Response
		maintain such apparatus must not be restricted. NGT will require protective provisions to be included within the draft Development Consent Order (the "Order") for the Project to ensure that its interests are adequately protected and to ensure compliance with relevant safety standards. NGT is liaising with the Applicant in relation to such protective provisions, along with any supplementary agreements which may be required. NGT requests that the Applicant continues to engage with it to provide explanation and reassurances as to how the Applicant's works pursuant to the Order (if made) will ensure protection for those NGT assets which will remain in situ, along with facilitating all future access and other rights as are necessary to allow NGT to properly discharge its statutory obligations. NGT will continue to liaise with the Applicant in this regard with a view to concluding matters as soon as possible during the DCO Examination and will keep the Examining Authority updated in relation to these discussions.	
NGT-03	Compulsory Acquisition	***Compulsory Acquisition Powers in respect of the Project*** *As noted, where the Applicant intends to acquire land or rights, or interfere with any of NGT's interests in land, the protective provisions must require that the Applicant obtain NGT's consent to any such land or rights. NGT objects to the compulsory acquisition of its assets, land or rights over its land in the absence of inclusion of its standard form protective provisions. NGT will require further discussion with the Applicant. NGT reserves the right to make further representations as part of the Examination process in relation to specific interactions with its assets but in the meantime will continue to liaise with the Applicant with a view to reaching a satisfactory agreement.*	The Applicant is in communication with National Gas Transmission in respect of its Relevant Representation and the need for Protective Provisions in respect of their infrastructure . Therefore, the Applicant has not responded in detail to the points raised in their RR at this time.

Table 2.12 – Historic England

Reference	Theme	Issue Raised	Applicant's Response
HE-01	Cultural Heritage	*Historic England has an interest in this project because there are highly graded listed buildings nearby to the red edge of the proposed development site. Therefore there is a potential that the setting of these heritage assets could be harmed by the development. We therefore advise a need for these potential impacts to be appropriately explored and considered as part of the examination process. This would then allow the examining authority to come to a balanced planning decision. Some of the assets whose settings may be affected by the development include:* • *Camblesforth Hall (GI)* • *Carlton Towers (GI)* *For any consideration of the historic environment outside of our statutory remit we would defer to the local authority to determine the potential impact of built heritage and/or archaeology which may also be affected by the proposal.*	ES Chapter 6 Cultural Heritage **[APP-026]** considered the assets mentioned by Historic England in their response, as these were also identified as having the potential to have their significance affected by the scheme through changes to setting. The Applicant's assessment identified no harm upon Camblesforth Hall and a minor adverse effect (at the lower end of 'less than substantial harm') upon Carlton Towers. The Applicant is seeking agreement on these matters through a Statement of Common Ground with Historic England, a draft of which was submitted at Procedural Deadline A **[PDA-002]**.

Table 2.13 – Keir Mather MP [RR-190]

Reference	Theme	Issue Raised	Applicant's Response
KM-01	Multiple	*This submission has been formed after seeking representations from residents in Camblesforth and the surrounding villages. I am submitting it as the local Member of Parliament and it forms the outline of further submissions regarding the application.* • *That the solar farm is to be built on high quality agricultural land that produces high quality food and grain.* • *That there is a risk of undermining our country's self-sufficiency if all of the planned solar farms are granted planning permission.* • *That there will be a significant impact on the natural biodiversity in the local area due to the scale of the proposed solar farm.* • *A perceived risk of fire, flooding and contamination of local water supplies, particularly from the lithium within the batteries.* • *An apparent lack of communication between the local Parish council and the developers.* • *A risk of a decrease in property value.* • *Increased traffic on already busy roads and pollution during construction of the solar farm.*	The impact of the Proposed Development on agricultural land is assessed in ES Chapter 14 Soils and Agricultural Land **[APP-034]**. It concludes that the construction phase will have a moderate adverse (not significant) residual effect in terms of loss of Best and Most Versatile agricultural land, and the operational phase will have a moderate or minor adverse (not significant) residual effect on farm business and a neutral effect on BMV. Paragraph 2.6.21 to 2.6.25 of the Alternative Site Assessment (ASA) **[APP-227]** set out the justification for the use of provisional Grade 2 agricultural land. As shown in Figure 2.7 of the ASA, the majority of the land within a 5km radius of the point of connection is either Grade 1 or Grade 2. The Grade 3 land within the 5km radius is not available for development due to existing uses and planning applications occupying these areas. The impact of the Proposed Development on biodiversity is assessed in ES Chapter 8 Biodiversity **[APP-028]**. It is concluded that there will no significant adverse effects on biodiversity as a result of the Proposed Development. There will be significant beneficial effects on non-statutory designated sites, habitats and breeding birds as a result of the operational phase. As set out in ES Chapter 8 **[APP-028]**, Defra's Statutory Biodiversity Metric Calculation Tool show that the Proposed Development will result in an increase in biodiversity of 55.70% in Habitat Units, 61.11% in Hedgerow Units and 9.05% in watercourse units.

Reference	Theme	Issue Raised	Applicant's Response
			The risk of flooding is assessed as part of the Flood Risk Assessment (FRA) **[APP-232]**. Paragraphs 5.79 – 5.83 of the FRA **[APP-232]** consider the management of fire water to safeguard water quality. The Consultation Report **[APP-181]** sets out the consultation between the Applicant and interested parties/stakeholders prior to the submission of the Application. This includes engagement with Camblesforth Parish Council. The Applicant is not aware of any empirical evidence to suggest that the presence of solar farms affects nearby property values. In any event, property value is not a material planning consideration. The assessment in ES Chapter 10 Transport and Access **[APP-030]** concludes that the construction phase vehicle movements would have a negligible residual effect on road user and pedestrian safety, severance, road drive vehicle delay, non-motorised user delay and in terms of the effects of hazardous/large loads. The construction phase is assessed to have a minor adverse (not significant) residual effect on non-motorised user amenity (including fear and intimidation).

Table 2.14 – National Grid Electricity Transmission [RR-266]

Reference	Theme	Issue Raised	Applicant's Response
NGET-01		*The Applicant is seeking temporary and permanent rights over several plots owned by, or containing, NGET assets including those shown on pages 1 & 2 of the Land Plans and referenced in the draft DCO as Works Number 4, 4A, 5, 6, 6A and 9.*	The Applicant is communicating with National Grid Electricity Transmission in respect of its Relevant Representation and the need for Protective Provisions in respect of their assets. Therefore, the Applicant has not responded in detail to the points raised in their RR
NGET-02		***NGET's Statutory Duties*** *As a responsible statutory undertaker, NGET's primary concern is to meet its statutory obligations and to ensure that any development does not adversely affect those statutory obligations. NGET has a duty to protect its position in relation to infrastructure and land which is within or in close proximity to the draft Order Limits. Additionally, NGET must protect its future proposed infrastructure. NGET will therefore require appropriate protection for retained or proposed apparatus, including compliance with relevant standards for works proposed within close proximity of its apparatus or proposed apparatus. NGET's rights of access to inspect, maintain, renew and repair such apparatus must be maintained at all times and access to inspect and maintain such apparatus must not be restricted. Further, where the Applicant intends to acquire land or rights, or interfere with any of NGET's interests in land or NGET's apparatus, NGET will require appropriate protection. Further discussion and agreement with the Applicant is required in relation to the impact on its apparatus and rights. Existing NGET Apparatus NGET owns and operates two 400kV overhead lines, a 132kV substation and a 66kV substation that are located within and in close proximity to the Order Limits for the Project. These assets form an essential part of the electricity transmission network in England and Wales. The details of the electricity assets are as follows:* • *Drax1 132kV substation.*	The Applicant is communicating with National Grid Electricity Transmission in respect of its Relevant Representation and the need for Protective Provisions in respect of their assets. Therefore, the Applicant has not responded in detail to the points raised in their RR at this time.

Reference	Theme	Issue Raised	Applicant's Response
		• *Camblesforth 66kV substation.* • *4VJ 400kV OHL – Drax - Eggborough 1; Drax – Eggborough 2.* • *4VH 400kV OHL – Drax – Keadby – Thorpe Marsh; Drax – Thorpe Marsh.* • *Camblesforth to Drax 66kV underground cable.* • *Associated fibre cables Future NGET Apparatus .*	
NGET-03		*Furthermore, based on information currently available, NGET has identified potential interfaces between the Project and the NGET infrastructure project Eastern Green Link 2 (EGL2). These proposals are part of NGET's Great Grid Upgrade – the largest overhaul of the grid in generations. NGET infrastructure projects across England and Wales are connecting additional renewable energy to homes and businesses.* *EGL2 is a high voltage direct current (HVDC) electrical 'superhighway' cable link to be built between Peterhead in Aberdeenshire and Drax in North Yorkshire. The EGL2 project involve a mix of offshore and onshore development and consent for the English components were sort and granted under a CPO. Consent for the CPO was granted on 24th August 2024. There is a direct interaction between the Project and EGL2 to the east of Drax 1 along New Road. As construction timelines are likely to interact it is therefore essential that the Project accommodates this interaction and that the protective provisions ensure that future working can be agreed between the parties and that there are no restrictions which would prevent this. NGET must ensure adequate projection for its future projects both in terms of protection for future assets and future land and rights for the delivery of these projects.* *Overarching National Policy Statement (NPS) for Energy EN-1 states that "[t]o support the achievement of the transition to net zero, government is accelerating the co-ordination of the development of*	The Applicant is communicating with National Grid Electricity Transmission in respect of its Relevant Representation and the need for Protective Provisions in respect of their assets. Therefore, the Applicant has not responded in detail to the points raised in their RR at this time.

Reference	Theme	Issue Raised	Applicant's Response
		the grid network to facilitate the UK's net zero energy generation development" (para 4.11.3). This is reflected in the NPS for Renewable Energy Infrastructure EN-3 which states at paragraph 2.8.34 that "a more co-ordinated approach to offshore-onshore transmission is required." In line with good practice and the new policy considerations in the updated Energy NPS', particularly EN-5, which requires that "2.14.2 the construction planning for the proposals has been co-ordinated with that for other similar projects in the area on a similar timeline;" *NGET will co-operate on co-ordination in respect of EGL2 and seek to develop co-ordination and co-operation in the same localities with regards to EGL2.*	
NGET-04	Protective provisions	*Protection of NGET Assets NGET will require Protective Provisions to be included within the draft Development Consent Order (the "Order") for the Project to ensure that assets existing at the time of construction of the Project are adequately protected and to ensure compliance with relevant safety standards. NGET also requires that the Protective Provisions include protection for its future assets including the EGL2 project.* *The Awel Y Mor DCO provides a precedent for the protection of future assets via Protective Provisions. NGET is liaising with the Applicant in relation to such Protective Provisions. Accordingly, NGET has not appended the version of the Protective Provisions it requires to be included in the Order to this Relevant Representation. However, NGET will submit these at Written Representation Stage, if not agreed between the parties by that point, with an explanation of any outstanding issues.* *NGET requests that the Applicant continues to engage with it in relation to how the Applicant's works pursuant to the Order (if made) will ensure protection for those proposed NGET assets, along with*	The Applicant is communicating with National Grid Electricity Transmission in respect of its Relevant Representation and the need for Protective Provisions in respect of their assets. Therefore, the Applicant has not responded in detail to the points raised in their RR at this time.

Reference	Theme	Issue Raised	Applicant's Response
		facilitating all future access and other rights as are necessary to allow NGET to properly discharge its statutory obligations. NGET will continue to liaise with the Applicant in this regard with a view to concluding matters as soon as possible during the DCO Examination and will keep the Examining Authority updated in relation to these discussions.	
NGET-05	Protective provisions	***Compulsory Acquisition Powers in respect of the Project*** *Where the Applicant seeks powers of compulsory acquisition over NGET land or rights, the Protective Provisions must require that the Applicant obtain NGET's consent to any compulsory acquisition of any such land or rights. NGET reserves the right to make further representations as part of the Examination process in relation to specific interactions with its EGL2 project, or any NGET projects identified during the Examination process, and as negotiations continue, but in the meantime will continue to liaise with the Project with a view to reaching a satisfactory agreement during the Examination process and will keep the Examining Authority updated in relation to these discussions.*	T The Applicant is communicating with National Grid Electricity Transmission in respect of its Relevant Representation and the need for Protective Provisions in respect of their assets. Therefore, the Applicant has not responded in detail to the points raised in their RR at this time.

Table 2.15 – National Highways [RR-267]

Reference	Theme	Issue Raised	Applicant's Response
NH-01	Transport and Access	*The development site relative to the Strategic Road Network [SRN],* • *7.5km to the west of the M62 junction 36 [M62 J36];* • *5km to the northwest of the M62 / M18 junction; and* • *6km to the northeast of the M62 junction 34 [M62 J34].*	Noted, no response required.
NH-02	Book of Reference	***National Highways Land Interests*** *National Highways is listed in the Book of Reference has having an interest, as owner, in respect of plots 48 and 49. This is incorrect. National Highways is responsible for the trunk road network in England. And whilst I can confirm that National Highways does show as holding title to the land in question. It was acquired for the construction of the A1041 when the road was a part of the trunk road network. This road has now been de trunked so is no longer part of the trunk road network. By virtue of Section 265 of the Highways Act 1980, the de-trunking order has transferred ownership of the highway and the subsoil of the A1041 to the local highway authority (LHA). This means that ownership vests in the LHA even though National Highways remains the registered owner. The transfer of registered proprietorship is just an administrative exercise that has not yet been undertaken. Ownership, maintenance, and responsibility for the operation of this road transferred to the LHA when the road was de trunked. The Land Registry information in this regard is out of date and this has now been flagged internally within National Highways for rectification. The Book of Reference should be updated accordingly, and the LHA should respond with any comments in relation to plots 48 and 49.*	The Book of Reference **[APP-010]** will be updated accordingly.
NH-03	Transport and Access	***Transport Travel Planning & Construction Traffic Management Plans***	Travel planning and construction management measures are contained within the oCTMP **[AS-006]**.

Reference	Theme	Issue Raised	Applicant's Response
		I note that Circular 01/22 is not referenced in the policy section of the transport assessment (TA). Notwithstanding this I have reviewed the TA, travel plan (TP) and outline construction traffic management plan (OCTMP) with consideration to Circular 01/22. In terms of the construction phase, it is noted that 210 two-way trips are forecast for the peak day of construction, 52 of which are HGV trips. All trips are forecast to route via M62 J36 over an anticipated 12-month period of construction. I acknowledge and welcome the travel planning and construction management plan measures being proposed to ensure that movements to and from the development site will be effectively managed and, wherever possible, undertaken outside of peak hours. Provided that these measures are delivered it is considered that the construction phase of this development will not result in a severe impact on the SRN.	The CTMP is secured by Requirement 6 of the dDCO **[AS-007]**.
NH-04	Transport and Access	*In terms of the operational phase, there are anticipated to be around five visits to the site per month for maintenance purposes (less than one trip per day on average). These would typically be made by light van or 4x4 type vehicles. As such, it is accepted that the operational phase of the development will have a negligible impact on the SRN.*	Noted, no response required.
NH-05	Transport and Access	*However, to protect our network I request that the following, or suitably worded alternative requirements, be applied to any grant of consent:* *1) Requirement: Construction Traffic Management Plan - Unless otherwise agreed in writing by the Local Planning Authority in consultation with National Highways (or its successors), no construction shall commence unless and until a detailed Construction Phase Traffic Management Plan has been submitted to and approved in writing by the Local Planning. Thereafter the construction shall be undertaken in accordance with the approved plan*	The CTMP is secured by Requirement 6 of the dDCO **[AS-007]**

Reference	Theme	Issue Raised	Applicant's Response
		2) Reason: To manage construction traffic impacts for the M62 and ensure the safe and efficient operation of the SRN. We note that the CTMP should include at least the following: • *A dust management plan.* • *A noise management plan.* • *Pollution prevention measures.* • *Staffing numbers.* • *Contractor parking.* • *Construction traffic routes.* • *Measures to limit traffic movements via the SRN during peak hours.* • *Details of delivery arrangements (including for any abnormal loads);* • *• Measures to manage transfer of debris on to the highway.*	
NH-06	Transport and Access	*2) Requirement: Decommissioning Traffic Management Plan Unless otherwise agreed in writing by the Local Planning Authority in consultation with National Highways (or its successors) decommissioning of the development hereby approved shall not commence unless and until a Decommissioning Traffic Management Plan has been submitted to and approved in writing by the Local Planning Authority in consultation with National Highways (or its successors). Thereafter unless otherwise approved in writing decommissioning shall be undertaken in accordance with the approved plan.* *Reason: To manage decommissioning traffic impacts for the M62 and ensure the safe and efficient operation of the SRN. The inclusion of the above decommissioning condition is required to ensure that National Highways is sighted on the decommissioning phase traffic management plan at the appropriate time as the operation of the SRN will have changed in the intervening years.*	A Decommissioning Traffic Management Plan is secured via Requirement 5 of the dDCO **[AS-007]**.

Table 2.16 – Natural England [RR-268]

Reference	Theme	Issue Raised	Applicant's Response
NE-01.1	**International Designated Sites** Humber Estuary SPA Humber Estuary Ramsar Lower Derwent Valley SPA Lower Derwent Valley Ramsar .	Potential loss of functionally linked land (FLL) for the relevant qualifying bird features of the listed SPA / Ramsar sites and comments on the conclusions of the HRA.	Attached at Appendix B is the Applicant's current position in relation to Functionally Linked Land. The Appendix provides clarity on the methodology adopted for the assessment and the consideration of FLL. In summary, the Applicant considers that the methodology and information provided is sufficient. Natural England make reference to their paper *'Evidence review of the impact of solar farms on birds, bats and general ecology 2016 (NEER012)*', the Applicant has reviewed this paper with regard to the Proposed Development and notes that the paper includes generic information only and that all points relevant to the Proposed Development have been addressed in the ES.
NE-01.2		Potential loss of functionally linked land (FLL) for the relevant qualifying bird features of the listed SPA / Ramsar sites and comments on Ornithology report (APP-145)	Natural England provide a number of comments on the desk study aspect of the assessment, and request a comparison of desk study records and field survey results and further assessment to demonstrate how this informs conclusions of the HRA, the Applicant's response is set out below with regard to these points: • **Compare desk study to field results** – the Applicant will provide this information at a future deadline. • **Consultation with county ecologist** – the Applicant has previously consulted with the NYC ecologist in May 2023 and December 2023. • **Consultation with local bird groups and other organisations that may hold relevant**

Reference	Theme	Issue Raised	Applicant's Response
			information – the Applicant will (if available) obtain records from the local bird club with specific records for the Site including a 500m buffer. • **Use of the BTO's WeBs data to examine the collected survey data against peak bird counts for the estuary as a whole, and for the most relevant sectors** – the Applicant will provide a comparison for the Humber Estuary overall population and will consult with Natural England to determine the relevant sections of the Humber SPA. • **A desk-based assessment using aerial photography, mapping, habitat maps and relevant ecological literature of the suitability for SPA birds of the habitats present on the proposed site and adjacent fields** - the Applicant will provide this information at a future deadline. With regard to Wintering/passage bird surveys the Applicant will provide the relevant figures of the transect routes, explanation regarding the data collection and varied coverage, and clarification on the peak count of Lapwings and how this is calculated at a future deadline Finally, Natural England welcome the inclusion of Nocturnal surveys (January to March 2024) though wish to see more justification around the sufficiency of the surveys. The Applicant considers, that based on the current survey information (both daytime and nocturnal) there is no evidence of FLL on Site and therefore the survey work is appropriate, the Applicant will provide the further justification requested at a future deadline.

Reference	Theme	Issue Raised	Applicant's Response
NE-01.3		Potential loss of functionally linked land (FLL) for the relevant qualifying bird features of the listed SPA / Ramsar sites and comments on Ornithology HRA	The Applicant agrees that the additional information requested under NE1.2 (above) will be incorporated into the HRA. Regarding the definition of FLL this is considered in Avian technical note (Appendix B). The Applicants' position is that Natural England has not provided a clear definition of FLL against which an assessment can be made. This matter will be addressed through further consultation with Natural England and the re-presentation of the updated HRA. Natural England has requested additional information to be assessed in addition to 1% rule and cropping information, the Applicant will provide additional assessment of key species (lapwing, golden plover only). The Applicant notes the points made by NE and will continue to engage with them to agree the approach to be taken.
NE-02		Noise and visual disturbance during construction to potential FLL for the relevant qualifying bird features of the listed SPA/Ramsar sites	The Applicant will provide further assessment of construction noise and disturbance along grid corridor to field 339.
NE-03		Operational impacts (visual disturbance) to any adjacent FLL for the relevant qualifying bird features of the listed SPA / Ramsar sites	The Applicant will provide an updated HRA with consideration of Appendix 2.5 Solar Photovoltaic Glint and Glare Study **[APP-117]** at a future deadline.
NE-04	**International Designated Sites**	Potential air quality impacts from construction traffic on international designated sites.	The Applicant will provide the relevant air quality information within the HRA and an updated copy will

Reference	Theme	Issue Raised	Applicant's Response
	All relevant international designated sites		be issued to Natural England for review at a future deadline.
NE-05	**International Designated Sites** River Derwent SAC Lower Derwent Valley SAC Humber Estuary SAC	Potential impacts on the designated features of the River Derwent SAC, Lower Derwent SAC and Humber Estuary SAC - Natural England note that the River Derwent SAC, Lower Derwent SAC and Humber Estuary SAC are also designated for mobile features including otter and fish and there are unlikely to be impacts on these sites and they will not raise this through examination.	The Applicant acknowledges Natural England's comments regarding the River Derwent SAC, Lower Derwent SAC and Humber Estuary SAC and agree that there are unlikely to be impacts on these sites and welcome that Natural England will not raise this through examination **[RR-268].**
NE-06	**International Designated Sites** Skipworth Common SAC Thorne Moors SAC	Potential impacts on the designated features of Skipworth Common SAC and Thorne Moors SAC – Natural England identifies that impacts to Skipworth Common SAC and Thorne Moors SAC are unlikely.	The Applicant agrees with Natural England that impacts to Skipworth Common SAC and Thorne Moors SAC are unlikely **[RR-268].**
NE-07	**International Designated Sites** Thorne and Hatfield Moors SPA	Potential impacts on breeding nightjar associated with Thorne and Hatfield Moors SPA	Both parties agree that significant effects on breeding nightjar associated with Thorne and Hatfield Moors SPA are unlikely and the Applicant will provide an updated HRA at a future deadline.
NE-08	**International Designated Sites** In-combination impacts on all relevant	In-combination impacts on all relevant international designated sites	The Applicant will provide an updated cumulative assessment with consideration of East Yorkshire Solar Farm and will be provided at a future deadline.

Reference	Theme	Issue Raised	Applicant's Response
	international designated sites		
NE-09	**International Designated Sites** All relevant international designated sites	General advice on HRA procedure for the project	The Applicant will provide an updated HRA including the information from Table 8.12 of ES Chapter 8 Biodiversity **[APP-028]** regarding LSE at a future deadline.
NE-10	**Nationally Designated Sites** All relevant nationally designated sites	Potential air quality impacts from construction traffic on nationally designated sites.	The Applicant will provide the relevant air quality information at a future deadline.
NE-11	**Nationally Designated Sites** Humber Estuary SSSI	Potential impacts on the Humber Estuary SSSI	The Applicant will provide consideration of the Humber Estuary SPA/Ramsar site at a future deadline.
NE-12	**Nationally Designated Sites** Derwent Ings SSSI Melbourne & Thornton Ings SSSI Breighton Meadows SSSI	Potential impacts on the Derwent Ings, Melbourne & Thornton Ings and Breighton Meadows SSSI	The Applicant will provide consideration of the Derwent Ings, Melbourne & Thornton Ings and Breighton Meadows SSSIs at a future deadline.

Reference	Theme	Issue Raised	Applicant's Response
NE-13	**Nationally Designated Sites** Eskamhon Meadows SSSI	Potential impacts on the Eskamhorn Meadows SSSI	The Applicant will provide the relevant air quality information at a future deadline.
NE-14	**Nationally Designated Sites** Thorne, Crowle & Goole Moors SSSI Hatfield Moors SSSI	Potential impacts on breeding nightjar associated with Thorne, Crowle & Goole Moors SSSI and Hatfield Moors SSSI	As detailed above at NE-05, Natural England have no further comments **[RR-268].**
NE-15	**Nationally Designated Sites** River Derwent SSSI	Impacts on the interest features of River Derwent SSSI – Natural England identify that the River Derwent SSSI is also designated for mobile features including otter and fish and there are unlikely to be impacts on these sites and they will not raise this through examination.	The Applicant agrees with Natural England that there are unlikely to be impacts to the River Derwent SSSI and no further information is required **[RR-268].**
NE-16	**Protected Species**	Protected Species – General	The Applicant agrees to Natural England's comments regarding licences **[RR-268].**
NE-17	Biodiversity Net Gain (BNG)	BNG – General and advisory note on delivery	The Applicant has submitted a BNG assessment **[APP-153]** to demonstrate that a net gain can be achieved. The Applicant will not be providing any additional assessment as the statutory regime does not yet apply to NSIPs.
NE-18	Agricultural Land – outline Soil Management Plan	***Soils and best and most versatile agricultural land*** *Natural England welcome the inclusion of the outline Soil Management Plan (oSMP). We advise however that*	The points raised by Natural England regarding the outline Soil Management Plan are addressed in the Applicant's response to NE-19 to NE-24.

Reference	Theme	Issue Raised	Applicant's Response
		following our S42 response, the updated oSMP [APP-173] has not directly addressed previous advice. In particular we advise the following points should be addressed.	
NE-19	Agricultural Land – outline Soil Management Plan	***Comments on the oSMP - 'Amber' Risk*** *We recommend that the DEFRA best practice guidance (Defra Construction Code of Practice) should be followed and referred to throughout the final management plan.*	Defra's Construction Code of Practice is already referred to in the oSRMP **[APP-183]** and extracts from the Code of Practice are attached to the oSRMP at Appendix KCC4.
NE-20	Agricultural Land – outline Soil Management Plan	*Soil handling should generally be avoided October to March inclusive, irrespective of soil moisture conditions, because it will generally not be possible to establish green cover over winter to help dry out soils and protect them from erosion. Soils should only be handled in a dry and friable condition. A field suitable method for assessing whether soils are in a dry and friable condition based on plastic limits is set out in Part One (Explanatory Note 4 – Table 4.2 provided below in Annex 1) of the Institute of Quarrying's Good Practice Guide for Handling Soils in Mineral Working, and this approach together with the associated rainfall protocols should be adopted.*	Natural England require that the field suitability test from the Institute of Quarrying's Good Practice Guide be adopted. The Guide is already referred to already in the oSRMP **[APP-183]** at paragraph 4.15 and Table 4.2 is already appended at Appendix KCC2. The soils across the Site are generally sandy and a longer period when soils are suitable for being trafficked in the autumn is often possible. This is set out in the oSRMP **[APP-183]**, at 4.6 to 4.18, including using the services of a soil expert as necessary and using the Institute of Quarrying's soil suitability tests.
NE-21	Agricultural Land – outline Soil Management Plan	*Where compaction is likely to take place further consideration should be given to providing a decompaction strategy to maximise the effectiveness of decompaction methods. Further guidance may be found here;* *IQ Soil Guidance Sheet.*	This reference can be added to the final Soil Resource Management Plan. The IQ Guide is already referenced in the oSRMP **[APP-183]**, as noted above.
NE-22	Agricultural Land – outline Soil Management Plan	*There should also be a commitment for 'best and most versatile' (BMV) agricultural temporality required for the development to be returned back to its original ALC grade. This includes areas such as field scale ecological mitigation areas and borrow pits where reinstatement to the physical*	The Applicant commits to restoration to the same ALC grade as before construction starts. This includes the BESS areas where there is attenuation pond construction.

Reference	Theme	Issue Raised	Applicant's Response
		characteristics of 'best and most versatile' quality may also be required. We also note that recovery is less likely to occur rapidly during winter months.	The Applicant agrees with Natural England's comments about winter recovery being slower. The oSRMP at 7.10 and 12.1 already sets out that timing of works is important, specifying that a suitably qualified soil scientist shall be engaged *"prior to decommissioning to update the guidance and timing"*.
NE-23	Agricultural Land – outline Soil Management Plan	*We note that that the final surface of the infill is to be at such a level as to follow the final pre-settlement contours as specified in the submitted details. Natural England welcomes this commitment and recognise this satisfies any previous advice regarding the decommissioning process.*	No action required.
NE-24	Agricultural Land – outline Soil Management Plan	*We note that target soil profiles for the extension area are not given. A minimum settled soil depth of 120cm is required, typically 30cm topsoil over 90cm of subsoil. The available volumes and deployment of the differing soil types by phase within the extension area is not stated. The reinstated soil profile should be capable of achieving best and most versatile quality. We recommend that these points are addressed in the SMP.*	The Applicant is not clear what area is being referred to, but the principles of 30cm topsoil over 90cm subsoil (if that was the depth pre-construction) are noted and will be adhered to.
NE-25	Agricultural Land	*ALC of the cable route corridor* *We note that no additional assessment has been provided of impacts of the cable route corridor. As demonstrated in Figure 3.2 Parameter plan, a large area connects three areas of the solar PV zone together.*	The cable trench will be a relatively narrow excavation, with topsoil stripped over the working width prior to trenching. The working width may vary depending on details such as coring or restrictions such as hedgerow gaps. A detailed soil survey and ALC assessment will be carried out for the final Soil Resources Management Plan once the route of the trench has been determined more accurately, so that large areas of land are not assessed unnecessarily.

Reference	Theme	Issue Raised	Applicant's Response
			That approach will accord with the conclusions of the Examining Authority with regards to Cottam Solar Project, as confirmed by the Secretary of State, as set out in paragraph 4.72 of the decision letter, as described in the ExA's report summarised at 4.63 and 4.64 of the SoS decision letter.
NE-26	Agricultural Land – outline Soil Management Plan	*Paragraph 9.5 of the oSMP notes that 'If the topsoil was from grassland the grass will probably recover rapidly without the need to reseed. In bare soils the trench can be cultivated with the wider area for seeding to grass post installation'. However, we advise that the latter would need to be carried out at a specific time of year to enable successful reseeding to take place.*	Natural England's advice that seeding with grass seed needs to take place at certain times of the year to be successful is noted and agreed. Seeding is normally done in the spring or the autumn. This is a basic growing technique, and this can be clarified in the final SRMP if considered necessary.
NE-27	Agricultural Land – outline Soil Management Plan	*Please refer to section 4.2 of our S42 response for full comments on Soils and BMV Agricultural Land.*	The comments by Natural England on the oSRMP **[APP-183]** set out in 4.2.6 of their s42 response on 19th December 2023 have been largely replicated in the comments above and have been addressed. All comments are important, but all relate to small matters of clarification of detail. Natural England has not specifically referred to comments from the S42 response relating to the ALC document, but there were three to which the following comments refer: **4.2.1 comment: cable route should be surveyed.** This is responded to above. To avoid the need to survey large areas of land unnecessarily it is proposed that the cable route be surveyed post consent but pre-construction, as per the Cottam decision.

Reference	Theme	Issue Raised	Applicant's Response
			4.2.2 comments: a number of the trial pits were not shown on the plans. There are a number of trial pits carried out from the original ALC which, once the area was reduced, relate to pits nearby but no longer within the site. The pits are indicative of the wider soil areas, and it was considered that they still had a use in the ALC report, and so were retained in the report. We agree that they are not shown on the plans as those auger points are not on the plans as the site area was reduced. **4.2.2 Irrigation removed from PPG.** Natural England's concern is that the ALC might have upgraded the ALC grade of some areas by giving undue weight to the availability of irrigation. Whilst the guidance for the PPG7 was dropped, that guidance was also referring to other agricultural considerations. The ALC methodology from October 1988 remains unchanged. NE's comments are noted that the planning weight attached to the benefits of irrigation has reduced. However, the ALC methodology has not changed, and we consider that the ALC grading is correct and has not been overstated. Overall, all of the comments by Natural England in their S42 response are addressed above and there is not considered to be any necessity to amend the oSRMP **[APP-183]** or ALC. The comments are all helpful and of very specific details.
NE-28	Development Consent Order	***Schedule 2, Part 1, Requirement 8 - 'Amber' Risk*** *Natural England consider this an essential requirement. Comments have been provided above on what additional*	A detailed Soil Resource Management Plan is secured via Requirement 8 of the DCO **[APP-007]**. Please see

Reference	Theme	Issue Raised	Applicant's Response
		considerations should be included within the outline soil resource management plan.	responses NE-19 to NE-24 above regarding the additional considerations in the oSRMP **[APP-183]**.
NE-29	Development Consent Order	***Schedule 2, Part 1, Requirement 10 - 'Yellow' Risk*** *Natural England consider this an essential requirement. The DCO does not currently specifically secure biodiversity net gain proposals. This could be included within this requirement. We recommend a minimum of 10% biodiversity net gain is secured within the DCO wording.*	As set out in ES Chapter 8 Biodiversity **[APP-028]**, the Proposed Development includes significant habitat enhancement provisions; these will be managed for the benefit of wildlife over the long term and will provide biodiversity gains for a wide variety of species. Additionally, the proposed creation of diverse grasslands, tree planting and hedgerow planting will deliver a quantifiable biodiversity benefit . This will be implemented according to the detailed LEMP, which will be secured via Requirement 10 of the DCO. The Applicant has submitted a BNG assessment **[APP-153]** to demonstrate that a net gain can be achieved. The dDCO will not secure a minimum of 10% biodiversity net gain as this remains non-mandatory for NSIPs.
NE-30	Development Consent Order	*The DCO does not currently secure measures to prevent impacts to protected species. ('Amber' Risk)*	Measures to prevent impacts to protected species will be implemented through the CEMP, OEMP, DEMP and LEMP, which are secured via DCO requirements 4, 7, 5 and 10 respectively, as set out in the dDCO **[AS-007]**.

Table 2.17 – Network Rail Infrastructure [RR-272]

Reference	Theme	Issue Raised	Applicant's Response
NR-01	Network rail infrastructure	*Network Rail is a statutory undertaker and owns, operates and maintains the majority of the rail infrastructure of Great Britain. The Order sought by the Promoter includes development consent for the installation of ground mounted solar arrays, energy storage and associated development comprising grid connection infrastructure with a capacity greater than 50MW located to the south west of the village of Camblesforth and to the north of the village of Hirst Court. The Promoter seeks authority and powers in the draft Order for the following existing rights for the benefit of Network Rail to be extinguished in so far as they are inconsistent with the new rights proposed to be acquired by the Promoter:* *1. Right of entry relating to maintaining works and fences as contained in a Conveyance dated 27 June 1969 for the benefit of unknown land (plot 55);* *2. Right of entry relating to maintaining works and fences as contained in a Conveyance dated 27 June 1969 for the benefit of unknown land (plot 56);* *3. Right of entry relating to maintaining works and fences as contained in a Conveyance dated 27 June 1969 for the benefit of unknown land (plot 57);* *4. Restrictive covenant to not interfere with or damage electric lines and to not place or deposit anything and restrictive covenants relating to construction, earthworks, laying of concrete and planting of vegetation as contained in a Deed dated 4 February 2010 and varied in a Deed of Rectification dated 15 April 2010 (plot 59);*	The Applicant is in communication with Network Rail Infrastructure in respect of its Relevant Representation and has therefore not responded to their RR at this time. The Applicant anticipates that through discussions their concerns can be satisfactorily resolved. It should be noted that the Proposed Development does not affect any of Network Rail's rail infrastructure. The railway to be crossed by the Proposed Development is a private railway owned by Drax Power Limited.

Reference	Theme	Issue Raised	Applicant's Response
		5. Personal covenant to maintain culverts, level crossings, lineside fences and other works as contained in a Conveyance dated 23 June 1969 (plot 61); and *6. Right of entry relating to inspecting, maintaining and repairing works and fences as contained in a Conveyance dated 27 June 1969 (plot 61).*	
NR-02	Protective provisions	*Network Rail wishes to ensure that the Scheme will not have a detrimental impact on the operation of the Railway and that the safety of the Railway is maintained during the construction, operation and ongoing maintenance requirements of the Scheme. As the Promoter proposes to extinguish existing rights for the benefit of Network Rail, Network Rail wishes to object to the making of the Order on the ground that the rights proposed to be extinguish may compromise Network Rail's ability to maintain the safe and efficient operation of the Railway. In order for Network Rail to be in a position to withdraw its objection Network Rail will require adequate protective provisions and/or requirements to be included within the Order and an agreement with the Promoter to ensure that the existing rights are preserved. Network Rail is continuing to review the Promoter's plans, draft Order and application documents, and will continue to work constructively with the Promoter to clarify any issues raised. The Examining Authority and the Secretary of State will need to be satisfied that railway safety and operations will not be compromised by the making of the Order.*	The Applicant is in communication with Network Rail Infrastructure in respect of its Relevant Representation and has therefore not responded to their RR at this time. The Applicant anticipates that through discussions their concerns can be satisfactorily resolved.

Table 2.18 – Northern Powergrid (Yorkshire) LLP [RR-280]

Reference	Theme	Issue Raised	Applicant's Response
NP-01		*There is a significant amount of Northern Powergrid infrastructure within the red line boundary area of the Order including a primary substation (Drax 382 primary substation) and thus the project has a direct impact on Northern Powergrid's existing critical national infrastructure which serves significant numbers of customers in the local and wider area. Northen Powergrid's rights for these assets are essential in maintaining an uninterrupted power supply to the customers they serve. Northern Powergrid has a statutory duty to provide its customers with an uninterrupted supply of electricity and thus rightly raises concerns to any scheme that would result in a breach to its duty.*	The Applicant is communicating with Northern Powergrid (Yorkshire) LLP in respect of its Relevant Representation and the need for Protective Provisions in respect of their assets. Therefore, the Applicant has not responded in detail to the points raised in their RR at this time.
NP-02	Protective provisions	*The proposed development seeks to interfere with Northern Powergrid's existing apparatus; there are many points at which the required infrastructure in the Order Land crosses NPG's overhead lines and underground cables both of which are vital for Northern Powergrid's existing operations. Northern Powergrid therefore reserves the right to review the position as the scheme progresses and protect its existing apparatus including with bespoke protective provisions in the Order, as at this stage, the specific details of the DCO infrastructure including the depth, diameter and respective easement strips are unknown. NPG's existing apparatus may need to be diverted to accommodate the DCO project and therefore NPG requires bespoke protective provisions to protect its position and recover the costs of any required diversions or relocations.*	The Applicant is communicating with Northern Powergrid (Yorkshire) LLP in respect of its Relevant Representation and the need for Protective Provisions in respect of their assets. Therefore, the Applicant has not responded in detail to the points raised in their RR at this time.
NP-03	Protective provisions	*Northern Powergrid also has concerns over the currently proposed protective provisions contained within the draft Order as they do not take into account site specific issues and do not accord with Northern Powergrid's standard protective provision requirements. The compulsory purchase powers incorporated into the DCO seeks*	The Applicant is communicating with Northern Powergrid (Yorkshire) LLP in respect of its Relevant Representation and the need for Protective Provisions in respect of their assets. Therefore, the Applicant has

Reference	Theme	Issue Raised	Applicant's Response
		to acquire land and interests which, if acquired, would adversely affect Northern Powergrid's ability to use, access, maintain and where necessary upgrade its equipment. It is not necessary to acquire these interests where an agreement between the parties would be more appropriate. Northern Powergrid is keen to discuss its concerns with Enso Green Holdings D ('the Applicant') to reduce the project's impacts on Northern Powergrid's apparatus and agree bespoke protective provisions within the draft Order. To date, however, there has been little engagement with the Applicant and therefore until further details are received to allow Northern Powergrid to assess and reduce the impact of the scheme on Northern Powergrid equipment and agree bespoke protective provisions to protect Northern Powergrid's costs position, Northern Powergrid objects to this scheme.	not responded in detail to the points raised in their RR at this time.

Table 2.19 – Ofgem [RR-281]

Reference	Theme	Issue Raised	Applicant's Response
OFG-01	Cybersecurity	*The concern that the project will pose a risk to the security of UK energy supply if the design, construction and operation of the project does not address the requirement for cybersecurity through the adoption of appropriate and proportionate (cyber) risk management practise. The asset may well become designated at a specified CNI rating or the owner / operator be considered an Operator of Essential Services (OES) and this needs to be considered within the planning process. This may require consideration of design aspects to add redundancy or impact the selection of location for example.*	Given the multiple sources and diversity of generation in the UK, and the limited generation capacity of the Helios Renewable Energy Project, the project would not meet the National Protective Security Authority or the UK Governments definition of Critical National Infrastructure (CNI)[1] or Operator of Essential Services (OES), and so would not be designated as such by the Department for Energy and Net Zero (DESNZ). The Helios Renewable Energy Project will connect electrically to the National Grid Transmission Network pursuant to an agreement with the National Energy System Operator (NESO) which (as is standard practice) contains obligations to comply with the required standards and connection conditions set out in the Grid Code, Standard & Quality of Supply Standards (SQSS) and the Connection and Use of System code (CUSC). As such, the project will meet the cyber security standards required of electricity storage and a generating station connecting to the National Electricity Transmission network. Compliance with these standards and codes means that the project will meet the strict cyber security protocols and firewalls that ensure that NESO's, National Grid's and Elexon's systems, which are designated as CNI, remain secure. *[1] The UK government's official definition of CNI is:* *'Those critical elements of infrastructure (namely assets, facilities, systems, networks or processes and*

			the essential workers that operate and facilitate them), the loss or compromise of which could result in: *a) Major detrimental impact on the availability, integrity or delivery of essential services - including those services whose integrity, if compromised, could result in significant loss of life or casualties - taking into account significant economic or social impacts; and/or* *b) Significant impact on national security, national defence, or the functioning of the state.'*

Table 2.20 – The Land Management Partnership [RR-337]

Reference	Theme	Issue Raised	Applicant's Response
LMP-01	Land access	*I am making this representation on behalf of my client, Lord Gerald Fitzalan Howard. My client owns a large majority of the land around Rose Hill farm and as such we want to make a number of representations:* *1. Why were we not asked to be part of the project when it first commenced?* *2. We are concerned about access rights across our neighbours land that my client has the benefit of. Will there be alternative access provisions made?* *3. Given my clients land and property are right on the boundary of this solar park, how will he be compensated for the diminution in value of his property if and when the solar project goes ahead? Thank you for taking the time to review these comments and i look forward hearing from you in due course.*	1. The Applicant's records show Lord Gerald Fitzalan Howard was contacted in July 2020. 2. The Applicant is engaging with The Property Partnership Group with respect to access rights. From the information provided to date, the Applicant does not believe there is any need for alternative access provisions to be made. Land Interest Questionnaire's were sent to Lord Gerald Fitzalan Howard on 07/10/2023 and no response was received. 3. Diminution in value of properties is not considered a risk if the project was to proceed.

Table 2.21 – The Woodland Trust [RR-338]

Reference	Theme	Issue Raised	Applicant's Response
TWT-01	Arboriculture	*We are pleased to note that Kerrick Spring Wood ancient woodland has been afforded a 15 metre buffer zone. However, we have some concerns in relation to potential impacts of the development on ancient and veteran trees. The applicant has provided an Arboricultural Impact Assessment (APP-150), which includes a tree survey detailing trees within proximity of the proposed works. It is stated that no ancient or veteran trees have been recorded on the site, however, the tree survey describes trees T225 and T278 as "borderline ancient". A tree which is considered to be borderline ancient should be categorised as a veteran tree and afforded a veteran tree buffer in line with Natural England and Forestry Commission's standing advice.*	TWT-01 comment on Kerrick Spring Wood is noted. English oak trees identified as T255 (not T225 as stated by TWT-01) and T278 are both borderline Veteran trees and not borderline Ancient. This is incorrect terminology used in the field notes that form the basis of the tree survey schedules. This matter will be rectified in an updated revision of the AIA. Both T255 and T278 will be retained and their Root protection Areas fully protected throughout the construction process **[APP-150]**.
TWT-02	Arboriculture	*We have not been able to find a plan showing the position of infrastructure in relation to root protection areas, but it should be ensured that new infrastructure is excluded from these buffer zones.*	The detailed tree survey (to the standards set out in BS5837:2012) has been undertaken to inform the design of the proposed development. The constraints posed by trees across the site have been respected within the Parameter Plan included within the Arboricultural Impact Assessment **[APP-150]**. This matter will be considered further at the detailed design stage. The specific details of works around individual trees will be the subject of LPA consent through the Detailed Design Approval process as part of Requirement 3 of the dDCO **[APP-007]**.
TWT-03	Arboriculture	*Additionally, we note the presence of two trees adjacent to the site boundary which are registered on the Ancient Tree Inventory (ATI). These are:- ATI ID 14482 (Veteran Oak) at grid ref SE 6311 2572 ATI ID 14481 (Veteran Oak) at grid ref SE 6320 2569 We have not been able to identify ID 14481 in the Tree Survey, however*	The tree identified by TWT-03 as '*ATI ID 14482 (Veteran Oak)*' is T190 of the tree survey and as part of the detailed arboricultural survey undertaken it was not classified as being of veteran status. None the less it is a large mature English oak tree that has been assigned

Reference	Theme	Issue Raised	Applicant's Response
		assuming that there are no modifications to Sandwith Lane it does not appear that the proposals would impact this veteran oak. ATI tree ID 14482 should be afforded a veteran tree buffer zone and care should be taken if any landscaping works south of Sandwith Lane are being undertaken within the buffer zone.	to Category A. The tree is located outside of the Order Limits and to the north of Sandwith Lane. The tree will be retained and no changes to Sandwith Lane that will impact on this tree are proposed. The same is true of the tree identified by TWT-03 as '*ATI ID 14481 (Veteran Oak)*' **[APP-150]**.
TWT-04	Arboriculture	*The tree survey identifies some notable specimens. We would advise that where notable trees are identified they should be retained and afforded sufficient buffers to allow them to become veteran trees in the future. Although notable trees may not represent the same level of value as ancient or veteran trees, they are likely to become veteran specimens if afforded appropriate space to grow and develop.*	The tree survey identifies only 2No notable trees **[APP-150]**. These are English oaks T341 and T455. Both of these trees will be retained and their Root protection Areas fully protected throughout the construction process. The TWT-04 comment on allowing appropriate space to grow and develop is noted. This matter will be considered at the detailed design stage. The specific details of works around individual trees will be the subject of LPA consent through the Detailed Design Approval process as part of Requirement 3 of the dDCO **[APP-007]**.

Table 2.22 – UK Health Security Agency [RR-345]

Reference	Theme	Issue Raised	Applicant's Response
HSA-01	Public Health	*Thank you for your consultation regarding the above development. The UK Health Security Agency (UKHSA) welcomes the opportunity to comment on your proposals at this stage of the project. Please note that we request views from the Office for Health Improvement and Disparities (OHID) and the response provided is sent on behalf of both UKHSA and OHID. We can confirm that: With respect to Registration of Interest documentation, we are reassured that earlier comments raised by us on 29th November 2023 have been addressed. UKHSA/OHID is satisfied with the methodology used to undertake the environmental assessment. Following our review of the submitted documentation we are satisfied that the proposed development should not result in any significant adverse impact on public health. On that basis, we have no additional comments to make at this stage and can confirm that we have chosen NOT to register an interest with the Planning Inspectorate on this occasion.*	The Applicant welcomes the UK Health Security Agency (UKHSA) response and confirmation they are satisfied with the methodology and assessment of effects. No further action will be taken.

3. The Applicant's thematic responses to Members of the Public and all remaining Organisations and Businesses

3.1. Overview

3.1.1. This section sets out the Applicant's responses to common themes raised in RRs received from members of the public and all remaining organisations and businesses.

3.1.2. For each common theme, the sections below provide a summary of the theme raised and the comments received, and then the Applicant's position on the matter.

3.1.3. The following common themes are considered and addressed in this section:

- Agricultural Land
- Air Quality
- Alternatives
- Biodiversity
- Climate Change
- Consultation
- Cultural Heritage
- Cumulative Impact
- Design
- Glint and Glare
- Ground Conditions
- Landscape and Views
- Noise
- Planning Policy
- Principle of the Proposed Development
- Safety
- Socio-economics
- Transport and Access
- Water Environment
- Other Matters

3.2. Agricultural Land

Table 3.1 – Agricultural Land

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
Use of Agricultural Land and Impact on Food Security	RR-001, RR-003, RR-004, RR-005, RR-007, RR-012, RR-014, RR-015, RR-017, RR-020, RR-021, RR-022, RR-025, RR-027, RR-028, RR-029, RR-030, RR-032, RR-033, RR-034, RR-035, RR-036, RR-037, RR-038, RR-041, RR-044, RR-046, RR-047, RR-049, RR-050, RR-051, RR-052, RR-055, RR-056, RR-057, RR-058, RR-059, RR-060, RR-061, RR-067, RR-068, RR-069, RR-070, RR-073, RR-074, RR-076, RR-077, RR-078, RR-079, RR-080, RR-081, RR-082, RR-085, RR-086, RR-087, RR-089, RR-090, RR-091, RR-092, RR-093, RR-094, RR-095, RR-	*Objection to the loss of agricultural land, citing concerns including impact on food security and the high quality of the agricultural land. It has been commented that the use of BMV land for the Proposed Development is against the guidelines set out in the NPPF.* *The importance of energy security / self-sufficiency was acknowledged, but concern was expressed that this should be balanced with food security / self-sufficiency. It has been commented that clean energy should not come at the expense of top-quality agricultural land.* *Concern expressed that the removal of this land out of agricultural use would reduce farming capacity and harm the local economy and farming community.*	Table 4.1 within the Planning Statement **[APP-228]** sets out the Government's view that large capacities of low-carbon generation will be required to meet increased demand and to support the phasing out of fossil fuel-based methods of energy production. In reference to paragraph 2.3.6 of NPS EN-1, it states, in the context of meeting our Net Zero target, we need to "We need to transform the energy system, tackling emissions while continuing to ensure secure and reliable supply, and affordable bills for households and businesses. This includes increasing our supply of clean energy from renewables, nuclear and hydrogen manufactured using low carbon processes". The NPPF does not explicitly rule out development on agricultural land, it instead states that "Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality." This is supported within NPS EN-3, paragraph 2.10.30 which states "Whilst the development of ground mounted solar arrays is not prohibited on Best and Most Versatile agricultural land…the impacts of such are expected to be considered and are discussed under 2.10.73 - 92 and 2.10.107 - 2.10.126 which identifies a non-exhaustive list of specific impacts". As detailed in Planning Statement Appendix 2: Alternative Site Assessment **[APP-227]**, paragraph 2.6.29, a search was

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
	098, RR-099, RR-100, RR-101, RR-102, RR-103, RR-104, RR-107, RR-108, RR-109, RR-111, RR-112, RR-116, RR-118, RR-119, RR-121, RR-122, RR-125, RR-126, RR-127, RR-130, RR-131, RR-132, RR-133, RR-134, RR-135, RR-136, RR-137, RR-138, RR-140, RR-141, RR-142, RR-144, RR-145, RR-146, RR-147, RR-149, RR-150, RR-152, RR-153, RR-154, RR-155, RR-156, RR-157, RR-158, RR-160, RR-161, RR-162, RR-163, RR-164, RR-167, RR-169, RR-170, RR-171, RR-172, RR-174, RR-177, RR-178, RR-179, RR-182, RR-184, RR-186, RR-187, RR-188, RR-189, RR-190, RR-191, RR-193, RR-196, RR-199, RR-201, RR-202, RR-203, RR-204, RR-205, RR-		conducted for suitable non-agricultural brownfield land within a 5km distance from the point of connection at Drax Power Station. Paragraph 2.6.21 to 2.6.25 of the Alternative Site Assessment (ASA) [APP-227] set out the justification for the use of provisional Grade 2 agricultural land. As shown in Figure 2.7 of the ASA, the majority of the land within a 5km radius of the point of connection is either Grade 1 or Grade 2. The Grade 3 land within the 5km radius is not available for development due to existing uses and planning applications in these areas. Environmental Statement Chapter 14 - Soils and Agricultural Land **[APP-034]** discusses the impact on food security and impact to the local farming economy. Paragraph 14.5.85 states that a Government Statement (Food supply and Food Security, Defra) at the end of 2022 confirmed that there are no food security concerns at the present time. This can be illustrated by reference to the UK Food Security Report 2021 (latest update December 2022), which set out the following: 'However, from a purely calorific perspective, the (below average) grain yield in 2020 of 19 million tonnes would be sufficient to sustain the population. It is equivalent to 283kg per person, 0.8 kilos per day. A kilo of wheat provides 3,400 calories (and barley slightly more at 3520 calories), making 0.8 kilos of grain over 2,600 calories, compared to recommended calorie intake of 2 to 2,500 for adults. From these figures it is easy to demonstrate that, even without accounting for other domestic products like potatoes, vegetables, grass-fed meat and dairy, and fisheries, current UK grain production alone could meet domestic calorie

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
	206, RR-207, RR-209, RR-210, RR-211, RR-212, RR-215, RR-216, RR-217, RR-218, RR-219, RR-220, RR-221, RR-222, RR-224, RR-226, RR-227, RR-228, RR-229, RR-231, RR-232, RR-233, RR-239, RR-240, RR-241, RR-243, RR-246, RR-247, RR-248, RR-249, RR-250, RR-251, RR-252, RR-253, RR-254, RR-255, RR-256, RR-257, RR-258, RR-259, RR-261, RR-263, RR-265, RR-270, RR-271, RR-274, RR-275, RR-276, RR-282, RR-283, RR-284, RR-285, RR-286, RR-288, RR-289, RR-290, RR-291, RR-292, RR-293, RR-294, RR-296, RR-297, RR-298, RR-299, RR-300, RR-304, RR-305, RR-306, RR-307, RR-308, RR-309, RR-312, RR-313, RR-316, RR-318, RR-		requirements if it was consumed directly by humans in a limited choice scenario.' Paragraph 14.5.87 reinforces that there is no concern from Government about food security and no requirements or incentives to manage land for food production. The land use change from agriculture (only some of which is for food) to a mix of energy production and agriculture will not result in any significant adverse environmental or economic effects. The impacts on local farm businesses have been assessed in the same chapter **[APP-034]**, paragraph 14.5.58 states that none of the five farm businesses will be significantly affected by the operational phase of the Proposed Development. Four of the affected farms are full-time farm businesses, and accordingly of medium sensitivity, none will be affected to the extent that a continued viable farm business cannot continue, notwithstanding the economic benefit of rental income from the panels. Further detail relating to farm business is found within Environmental Statement Appendix 14.2 - Farm Business Reports **[APP-172]** and further information regarding food security can be found in Environmental Statement Appendix 14.4 - Analysis of UK Food Security **[APP-174]**.

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
	319, RR-320, RR-322, RR-323, RR-324, RR-326, RR-327, RR-329, RR-330, RR-332, RR-333, RR-335, RR-336, RR-340, RR-342, RR-346, RR-347, AS-004		
Sheep Grazing	RR-247	*Concern raised over whether the use of the land around the solar panels for sheep grazing would be feasible.*	Environmental Statement Chapter 14 - Soils and Agricultural Land **[APP-034]** outlines that sheep and their management will remain under the control of the farmers to whom they belong. As explored from paragraph 14.5.52, the land will be sown to grassland and managed, potentially including by being grazed by sheep, for the duration of the operational phase, which is expected to have a positive benefit for the soils. There is a preference for sheep grazing for the maintenance of grasslands, as set out in Section 4.3.4 of the oLEMP **[APP-143]**.
Impact to Soil	RR-191	*Concern raised that the Proposed Development would cause long-term damage to the soil and to the land. Concern expressed that there would be a negative impact on plant growth due to the materials used in solar panels.*	Environmental Statement Chapter 14 - Soils and Agricultural Land **[APP-034]** concludes that the operational phase would result in potential benefits to soil health and quality. As explored from paragraph 14.5.52, the land will be sown to grassland and managed, including by being grazed by sheep for the duration of the operational phase, which is expected to have a positive benefit for the soils.
Land Use after Decommissioning	RR-002, RR-076, RR-110, RR-191, RR-193, RR-234, RR-237, RR-341	*Concerns have been raised over whether the land will return to farming use after decommissioning. It has been raised that the Proposed Development would cause long-term damage to the*	As stated above Environmental Statement Chapter 14 - Soils and Agricultural Land **[APP-034]** concludes that the operational phase would result in potential benefits to soil health and quality. As discussed from paragraph 14.5.52, the land will be sown to grassland and managed, including by being grazed by sheep for

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
		land which would make farming not feasible following the Proposed Development. It has been queried whether there were meaningful plans or commitment from the Applicant to return the Site to agricultural use following decommissioning.	the duration of the operational phase, which is expected to have a positive benefit for the soils. The decommissioning phase will not have any significant effects on agricultural land or soils, nor on farm businesses. Measures to mitigate potential effects to land and soil quality will be secured through the Outline Soil Management Plan **[APP-173]** and will introduce measures that mitigate potential effects to land and soil quality during the decommissioning phase, this will be secured through DCO requirement. It is anticipated that the soils across the Solar Farm Zone will be loosened with normal agricultural machinery and returned to the farmers in a condition which will be suitable for continued agricultural use.

3.3. Air Quality

Table 3.2 – Air Quality

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
Construction Impact	RR-019, RR-027, RR-050, RR-069, RR-115, RR-160, RR-253, RR-276, RR-341, RR-351	*Concerns have been raised that the Proposed Development would increase air pollution, with particular concern regarding the potential health impacts on the elderly and children.*	As discussed in The Planning Inspectorate's Scoping Opinion **[APP-112]**, it was agreed that it was appropriate to scope out a quantitative assessment of air quality effects as dust generation associated with the construction and decommissioning phases will be managed through the implementation of standard best practice and mitigation measures incorporated into the Construction Environmental Management Plan / Decommissioning Environmental Management Plan (CEMP/DEMP). The Inspectorate agrees that once operational, the Proposed Development is unlikely to result in significant air quality effects as the components of the Proposed Development do not produce dust emissions. A Construction Dust Risk Assessment **[APP-113]** has been carried out as part of the application. This assessment evaluated the risk of dust impacts and identified site-specific mitigation measures to effectively address any potential significant effects. As outlined in paragraph 5.4 of that assessment, it was concluded that the recommended mitigation measures would reduce residual effects to a level deemed 'not significant.' These measures include implementing a Dust Management Plan, to be approved by the Local Authority at the appropriate development phase and employing site management techniques such as tracking dust and air quality complaints to promptly address issues. Additionally, operational restrictions will be put in place to
Construction Dust Mitigation	RR-201	*Concerns have been raised regarding the mitigation measures to control construction dust. It has been suggested that dust from earthworks poses hazards to air quality. Concern has been raised over the health impacts of dust particles, especially on vulnerable groups such as the elderly.*	

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
			limit and control dust production. A comprehensive list of recommendations is provided in the Construction Dust Risk Assessment at Table 11.

3.4. Alternatives

Table 3.3 – Alternatives

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
Alternative site (e.g. brownfield, rooftop solar)	RR-002, RR-003, RR-011, RR-012, RR-014, RR-015, RR-017, RR-025, RR-029, RR-032, RR-035, RR-036, RR-038, RR-042, RR-046, RR-049, RR-052, RR-055, RR-060, RR-061, RR-062, RR-063, RR-067, RR-068, RR-069, RR-073, RR-076, RR-078, RR-079, RR-080, RR-086, RR-092, RR-095, RR-101, RR-103, RR-107, RR-108, RR-110, RR-111, RR-116, RR-118, RR-121, RR-122, RR-125, RR-126, RR-128, RR-131, RR-132, RR-137, RR-138, RR-140, RR-141, RR-145, RR-146, RR-149, RR-150, RR-152, RR-157, RR-158, RR-161, RR-168, RR-170, RR-171, RR-174, RR-178, RR-181, RR-184, RR-187, RR-189, RR-191, RR-193, RR-195, RR-198, RR-199, RR-201, RR-202, RR-203, RR-204, RR-209, RR-211, RR-215,	*It has been suggested that alternative sites, such as brownfield locations or rooftop solar installations, should be used for the Proposed Development rather than agricultural land, to preserve prime farmland. The Proposed Development is criticised for overlooking alternative sites like industrial zones, brownfield land, and unused rooftops on warehouses and houses. It has been suggested that using solar panels on productive land is a cheap but inappropriate choice, advocating for alternative brownfield sites like the former Eggborough power station, Drax Power Station Ash Tip, and old pit slag heaps. It has been suggested that existing electrical infrastructure at these alternative sites and question why energy projects aren't redirected to less useful areas instead of prime arable land. Nearby sites like Ferrybridge and*	Table 4.1 within the Planning Statement **[APP-228]** describes the Government's view that large capacities of low-carbon generation will be required to meet increased demand and to support the phasing out of fossil fuel-based methods of energy production. In reference to paragraph 2.3.6, it states, in the context of meeting our Net Zero target, we need to "We need to transform the energy system, tackling emissions while continuing to ensure secure and reliable supply, and affordable bills for households and businesses. This includes increasing our supply of clean energy from renewables, nuclear and hydrogen manufactured using low carbon processes" The Applicant accepts the need to increase the deployment of rooftop solar and utility scale solar as part of a greater energy mix to work towards the Governments Net Zero targets. As set out in the Planning Statement Appendix 2: Alternative Site Assessment **[APP-227]**, a solar farm requires a reasonable proximity to an available connection to the national electricity system (NETS) or grid. The Point of Connection (POC) must have sufficient capacity for electricity generated by a proposed scheme. A more detailed site selection process can be undertaken once the POC has been identified, in this instance, the National Grid Drax 132kV Substation was identified by National Grid as having suitable capacity and the Applicant signed a Bilateral Connection Agreement to secure a 190MW connection in December 2020. As set out in paragraph 2.5.2 of the Alternative Site Assessment, there is no Government guidance on what a reasonable search area is in relation to site selection around an identified POC, a number of

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
	RR-219, RR-221, RR-223, RR-226, RR-229, RR-231, RR-232, RR-237, RR-241, RR-242, RR-245, RR-247, RR-250, RR-252, RR-253, RR-254, RR-256, RR-257, RR-258, RR-260, RR-261, RR-265, RR-270, RR-276, RR-284, RR-285, RR-290, RR-291, RR-296, RR-300, RR-305, RR-313, RR-314, RR-315, RR-317, RR-320, RR-323, RR-325, RR-327, RR-331, RR-350, RR-351	*Eggborough are also mentioned as overlooked alternatives.*	considerations relevant to the necessary cable route length and connection to the PoC, resulted in a 5km search radius (search area) being studied. These included the potential for greater environmental and community disturbance associated with a longer cable route, a longer cable route would lead to increased electrical transmission loss and a longer cable route would have a significant impact on the financial viability of the project. The opportunity to locate the Proposed Development on brownfield land has been explored, paragraph 4.5.10 of Chapter 4: Alternatives and Design Evolution of the Environmental Statement **[APP-024]** states that a review of brownfield land within the search radius was undertaken, however no brownfield sites of an appropriate size were identified in the 5km radius and the closest brownfield site to the PoC lies within the village of Camblesforth which did not provide sufficient area (1.26ha). This is also addressed in the Alternative Site Assessment, where paragraph 2.6.30 discusses that further brownfield land had been identified beyond that identified within the Environmental Statement, this brownfield land however has alternative uses, a large area is under Drax ownership and it being required for operations. The updated NPS (EN-1 Section 4.2) designates the development of low-carbon infrastructure, including large solar farms, as a "critical national priority". This means that utility-scale solar projects are given high importance in national planning decisions, reflecting the UK's urgent need to decarbonise its energy system by 2050. The NPS strongly supports utility-scale solar as part of the strategy to meet net zero targets.

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
Alternative source of energy generation	RR-005, RR-022, RR-028, RR-031, RR-047, RR-070, RR-077, RR-081, RR-112, RR-114, RR-142, RR-162, RR-163, RR-173, RR-186, RR-202, RR-247, RR-251, RR-289, RR-296, RR-299, RR-308, RR-312, RR-322	*It has been suggested that alternative sources of energy generation, such as wind, coal or nuclear, should be used instead of solar panels. There are suggestions for better locations and more efficient energy production methods, with wind turbines mentioned as a superior option for electricity production.*	Table 4.1 within the Planning Statement **[APP-228]** describes the Government's view that large capacities of low-carbon generation will be required to meet increased demand and to support the phasing out of fossil fuel-based methods of energy production. In reference to paragraph 2.3.6 of NPS EN-1, it states, in the context of meeting our Net Zero target, we need to "We need to transform the energy system, tackling emissions while continuing to ensure secure and reliable supply, and affordable bills for households and businesses. This includes increasing our supply of clean energy from renewables, nuclear and hydrogen manufactured using low carbon processes" The Proposed Development aligns with the objective of reducing carbon emissions while delivering secure and affordable energy to consumers. Given its size and capacity, the Proposed Development has significant potential to diversify the UK's energy generation and reduce reliance on fossil fuels, consistent with the government's strategy and recommendations from the National Grid. The benefits of the Proposed Development are detailed in section 6of the Planning Statement **[APP-228]**. These benefits include, but are not limited to, providing a reliable energy output, increasing renewable energy generation as per the critical national priority for the provision of nationally significant low carbon infrastructure, contributing positively to the Gross Value Added (GVA) in North Yorkshire, generating indirect employment opportunities, opportunities for farm diversification, and offering significant habitat enhancement measures that deliver a quantifiable biodiversity benefit. The Applicant believes that these benefits will outweigh any potential adverse impacts..
Location	RR-008, RR-008, RR-023, RR-063, RR-074, RR-085,	*It has been suggested that the proposed location is inappropriate for the Proposed Development and that a site further from residential*	As set out in section 4.5 of Chapter 4: Alternatives and Design Evolution of the Environmental Statement **[APP-024]**, a viable solar PV generation scheme must be located near to existing grid infrastructure, so it is able to export renewable electricity it has generated. On a more

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
	RR-089, RR-214, RR-223, RR-282, RR-310, RR-319	*receptors should be chosen. Whilst there is support for solar energy generation, there are objections to the Proposed Development in this location from the same individuals. Suggestions were made for relocating the Proposed Development to a sunnier region in the south or placing solar farms away from residential areas.*	regional scale, paragraph 4.5.6 states that land within North Yorkshire, and the more localised site selection area surrounding the grid connection, is considered as having potential to locate a large scale solar development due to the large open area of undeveloped land, characterised by gently undulating topography, which would provide uniform exposure to irradiance, and generally sparse settlement patterns. Paragraphs 2.10.18 - 2.10.27 of NPS EN-3 states that irradiance will be a key consideration for an applicant in identifying a potential site as the amount of electricity generated on site is directly affected by irradiance levels.
Scale	RR-109, RR-144, RR-165, RR-295, RR-297	*It has been suggested that Proposed Development is too large and should be split between smaller sites in different locations. The scale of the Proposed Development is seen as alarming, indicating a need for reconsideration.*	Large areas of land are ideal for large scale solar development, as contiguous sites reduce the need for excessive cabling. Further, open fields without vegetated boundaries mean less vegetation will be removed during construction. A land assembly of larger, fewer fields also means the buffering around field edges for tree root protection and the avoidance of shading can be reduced. Therefore, sites with larger open fields of a regular shape which were within the search area were preferred.

3.5. Biodiversity

Table 3.4 – Biodiversity

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
Impacts on local wildlife and habitat	RR-001, RR-002, RR-003, RR-004, RR-007, RR-008, RR-012, RR-013, RR-014, RR-017, RR-020, RR-025, RR-026, RR-027, RR-028, RR-038, RR-040, RR-041, RR-044, RR-049, RR-051, RR-052, RR-054, RR-055, RR-060, RR-061, RR-065, RR-067, RR-068, RR-069, RR-073, RR-075, RR-076, RR-077, RR-078, RR-082, RR-083, RR-084, RR-085, RR-086, RR-090, RR-093, RR-100, RR-101, RR-102, RR-103, RR-105, RR-107, RR-108, RR-110, RR-112, RR-113, RR-118, RR-119, RR-121, RR-125, RR-126, RR-127, RR-128, RR-130, RR-131, RR-132, RR-136, RR-137, RR-138,	*Concerns have been expressed regarding the impact of the Proposed Development on protected species and local wildlife, citing a lack of information in the application. There are worries that the Proposed Development will harm wildlife, including red-listed birds, bats, badgers, moles, wild deer, and buzzards, despite claims of biodiversity benefits. It is suggested that the impact on the ecosystem could be greater than acknowledged, potentially preventing the movement of wild animals and destroying the environment around the village. There are specific concerns about the removal of established plants affecting habitats of local bats, owls, and birds, and the potential for irreversible ecological damage to local flora and fauna, including bluebells, snowdrops, and hedgerows. Concerns have been expressed that security fencing will cut off wildlife routes, affecting species such as deer, hares, buzzards, skylarks, bats, barn owls, little owls, foxes, and peregrine falcons. Concerns have been*	Chapter 8: Biodiversity of the Environmental Statement **[APP-028]** sets out the extensive findings of all ecological investigations undertaken in accordance with the scoping opinion within the Order Limits together with an appraisal of the relative importance of each species group, habitat or designated site. The baseline data gathering involved a combination of desktop study and habitat surveys. The desktop study included a 5km search radius for statutory designated sites using resources like Natural England's Designated Sites View, JNCC, and MAGIC, extended to 10km for international sites. The study also examined European Protected Species (EPS) licences, great crested newt (GCN) data, and eDNA pond surveys within 2km. Biological records from NEYEDC and North Yorkshire Bat Group were analysed within a 2km radius, focusing on records from 2005 onwards (until the completion of the ES). Additional reviews of Ordnance Survey maps and aerial images were conducted to identify features of ecological interest. Results were documented in Figures 8.1 and 8.2 of the Environmental Statement. Paragraph 8.3.30 states an initial walkover survey was undertaken between 1st and 3rd March 2022. Following this, an extended habitat survey of the Site was undertaken between 3rd and 5th May 2022, between 30th and 31st May 2022 and on 14th July 2022. A further extended habitat survey of an updated area of proposed underground cable corridor located within and

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
	RR-139, RR-140, RR-141, RR-142, RR-145, RR-146, RR-148, RR-149, RR-150, RR-152, RR-154, RR-155, RR-156, RR-160, RR-161, RR-162, RR-163, RR-164, RR-167, RR-170, RR-175, RR-176, RR-178, RR-179, RR-180, RR-181, RR-182, RR-184, RR-187, RR-190, RR-191, RR-192, RR-193, RR-195, RR-196, RR-199, RR-201, RR-202, RR-205, RR-207, RR-209, RR-210, RR-211, RR-212, RR-214, RR-215, RR-219, RR-222, RR-225, RR-226, RR-227, RR-228, RR-229, RR-233, RR-236, RR-237, RR-243, RR-244, RR-245, RR-246, RR-247, RR-248, RR-249, RR-252, RR-253, RR-255, RR-256, RR-257, RR-258, RR-259, RR-260, RR-261, RR-262, RR-263, RR-264,	*raised that the proposed hedgerows will take years to establish, and glare from solar panels could impact birds. Additional worries include the impact of toxic metal components in solar panels on land ecology, large fences on local deer populations, soil erosion on microbial diversity, and noise and construction activities on horses and other animals. There is a call for a proper survey on the impact on skylarks and other wildlife.*	surrounding the Drax Golf Club Course was undertaken on 18th January 2023. All surveys were completed by suitably qualified and experienced ecologists. Baseline species-specific surveys and assessments were conducted between April 2021 and October 2023, including breeding and non-breeding bird surveys, badger surveys, water vole and otter surveys, as well as a great crested newt eDNA survey. Additional surveys have also been carried out following consultation with statutory consultees (set out in Table 8.5 of Chapter 8), additional ecological surveys were undertaken during the Spring and Summer of 2023. The primary aim of these surveys was to add context and enable future monitoring as agreed with NYC. These additional surveys consisted of a Bat activity survey (seasonal) and an Invertebrate walkover survey. These surveys have been used to inform the iterative design of the Proposed Development and avoidance of ecological features of value, such as hedgerows, woodland and ditches, has been a core design principal. Habitat retention, creation and species enhancement measures have been incorporated to benefit biodiversity and key species and will significantly enhance opportunities for wildlife within the Site and the wider environment. The Site is not located within, or linked to, any statutory designated site for nature conservation. It is acknowledged that the Site is located within impact risk zones for several Sites of Special Scientific Interest (all of which are located over 2km from the Site), however the assessment identifies that the Proposed Development would not impact these statutory designated sites due to their distance and

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
	RR-270, RR-271, RR-274, RR-275, RR-276, RR-283, RR-284, RR-285, RR-287, RR-288, RR-292, RR-297, RR-298, RR-299, RR-300, RR-301, RR-302, RR-306, RR-307, RR-310, RR-311, RR-312, RR-313, RR-315, RR-316, RR-317, RR-318, RR-320, RR-321, RR-323, RR-331, RR-332, RR-333, RR-339, RR-341, RR-342, RR-344, RR-347, RR-348, RR-351		separation from the Site. Extensive field surveys have found no evidence of regular use of significant numbers of over-wintering or passage birds. Subsequently, the Proposed Development will not negatively affect any such designation. Information to inform the HRA **[APP-151]** considers the potential for the Proposed Development to lead to adverse effects on European Sites, alone or in combination with other projects, it is concluded that Proposed Development is not considered to have likely significant effects on the Humber Estuary SPA and Ramsar Site and the Lower Derwent Valley SPA and Ramsar Site.
Hedgehogs	RR-040	*It has been raised that the impact of the Proposed Development on hedgehogs should be assessed. Concerns are raised about the decline in rural hedgehog populations due to habitat fragmentation and the importance of considering hedgehog presence in mitigation plans. Mitigation measures have been suggested, such as creating sloping sides on watercourses, to ensure hedgehogs can access these areas safely.*	Paragraph 8.4.96 of Chapter 8: Biodiversity of the Environmental Statement **[APP-028]** states that a single historical record of hedgehog was also returned in the data search. This record from 2002 was located 2km north-west of the Site. It is also considered likely that hedgehogs are present within on-Site/adjacent woodlands and utilise the linear field boundary features for foraging/commuting purposes. Existing linear field margin/woodland habitats (which will largely be retained) within the Site are considered likely to support hedgehogs, at least on an occasional basis. These species will be protected and avoided as part of the detailed CEMP to be agreed prior to construction work and significant habitat

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
			enhancements will be provided, benefitting local populations; as detailed within the oLEMP **[APP-143]**. The oLEMP also states that additional hedgehog habitat provision will be made through the inclusion of 30 hedgehog boxes within and bordering the Site. Precise locations will be subject to confirmation during the installation but will be focussed within sheltered and undisturbed locations within woodland and along boundary features such as hedgerows.
Cumulative Impact	RR-034	*Concern has been raised about the cumulative impact of multiple solar farms in and around the same village on local wildlife.*	The ecological cumulative effects associated with the Proposed Development have been assessed in section 8.6 of Chapter 8: Biodiversity of the Environmental Statement **[APP-028]**, including developments around Camblesforth. Total land take for renewable energy developments such as the Proposed Development is typically low (less than 5% footprint on the ground). Construction works are low impact and short-term and require limited excavation and ground disturbance for a temporary period of time, much of which will be undertaken on land subject to annual minor excavation and regular disturbance through tilling/ ploughing and normal agricultural management practices. There are no ecological cumulative direct effects on statutory or non-statutory designated sites or their associated qualifying interest species from the cumulative impacts of land take associated with the Proposed Development and the associated consented developments summarised in Table 15.1 of Chapter 15: Cumulative Effects **[APP-035]** during the construction or operational phases of the developments.

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
			Given the nature of the identified developments in paragraph 8.6.4 (and the Proposed Development), the actual land take and associated habitat loss is a small percentage, with construction effects, largely temporary and reversible. Habitat losses comprise low ecological value agricultural land, and the solar developments provide clear commitments to achieve significant measurable biodiversity gains. Cumulatively, this represents a local gain in habitats of ecological importance, which will also cumulatively strengthen habitat connectivity in the wider landscape. Areas within these developments will also be subject to lower levels of disturbance (resulting from the cessation of intensive arable management) and hence will provide areas of refuge for foraging and shelter for a range of species. Cumulative biodiversity benefits are therefore likely in relation to the Proposed Development and these four other solar application sites, as set out above. Subsequently, it is considered that impacts to habitats will be of high beneficial (positive) magnitude on a Local value and sensitivity, which are consequently significant beneficial effects. No significant cumulative effects on protected or notable species will occur because of the Proposed Development with mitigation measures in place as outlined in Chapter 8, and the other schemes considered as part of the cumulative impact assessment (either through considerate design, delivery of biodiversity benefits, good practice measures or avoidance, protection and mitigation measures). As a result, no significant adverse cumulative effects will result from all phases of the Proposed Development in combination with these other projects.

3.6. Climate Change

Table 3.5 – Climate Change

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
Carbon Footprint	RR-002, RR-003, RR-017, RR-055, RR-061, RR-067, RR-068, RR-073, RR-103, RR-125, RR-138, RR-140, RR-162, RR-164, RR-169, RR-181, RR-193, RR-201, RR-209, RR-237, RR-244, RR-247, RR-258, RR-276, RR-292, RR-300, RR-320, RR-322	*Concerns have been raised regarding about the lack of information on the lifetime carbon footprint of the Proposed Development and how it has been assessed. It has been suggested that the carbon footprint of the Proposed Development has not been fully evaluated, with little information available on the environmental costs of construction materials and their importation. It has been suggested that there is no clear assessment of the Proposed Development's total carbon footprint and sustainability, leading to questions about the lifetime carbon footprint of the solar panels and batteries, including their sourcing, manufacturing, and disposal. Concerns have been raised about the lack of recycling infrastructure for solar panels and the potential environmental impact.*	Embodied carbon emissions result from extracting raw materials, processing them, assembling them into usable products and transporting them to the Site for use during construction. It is noted that a large proportion of GHG emissions from a development may be accounted for within Scope 3 embodied carbon. The embodied carbon associated with the Proposed Development will be heavily influenced by the type and amount of material required to construct the Proposed Development. It is difficult at this design stage to accurately quantify the embodied carbon of the Proposed Development as the exact materials and their sources have not been finalised. However, the Applicant will follow due process in its procuring of solar panels and materials for the construction of the Proposed Development which will contribute to reducing the embodied carbon. For example, the Construction Environmental Management Plan to be implemented pre-construction will include requirements to minimise the creation of waste and maximise the use of alternative materials with lower embodied carbon, such as locally sourced products and materials with a higher recycled content, where feasible. These measures included in the CEMP will contribute to a reduction of embodied carbon and the lifetime carbon footprint of the Proposed Development. The lifetime of solar panels and batteries is increasing as technological advancements are made. By the time the

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
			Proposed Development is complete and operational, the technology of solar panels will be more advanced and efficient than at present, reducing the likelihood of solar PV panels having to be frequently replaced, overall improving their carbon footprint. Further details on including the disposal of solar panels, the recycling infrastructure for solar panels, and the potential environmental impact are considered below.
Decommissioning	RR-020, RR-044, RR-110, RR-137, RR-163, RR-199	*Concern has been raised about the energy required for the decommissioning, removal, and recycling of the Proposed Development. Uncertainty has been expressed about the long-term effects and disposal of solar panels, criticising the lack of thorough research and planning before implementing large-scale solar projects. Some suggest that the environmental impact of mining minerals for solar panels and their disposal has not been adequately considered. There are also questions about the energy required for the removal and recycling of the solar farm structures after 40 years, as well as concerns about the future disposal of solar panels and batteries and their environmental impact.*	Decommissioning is too far in the future to give an accurate representation of the energy required for the decommissioning, disposal or recycling of the Proposed Development. Decommissioning will be dealt with through the Decommissioning Environmental Management Plan (DEMP), as secured through DCO Requirement 5. The outline DEMP **[APP-123]** provides a framework for the measures which will be included.

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
Climate Emergency	RR-257	*The evidence for the climate emergency has been queried and, consequently, the necessity of the Proposed Development. Doubts have been expressed regarding the need for the Proposed Development, given the perceived lack of compelling evidence supporting the existence of a climate emergency.*	The primary planning policy document for nationally significant infrastructure projects for energy related developments is the Overarching National Policy Statement for Energy (EN-1) which, at paragraphs 3.2.6 - 3.2.8 (see below), makes it clear that the Applicant is not required to demonstrate the need for the Proposed Development as government has already determined that there is an urgent need. "*3.2.6 The Secretary of State should assess all applications for development consent for the types of infrastructure covered by this NPS on the basis that the government has demonstrated that there is a need for those types of infrastructure which is urgent, as described for each of them in this Part.* *3.2.7 In addition, the Secretary of State has determined that substantial weight should be given to this need when considering applications for development consent under the Planning Act 2008.* *3.2.8 The Secretary of State is not required to consider separately the specific contribution of any individual project to satisfying the need established in this NPS*."
Climate Impact of Proposed Development	RR-180, RR-347	*Concerns have been expressed about the impact of the Proposed Development on local weather patterns and potential heating effects, worrying about heat generation from shipping storage containers and its contribution to global temperature increases.*	Heat generation from elements of the solar farm, such as battery storage will be appropriately designed and operated in accordance with all applicable legislation. . Furthermore, green infrastructure throughout the Proposed Development will provide a thermal cooling effect, mitigating heat emissions from these sources, as well as providing further cooling during periods of climatic extremes. The *Heat Resilience and sustainable cooling report,* 2024*,* published by the Government's Environmental

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
			Audit Committee confirms that nature-based solutions to climate change such as green infrastructure have significant cooling effects.

3.7. Consultation

Table 3.6 – Consultation

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
Consultation Process	RR-002, RR-003, RR-011, RR-017, RR-026, RR-028, RR-032, RR-037, RR-050, RR-055, RR-056, RR-100, RR-103, RR-126, RR-136, RR-164, RR-174, RR-181, RR-190, RR-193, RR-204, RR-209, RR-212, RR-213, RR-226, RR-244, RR-276, RR-300, RR-301, RR-317, RR-320, RR-323, RR-326, RR-330, RR-331, RR-351	*Issues have been raised with the consultation process and whether local feedback has been considered. There is a perception amongst some members of the public of inadequate consultation with the local community, leaving many residents unaware of the Proposed Development's full impact. Some suggest that local views are dismissed by the Government and developers, with the Applicant failing to engage meaningfully with local communities. Concerns are raised about the lack of firm commitments for social benefits, with calls for firm promises, a community benefit fund, and engagement initiatives to support local schemes and education. There is mention of the community already contributing to national power needs without receiving the promised investment. The Applicant is criticised for paying 'lip service' to public consultation, failing to meet with local residents, and declining invitations from Parish Councils. Additionally, there is criticism of the lack of engagement from*	The Applicant acknowledges that consultation is an important part of the planning and development process. The Planning Act 2008 requires developers to publicise their proposals widely as well as consult with the local community, local authorities, statutory bodies and persons with an interest in the land potentially affected by the proposed Nationally Significant Infrastructure Project (NSIP). This process is referred to as 'pre-application consultation' and must be carried out before an application for a Development Consent Order (DCO) can be accepted by the Planning Inspectorate (PINS) on behalf of the Department for Energy Security and Net Zero. As set out in the Consultation Report **[APP-181]**, informal engagement and consultation first took place in the area around the proposed application site between 30 June 2022 and 28 July 2022, prior to the statutory consultation which took place in Autumn 2023. This informal consultation and engagement period included correspondence and meetings with relevant consultees and local representatives, launching of the project website and online information, and an introductory newsletter containing information about the proposals and forthcoming consultation, distributed to the communities within the vicinity of the site. Following the close of informal consultation, an ongoing period of engagement with relevant consultees took place as feedback was considered and the proposals refined.

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
		the overseas fund management company with local residents. It has been suggested that the Proposed Development is being forced upon the community to meet government targets without proper consideration. Concerns are also raised about the accuracy of the Consultation Newsletter, visual displays at the Public Consultation Exhibitions, the Concept Masterplan, and the effectiveness of the proposed planting for screening. There is a belief that local council incentives will not benefit those living outside of the villages.	During this period, several design changes were made to the Proposed Development as a result of consultation feedback and ongoing development design. Changes made at this point resulted in a reduction in the scale of the Proposed Development as well as: • Inclusion of buffers and offsets from residential houses to minimise impacts • Allocation of nearly 300ha across the site for new grasslands under and surrounding the panels. • Inclusion of over 10ha of new broadleaved woodland to be created across the site to screen the development. • Enhanced public access to link Camblesforth and Carlton through the inclusion of a new permissive path through the site. • Improvements to hedgerow field margins to help integrate the site within the landscape. • Confirmation of the cable route connection corridor via underground cable to minimise disruption. The steps above resulted in a reduction in the lead area from approximately 757 ha to approximately 476 ha. A period of statutory consultation was also undertaken between 26 October 2023 and 7 December 2023 (exceeding the statutory 28 day period). This period was extended to 22 December 2023 to allow for further responses. The statutory consultation period included local consultation events, an online virtual exhibition, local update newsletters, and website updates including copies of all consultation materials and relevant documents in line with the approach confirmed in the Statement of Community Consultation (SoCC) **[APP-201]**. Chapter 11 of the Consultation

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
			Report **[APP-181]** further discusses the process of consultation undertaken to comply with the relevant sections of the Planning Act 2008. . A Statement of Compliance has been prepared (Chapter 18 of the Consultation Report **[APP-201])** which confirms that the Applicant has complied with all relevant provisions. . Notices for the Proposed Development were published in accordance with Section 48 of the Planning Act 2008. This notice was published in several newspapers to ensure wide dissemination. Specifically, the notice was published for two successive weeks in the Selby Times and the Goole Times, and once in the Times and the London Gazette on 26 October 2023. The notice included details about the proposed development, how to access the consultation documents, and the deadline for responses. Throughout the period of statutory consultation, regular correspondence was sent to parish councils to encourage them to participate in the statutory consultation and provide formal feedback on the Proposed Development. In addition, to encourage participation from the parish councils and their communities, the Applicant posted hard copies of the Consultation Summary Document, Non-Technical Summary of the PEIR, Feedback Forms and USBs to each of the neighbouring parish councils to distribute to members of their communities who were not able to access documents. Table 14.2 provides an overview of the correspondence with the parish councils announcing the SoCC and throughout the statutory consultation period.

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
			Under Section 47 of the Planning Act 2008, the duty to consult lies with the Applicant, who is responsible for preparing and implementing a Statement of Community Consultation (SoCC). There is no statutory requirement in the Planning Act for third-party investors to be involved as part of the Applicant's consultation efforts.

3.8. Cultural Heritage

Table 3.7 – Cultural Heritage

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
Potential Harm to Heritage	RR-048, RR-143, RR-222, RR-256	*Concerns have been expressed about potential damage to heritage assets and the need for thorough archaeological surveys has been emphasised. There are worries about the irreversible loss of valuable resources and heritage, including the potential loss of historical and archaeological sites like the Roman Villa at Rushome. Some suggest that the Proposed Development could harm the setting of highly graded listed buildings, such as Camblesforth Hall and Carlton Towers, and potentially damage the Grade I listed Camblesforth Hall & Grange.*	Chapter 6: Cultural Heritage of the Environmental Statement **[APP-026]** sets out the assessment methodology undertaken to thoroughly assess the potential impact of the Proposed Development on heritage and archaeological assets. The assessment has been carried out in line with Historic England guidance and advice notes, comprising Statements of Heritage Significance: Analysis Significance in Heritage Assets, Commercial Renewable Energy Development and the Historic Environment, The Setting of Heritage Assets and Managing Significance in Decision-Taking in the Historic Environment The methodology utilised for this assessment has been informed by guidance documents and professional judgement, as there is no specific guidance or prescribed methodology for undertaking an assessment of the likely significant effects of a proposed development on cultural heritage. The assessment of the likely significant effects of the Proposed Development on cultural heritage has been informed by Appendix 6.1 Cultural Heritage Technical Appendix **[APP-125]** which contains the detailed heritage baseline information, and the initial assessment, in accordance with Step 1 and Step 2 of the Historic England guidance, of the identification of which assets have the potential to have their settings affected by the Proposed Development. As part of this, those assets which do not have the potential to have their settings affected have been scoped out from further consideration. This process is set out

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
			within the gazetteer at Appendix 1 of the Cultural Heritage Technical Baseline. Mitigation measures have also been committed to, where relevant, to reduce the significance of the identified adverse effects. Following initial assessment, three designated heritage assets were identified as having the potential to experience adverse effects from the Proposed Development, Grade I – Carlton Towers (NHLE Ref: 1295955); Grade I – Camblesforth Hall (NHLE Ref: 1173983); and Grade II - Manor Farmhouse (NHLE Ref: 1148398). Section 6.5 of Chapter 6: Cultural Heritage of the Environmental Statement **[APP-026]** discusses the potential significance of effects on these identified heritage assets. The Applicant's assessment identified no harm upon Camblesforth Hall and a minor adverse effect (at the lower end of 'less than substantial harm') upon Carlton Towers. A thorough approach to archaeological surveying and mitigation was employed. A geophysical survey and desk-based assessment were conducted, identifying areas of archaeological potential, including linear ditches and rectilinear enclosures. In consultation with the North Yorkshire Council Principal Archaeologist, an Archaeological Mitigation Strategy (AMS) **[APP-126]** was developed, incorporating 'no-dig' solutions in sensitive areas and an Archaeological Watching Brief during the excavation of the underground cable corridor. Findings indicated discrete areas of potential archaeological significance, such as possible prehistoric or Roman enclosures, rather than widespread impact across the site. This approach ensures significant archaeological resources are identified, recorded, and preserved where possible, minimising the impact on cultural

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
			heritage. No significant effects on archaeological assets have been found as per Table 6.5 within the Chapter **[APP-026]**.

3.9. Cumulative Impact

Table 3.8 – Cumulative Impact

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
Cumulative Impact of Energy Projects	RR-002, RR-003, RR-007, RR-011, RR-017, RR-044, RR-048, RR-050, RR-053, RR-054, RR-055, RR-056, RR-058, RR-061, RR-062, RR-067, RR-068, RR-069, RR-073, RR-076, RR-080, RR-082, RR-092, RR-093, RR-094, RR-096, RR-098, RR-100, RR-102, RR-103, RR-107, RR-111, RR-112, RR-114, RR-115, RR-119, RR-120, RR-135, RR-136, RR-137, RR-138, RR-139, RR-140, RR-141, RR-142, RR-144, RR-146, RR-147, RR-148, RR-149, RR-151, RR-152, RR-154, RR-155, RR-157, RR-159, RR-164, RR-170, RR-174, RR-177, RR-181, RR-186, RR-191, RR-196, RR-201,	*Concerns have been expressed regarding the cumulative impact of energy projects on Camblesforth, highlighting issues such as industrialisation, landscape impact, improper use of green belt, and mental health effects. The area already hosts Drax Power Station, leading to worries about the overall impact on East Yorkshire from multiple energy developments. There is general criticism of large companies prioritising profit over environmental and community considerations. The proximity to 13 other energy generating schemes within a 5-mile radius is seen as overwhelming for Camblesforth. Some suggest that the significant size of the Proposed Development compared to other solar projects makes local villages "guinea pigs", and there are concerns about the potential marginalisation of better systems due to government incentives.*	Environmental Statement Chapter 15: Cumulative Effects **[APP-035]** has considered the potential for likely significant intra project effects (i.e. the different types of effects resulting from the Proposed Development combining to have effects on the same receptor) and likely significant inter-project cumulative effects on the environment (i.e. those resulting from the Proposed Development combined with other relevant development in the area). Inter-project effects relevant to each specific topic have been considered and, where appropriate, assessed, under the 'Cumulative Effects' sub-heading in each topic chapter of the Environmental Statement. Inter-project effects have been assessed against the following definition in paragraph 5(e) of Schedule 4 to the EIA Regulations, 'the cumulation of effects with other existing and/ or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources.' The Planning Inspectorates Advice Note Seventeen: Cumulative effects assessment relevant to nationally significant infrastructure projects, has also been considered. A list of cumulative schemes has been provided to PINS and NYC for agreement at multiple stages. A list was provided as part of the Scoping Report, with an updated list provided in a letter to NYC in May 2023. A further updated list was provided in

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
	RR-209, RR-210, RR-211, RR-232, RR-243, RR-246, RR-251, RR-253, RR-256, RR-258, RR-265, RR-270, RR-273, RR-275, RR-276, RR-282, RR-283, RR-284, RR-285, RR-286, RR-287, RR-289, RR-295, RR-299, RR-300, RR-302, RR-306, RR-312, RR-314, RR-318, RR-320, RR-321, RR-322, RR-323, RR-324, RR-325, RR-329, RR-331, RR-339, RR-343, RR-346, RR-351		a letter to NYC in January 2024 to inform the assessment of cumulative effects undertaken for the Environmental Statement. Prior to the submission of the application, the list had last been reviewed in June 2024. The list of cumulative schemes is provided in Table 15.1 of the chapter. It was concluded that no significant cumulative effects were identified for the following topics (in relation to cumulative schemes), Cultural Heritage, Water Environment, Transport And Access, Noise and Vibration, Climate Change, Socio Economics, and Soils and Agricultural Land. The cumulative effects of the Proposed Development combined with two solar cumulative schemes (Land South of A645, Wade House Lane, Drax (ref: 2023/0128/EIA) and Land North and South of Camela Lane, Camblesforth (ref: 2021/0788/EIA)) during the operational phase will be significant. Following the establishment of proposed planting, the degree to which the Proposed Development and the cumulative schemes will be perceived within the landscape will be reduced, however due to the collective large extent of the solar farms and their duration, it is considered that a major/moderate adverse (significant) effect would remain during operation as a consequence of the Proposed Development in combination with the cumulative schemes. In the context of biodiversity, it has been concluded that identified cumulative developments make clear commitments to achieve measurable biodiversity gains; therefore, a high beneficial (significant) cumulative effect to habitats has been identified at the local level. With the implementation of the outline Landscape Environmental Management Plan (oLEMP)

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
			[APP-143] and BNG commitments, the Proposed Development is considered likely to lead to beneficial cumulative impacts on habitats during both the construction and operational phases of the Proposed Development, which therefore represent a significant beneficial effect. It has also been identified that the Proposed Development in combination with identified schemes will produce renewable energy and therefore when combined with the operational Proposed Development there will be a significant major beneficial cumulative effect on renewable energy generation in the Yorkshire and the Humber region, during the operational phase.
Energy Contribution in Area	RR-056, RR-062, RR-082, RR-094, RR-284, RR-320	*It has been suggested that the local area has sufficiently contributed to the national energy supply due to other energy developments in the area, particularly highlighting the significant contribution of Drax Power Station. It has been suggested that the area already contributes significantly to the national grid, and further development is seen as an unfair burden. There is a belief that the area is already meeting government targets for energy provision. While acknowledging the urgent need for renewable energy, there are concerns about the disproportionate burden placed Camblesforth residents,*	Both NPS EN-1 and EN-3 confirm there is an urgent need for Critical National Priority Infrastructure which is key for the Government to achieve their energy objectives and Net Zero and EN-3 (3.3.20) notes that the government analysis shows that a "secure, reliable affordable, net zero consistent system in 2020 is likely to be composed predominantly of wind and solar". NPS EN-1 at paragraphs 3.2.3 -3.2.4 states that it is not the role of planning to deliver specific amounts or limit any form of infrastructure covered by the NPS such as solar projects. The government wants industry to propose viable projects in line with government's strategic framework. It goes on to say that it is not the government's intention through the NPSs to "*propose limits on any new infrastructure that can be consented in accordance with the energy NPSs"* and that such consented projects *"can help deliver an affordable electricity system, by driving*

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
		with some suggesting that local villages are unfairly impacted by these developments.	*competition and reducing costs within and amongst different technology and infrastructure types. Consenting new projects also enables projects utilising more advanced technology and greater efficiency to come forward*". It is therefore clear that the government, through planning policy, is not looking limit certain projects by location and there is no planning policy which applies in respect of a region having "done its bit". The cumulative impacts of the Proposed Development are relevant and have been assessed accordingly in the environmental statement.

3.10. Design

Table 3.9 – Design

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
Solar PV Specifications	RR-017, RR-050, RR-055, RR-067, RR-103, RR-156, RR-350, RR-194, RR-316, RR-068, RR-073, RR-078, RR-101, RR-136, RR-162, RR-202, RR-213, RR-253, RR-336	*Concerns have been raised regarding the proposed solar PVs and associated infrastructure, including concerns about their safety and potential noise impact. There are concerns about the size and height of the panels, and that these are larger than any currently used in the UK. Additionally, there are concerns about the sourcing of these materials and their recyclability.*	An assessment of the likely significant effects of the Proposed Development with respect to noise and vibration has been carried out within Chapter 11: Noise and Vibration of the Environmental Statement **[APP-031]**. The assessment of the likely significant noise and vibration effects resulting from the construction and decommissioning phases of the Proposed Development, arising from construction and decommissioning activities, concluded that effects will be short-term and temporary, and no greater than negligible at the closest (Noise Sensitive Receptors) NSR to any construction and decommissioning activities. No mitigation measures beyond the implementation of construction best practice measures will be required, to ensure that all construction noise and vibration effects are not significant. For the Proposed Development's operation, the assessment has considered a set of reasonable worst-case, candidate input parameters and on this basis, it has been predicted to give rise to no worse than a negligible effect at the assessed NSRs. The Applicant is not proposing to adopt unknown solar panel technology as part of this development. Although it is acknowledged that the direct current generating capacity of each solar PV module will depend on advances in technological capabilities at the time of construction, the solar panels will be those formed by a series of monofacial or bifacial, mono-

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
			crystalline 'solar cells' which is adopted on both a commercial and domestic scale across the UK. The Applicant has not specified a make or manufacturer of panel as this would place an unnecessary restriction on its ability to procure the most appropriate product. In order to maintain flexibility in the design and layout at this stage in the process, the assessment of the Proposed Development, in accordance with NPS EN-1, has adopted the Rochdale Envelope approach, as described in the *PINS Advice Note Nine: Rochdale Envelope* (July 2018). The Applicant has however specified the approach to assessing maximum parameters in Table 3.2 of Chapter 3: Site and Development Description **[APP-023]**, which include the following: • Maximum Height of Panels: Up to 3m above existing ground levels • Minimum Height of Panels: Up to 900mm above existing ground levels • Minimum gap between panels: 2m • Maximum slope of PV Modules from the Horizontal: 60^{o} • PV Module Material: Silicon glass and include an anti-reflective coating • Mounting Structure Material: Anodised aluminium alloy or galvanized steel with rough matte finish • Foundation Type: Piling or concrete feet foundation • Maximum Depth of Piles: Up to 2.5m It is anticipated that all above ground infrastructure such as the solar PV modules, mounting structure, cabling (within the Solar Farm, Substation and BESS compound and Underground Cable Corridor Zones), inverters and transformers will be removed and recycled or disposed of in accordance with good practice and

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
			market conditions at that time as per the outline DEMP **[APP-123]**. Additional information on the recycling of materials is expected to be provided in the detailed Decommissioning Environmental Management Plan (DEMP), which will be prepared prior to the decommissioning of the Proposed Development. As a Requirement of the DCO, a detailed DEMP, or multiple detailed DEMPs for phases of the Proposed Development will be prepared and approved by North Yorkshire Council ('NYC') prior to commencement of the Proposed Development's decommissioning phase.
Scale	RR-001, RR-105, RR-151, RR-276, RR-295, RR-329	*Some RRs acknowledge the necessity and benefits of renewable energy but criticise the scale of the proposed solar infrastructure. The RRs state that the Proposed Development is set to take up a large area of land equivalent to 1,200 football pitches for the next 40 years, which some suggest is overbearing and changes the rural character and community spirit.*	Large areas of land are required for large scale solar development, and contiguous sites reduce the need for excessive cabling. Further, open fields without vegetated boundaries mean less vegetation will be removed during construction. Fewer fields also means the buffering around field edges for tree root protection and the avoidance of shading can be reduced. Therefore, sites with larger open fields of a regular shape which were within the search area were preferred.
Layout	RR-058	*There are concerns about the layout of the Proposed Development, describing the scheme as disjointed and incoherent due to successive landowners offering up land opportunistically.*	The layout of the Proposed Development has been influenced by a variety of factors including environmental constraints, land allocations and designations and the availability of landowners with an interest in being involved with the Proposed Development.

3.11. Glint and Glare

Table 3.10 – Glint and Glare

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
Glint and Glare	RR-007, RR-008, RR-019, RR-057, RR-077, RR-148, RR-201, RR-226, RR-256, RR-264, RR-273, RR-284	*Doubts have been expressed regarding glare affecting residential, road, and rail areas. They highlight constant sun glare impacting residents and describe the sun glare on the A1041 road as hazardous to drivers. Additionally, there are worries about glare impacting work productivity: one member of the public has expressed concern that glare from the solar farm, which they expect to last an hour daily, would impact their work from home environment.*	An assessment of possible effects of glint and glare from the Proposed Development has been undertaken and is included in the application, Environmental Statement Appendix 2.5 - Solar Photovoltaic Glint and Glare Study **[APP-117]**. This assessment evaluated multiple receptors, focusing on 104 identified dwellings with the geometric potential to be affected by the Proposed Development. The analysis concluded that, with the implementation of the Landscape Strategy, no impacts are anticipated on 98 of these dwellings, making additional mitigation measures unnecessary. For the remaining 6, there are sufficient mitigating factors which would remove the need for further mitigation. As stated in Environmental Statement Appendix 2.5 - Solar Photovoltaic Glint and Glare Study **[APP-117]**, the results of the analysis have shown that solar reflections from the Proposed Development are geometrically possible along approximately all of the assessed sections of road along the A1041, A645, Barlow Road, Common Lane, Hirst Road and Station Road. Where solar reflections are geometrically possible inside a road user's primary field of view, along a combined 4.1km section of road, existing and proposed vegetation and buildings will remove visibility of any solar reflections. Therefore, no impacts from the Proposed Development are predicted, and mitigation is not required for these sections of road.

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
Gliding	RR-008, RR-019	*There are concerns that solar panels will pose risks to gliding through glint and glare. Some additional concerns include the impact on pilots during landing, with the Proposed Development creating hazards for glider pilots and increasing the risk of mid-air collisions. Solar reflections from the panels are expected to impact pilots and nearby dwellings, as well as insufficient information on the impact of glint and glare on pilots during landing. Additionally, there is a worry about the reduction in available emergency landing site options, particularly from runway 15.*	The impacts of glint and glare on aviation receptors has been assessed within the context of two identified airfields, Burn Airfield and Cliffe Airfield. Detailed results from the assessment of aviation receptors can be found in section 7.1 of the report but are summarised as follows. The results of the analysis for Burn Airfield (runways 01/19, 07/25 and 15/33) and Cliffe Airfield (runway 10/28) have shown that no solar reflections towards pilots approaching runway 10 are geometrically possible. Therefore, no impacts from the Proposed Development are possible and mitigation is not required. Solar reflections with 'potential for temporary after-image' are predicted towards runways, 01, 07, 15, 19, 33, and 28. However, following further assessment of the predicted reflections in an operational context, it can be concluded that the glare is operationally accommodatable. Solar reflections from the Proposed Development with 'potential for temporary after-image' are predicted towards the runway 25 approach. Following further assessment of the predicted reflections in an operational context, the impacts are considered significant (prior to mitigation) and mitigation is required. Potential mitigation for the Proposed Development can include fixing the Single Access Tracker System at a resting angle that would avoid significant effects at the times at which glare for the runway 25 approach is predicted. The Applicant is undertaking additional assessment work in connection with the activities of Burn Gliding Club and this will be submitted at a future Deadline. It is not possible to state

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
			which deadline at this stage as it is dependent on receiving information from Burn Gliding Club.

3.12. Ground Conditions

Table 3.11 – Ground Conditions

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
Land Contamination	RR-127, RR-236	*Uncertainty has been expressed about serious pollution being caused by groundworks leading to a risk of land contamination.*	The Preliminary Risk Assessment, referred to as the Phase 1 Ground Conditions Assessment, is provided at ES Appendix 2.4 **[APP-114]**. The Assessment identifies potential sources of contamination on-Site and off-Site, and their potential pathways to a receptor. The Assessment concludes that potential pollutant linkages identified on-Site are able to be mitigated through the implementation of standard mitigation measures, to be secured via DCO requirement 4. Significant effects are not anticipated; therefore it has been agreed to scope this topic out of the Environmental Statement.

3.13. Landscape and Views

Table 3.12 – Landscape and Views

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
Landscape Impact	RR-003, RR-006, RR-008, RR-011, RR-017, RR-019, RR-020, RR-021, RR-023, RR-026, RR-028, RR-030, RR-031, RR-033, RR-041, RR-042, RR-049, RR-051, RR-052, RR-053, RR-054, RR-055, RR-056, RR-058, RR-063, RR-066, RR-067, RR-068, RR-071, RR-073, RR-075, RR-085, RR-096, RR-097, RR-098, RR-099, RR-100, RR-101, RR-103, RR-104, RR-105, RR-110, RR-113, RR-114, RR-115, RR-116, RR-118, RR-120, RR-121, RR-124, RR-125, RR-129, RR-131, RR-134, RR-135, RR-139, RR-142, RR-145, RR-146, RR-148, RR-149, RR-150, RR-152, RR-153, RR-154, RR-156, RR-157, RR-161, RR-164, RR-166, RR-167, RR-170, RR-173, RR-174, RR-175, RR-178, RR-180, RR-182, RR-185, RR-187, RR-192, RR-193, RR-195, RR-198, RR-200, RR-201, RR-202, RR-203, RR-204, RR-205, RR-206, RR-208, RR-209, RR-212, RR-214, RR-221, RR-223, RR-225, RR-226, RR-229, RR-231, RR-234, RR-236, RR-239, RR-243, RR-250, RR-251, RR-252,	*Concerns have been raised that the Proposed Development will change the character of the landscape, fearing that the countryside will become industrialised. They highlight the impact on the countryside, turning it into an industrial site and encasing historic land settlements. The landscape is expected to be spoiled with steel racks, solar panels, and fences. Concern has been expressed that the Proposed Development will impact the Green Belt. There are concerns that the Proposed Development will replace countryside views and walks with solar panels and storage batteries, leading to worries about losing the countryside. It has been suggested that the large solar installation may detract from the natural appeal, introducing an industrial appearance that clashes with the rural character, and object to building solar farms*	The Proposed Development will have a major to moderate, significant impact on the Site's landscape character, particularly in the early years of operation, due to the introduction of solar PV panels and associated infrastructure. While the landform will largely remain unaltered, except for minor modifications in the Substation and Battery Energy Storage System (BESS) Compound, the addition of these structures will change the Site's appearance and how it is perceived. Although a comprehensive landscape strategy has been designed to mitigate visual and landscape effects, the newly implemented planting will have limited immediate impact. By year 15, however, the planting is expected to be well-established, helping to restore fragmented hedgerows and enhance the Site's landscape character, biodiversity, and habitat connectivity. Despite the built elements remaining visible, this strategy is projected to reduce the impact to a moderate adverse level, which is not considered significant, especially given the reversible nature of the Proposed Development after its 40-year operational phase. A Landscape Strategy Plan **[APP-054]** has been submitted as part of the application. The Proposed Development is not within the Greenbelt, the nearest greenbelt is approximately 5.4km west of the Site.

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
	RR-253, RR-254, RR-256, RR-258, RR-262, RR-265, RR-273, RR-274, RR-275, RR-283, RR-284, RR-285, RR-287, RR-288, RR-290, RR-291, RR-297, RR-298, RR-299, RR-306, RR-307, RR-312, RR-317, RR-320, RR-321, RR-325, RR-330, RR-333, RR-343, RR-344	*close to residential areas. There are concerns that Proposed Development will ruin the village of Camblesforth and pollute the skyline, and that planting proposals are insufficient to screen the Proposed Development for at least 15 years.*	
Visual Impact	RR-005, RR-032, RR-048, RR-050, RR-057, RR-062, RR-079, RR-080, RR-082, RR-090, RR-119, RR-127, RR-147, RR-162, RR-168, RR-171, RR-178, RR-186, RR-189, RR-191, RR-211, RR-215, RR-216, RR-228, RR-237, RR-246, RR-247, RR-271, RR-292, RR-300, RR-301, RR-302, RR-311, RR-315, RR-318, RR-331, RR-350, AS-004	*Concerns have been raised about the visibility of the Proposed Development from residential areas, noting that the visual impact of over 1,000 acres of solar panels will damage the surroundings and nature. The large-scale Proposed Development is seen as posing risks to the local landscape, ecology, and visual aesthetics, leading to a loss of view and impact on wildlife. Some members of the public have expressed that the area's scenery is becoming industrialised, with no unspoiled views remaining due to existing pylons, Drax Power Station, and wind turbines. Stating the Proposed Development is expected to change the views*	A Landscape and Visual Impact Assessment **[APP-134]** has been carried out as part of the application. The scale of change attributable to the Proposed Development will remain small/negligible, perceived over a medium extent, resulting in a slight effect magnitude. In combination with the low sensitivity of receptors, this will result in a minor/negligible and not significant effect, particularly in the context of the baseline large scale industrial built form at Drax Power Station.

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
		surrounding Camblesforth village, introducing visual pollution from solar panels and infrastructure, which will alter the area's character. While the low height of the panels means they are less visible compared to Drax Power Station, there are still concerns about the loss of natural outlook, privacy issues, and the overall visual impact from the solar panels.	
Cumulative Impact	RR-166, RR-179, RR-241	*Concerns have been raised about the cumulative impact of multiple energy developments on the landscape. It is suggested that the Proposed Development's scale, combined with existing solar developments, is impossible to mitigate and will drastically alter the rural landscape. There are worries about the combined effect of multiple solar farms, a carbon capture plant, an energy pipeline, and an ash plant, which are seen as changing the landscape. Additionally, there are concerns about being surrounded by solar panels in addition to the existing power station.*	A cumulative landscape and visual assessment has been carried out. This identifies that the key effect relates to LCA 15 Camblesforth Farmland, where a significant adverse effect is predicted for the operational phase of the Proposed Development. This is due to the concentration of development that are proposed within this LCA and the footprint they would occupy. The Proposed Development would make a noticeable contribution to these effects, partly due to the extent of the solar PV panels, and partly due to the way it would extend the footprint of development away from the concentration of development around Drax. Significant cumulative effects have also been identified in relation to residents on the western edge of Camblesforth, but these would reduce to become not significant once the planting is sufficient established to screen views of the solar PV arrays. It is also important to recognise that the Proposed Development will have a defined lifespan and the relatively light footprint makes it relatively easy to reverse the changes which will occur. The proposed landscape strategy will

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
			also make a tangible contribution to the local landscape as it establishes during the operational phase.

3.14. Noise

Table 3.13 – Noise

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
Construction Noise Impact	RR-002, RR-003, RR-048, RR-049, RR-050, RR-082, RR-092, RR-119, RR-130, RR-138, RR-140, RR-163, RR-192, RR-214, RR-221, RR-227, RR-231, RR-236, RR-300, RR-305, RR-331, RR-341, RR-347	*Concerns have been raised that the construction phase of the Proposed Development will generate noise, impacting residents. The construction is expected to last up to three years, causing dust and noise pollution. There are worries about a continuous high-pitched buzz from Battery Energy Storage Systems (BESS) and construction noise over the three-year period. Concerns also include construction noise, vibrations, and long-term noise from battery storage equipment, as well as noise from site preparation, maintenance, and solar panels. Potential noise pollution from construction activities is expected to affect the quiet roads used for walking and horse riding.*	An assessment of construction noise has been undertaken within Environmental Statement Chapter 11: Noise and Vibration **[APP-031]**. This assessment has been carried out under the realistic 'worst-case scenario', worst-case construction noise levels during the erection of infrastructure have been predicted at the closest noise sensitive receptors (NSR). Table 11.10 within the chapter presents the predicted construction sound level summary, it identifies that the noise levels are not predicted to exceed the adopted 65 dB(A) limit when works are undertaken at the closest point of the works to the closest off-site NSR.
Operational Noise Impact	RR-002, RR-004, RR-005, RR-007, RR-012, RR-014, RR-017, RR-027, RR-038, RR-047, RR-055, RR-057, RR-059, RR-067, RR-068, RR-073, RR-077, RR-081, RR-090, RR-098, RR-099, RR-100, RR-101, RR-102, RR-103, RR-104, RR-105, RR-107,	*Issues have been raised that the operational phase of the Proposed Development will generate noise, particularly from BESS and solar panels tracking the sun. There are worries about heavy machinery causing constant disturbances and*	It has been concluded that the Proposed Development's operation would occur with no effect to minimal effect to the amenity of the closest residential NSRs to the site. The operational noise impact of the BESS is expected to be minimal at nearby sensitive receptor (NSR) locations. The battery cooling systems generally operate continuously during most charging and discharging periods, with

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
	RR-109, RR-112, RR-113, RR-121, RR-125, RR-127, RR-134, RR-136, RR-137, RR-142, RR-147, RR-148, RR-150, RR-154, RR-155, RR-160, RR-162, RR-164, RR-166, RR-167, RR-174, RR-176, RR-179, RR-180, RR-182, RR-189, RR-193, RR-196, RR-201, RR-202, RR-204, RR-205, RR-206, RR-209, RR-210, RR-216, RR-229, RR-237, RR-240, RR-243, RR-246, RR-247, RR-253, RR-255, RR-256, RR-257, RR-258, RR-264, RR-265, RR-273, RR-275, RR-276, RR-284, RR-298, RR-302, RR-307, RR-311, RR-313, RR-320, RR-323, RR-324, RR-333, RR-336, RR-339, RR-351	*potential background noise from batteries and inverters, which can be damaging to health and well-being. The placement of 100 BESS units is expected to produce hazardous noise levels, affecting residents' health and well-being. There are also concerns about noise from photovoltaic panels as they move to follow the sun, raising questions about their effectiveness and safety. Additionally, there are worries about noise from solar panels, especially during rain, and the overall impact of construction work, which will be hazardous and irritating to residents.*	occasional intermittent operation during cooling phases. During these quieter cooling periods, the systems do not switch on or off simultaneously, making any intermittency unlikely to be perceptible at NSR locations. While there may be a potential low-frequency bias at the source, the distance to NSRs and the existing residual acoustic environment are anticipated to mask any significant tonal or low-frequency noise characteristics.

3.15. Planning Policy

Table 3.14 – Planning Policy

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
Selby Local Plan	RR-221, RR-231	*It has been suggested that the Proposed Development contravenes key objectives of the Selby Local Plan, indicating non-compliance with the plan's guidelines.*	The Proposed Development is deemed to be compliant with both national and local planning policy. Planning Statement Appendix 1: Local Plan Accordance **[APP-226]** provides a review of relevant local planning policy applicable to the Proposed Development. The following policy documents have been considered as relevant in the context of local policy, Selby District Local Plan (2005), North Yorkshire Minerals and Waste Joint Plan 2015-30 (2022) and the Draft Selby Local Plan – Publication Version Consultation (2022).
National Policy Statements	RR-232, RR-284	*Concerns have been raised that the Proposed Development contravenes the National Policy Statement for Renewable Energy Infrastructure (EN-3), particularly regarding Best and Most Versatile (BMV) land. There are references that the NPS EN-3 states a preference for poorer quality land over BMV land for such developments.*	National Policy Statement for Renewable Energy Infrastructure (EN-3) does not prohibit the use of agricultural land. Table 4.1 within the Planning Statement **[APP-228]** describes the Government's view that large capacities of low-carbon generation will be required to meet increased demand and to support the phasing out of fossil fuel-based methods of energy production. In reference to paragraph 2.3.6, it states, in the context of meeting our Net Zero target, we need to "We need to transform the energy system, tackling emissions while continuing to ensure secure and reliable supply, and affordable bills for households and businesses. This includes increasing our supply of clean energy from renewables, nuclear and hydrogen manufactured using low carbon processes"

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
			The NPPF does not explicitly rule out development on agricultural land, it instead states that "Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality." This is supported within NPS EN-3, paragraph 2.10.30 which states "Whilst the development of ground mounted solar arrays is not prohibited on Best and Most Versatile agricultural land…the impacts are expected to be considered." As detailed in Planning Statement Appendix 2: Alternative Site Assessment **[APP-227]**, paragraph 2.6.29, a search was conducted for suitable non-agricultural brownfield land within a viable distance from the point of connection at Drax Power Station. However, the available land identified through this search was limited in size and fragmented, making it unsuitable for large-scale solar development. The impacts on agricultural land are considered in Chapter 14 of the Environmental Statement **[APP-034]**.
Zoning	RR-081, RR-168	*Legal questions have been raised regarding the suitability and compliance of the Proposed Development with local zoning regulations, noting that the Proposed Development is not located within any permitted development areas.*	The concerns raised about the Proposed Development's compliance with zoning regulations reflect a misunderstanding of the planning framework in the Selby Local Plan area, which operates under a development management system rather than a zoning-based system. However, the primary planning policy relevant to the Proposed Development are the National Policy Statements. While the polices in the local plan are a material consideration the Site is not within any policy or allocation area that would make it unsuitable for development.

3.16. Principle of the Proposed Development

Table 3.15 – Principle of the Proposed Development

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
Renewable Energy	RR-129, RR-106, RR-228, RR-235, RR-269, RR-303	*Support has been expressed for renewable energy, viewing the Proposed Development as beneficial for the whole community by using environmentally sustainable energy. The Proposed Development is supported for its clean energy potential and its ability to create sustainable energy with a modest impact. The Proposed Development is seen as a renewable and less polluting energy option, with the added advantage of proximity to existing energy networks. There is also support for the Proposed Development's contribution to reducing the carbon footprint.*	The Applicant notes and welcomes support for the principle of the Proposed Development as a renewable energy project.
Applicant	RR-002, RR-003, RR-008 RR-017, RR-031, RR-055, RR-058, RR-125, RR-132, RR-147, RR-160, RR-164, RR-179, RR-191, RR-193, RR-199, RR-209, RR-212, RR-249, RR-251, RR-	*Concerns have been expressed about the legitimacy of the application and its funders, particularly noting that the funding is from overseas. There are worries that the Proposed Development is primarily a money-making scheme, with some suggesting that the applicant's motives are driven by greenwashing and profit ambitions.*	The Funding Statement **[AS-012]** contains information about the Applicant and how the Proposed Development will be funded.

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
	259, RR-265, RR-293, RR-300, RR-327	*Criticism has been directed at the Proposed Development's motives, with suggestions of ease, laziness, and greed. Additionally, there are concerns about the foreign company's qualifications and interests in the Proposed Development.*	
Insufficient Energy Generation	RR-077, RR-128, RR-149, RR-195, RR-222, RR-350	*Concerns have been raised that the energy generated by the Proposed Development is insufficient and represents a short-term solution. The Proposed Development is seen as a box-ticking exercise to meet green targets without producing significant power. There is criticism that the Proposed Development is a short-term solution causing long-term harm, with some arguing that public subsidies should support rooftop solar installations instead. Concerns include insufficient sunlight to justify the Proposed Development and doubts about the efficiency of solar panels in the local climate.*	The Proposed Development is a renewable energy generation development and will therefore contribute to the Government's carbon emissions and climate change targets. The Proposed Development would also increase the country's energy security through diversifying the grid and improving energy affordability due to being the cheapest form of electricity generation.
Viability	RR-079, RR-110, RR-215	*Doubts have been raised about the viability of solar development given the limited sunlight in the area. Concerns question the effectiveness of solar panels due to insufficient sunny days*	As set out in section 4.5 of Chapter 4: Alternatives and Design Evolution of the Environmental Statement **[APP-024]**, a viable solar PV generation scheme must be located near to existing grid infrastructure, so it is able to export renewable electricity it has generated. On a more regional scale, paragraph 4.5.6 states

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
		and emphasise the need for self-sustainability, especially considering lessons from the war in Ukraine. There are concerns about the long-term viability of solar farms and the potential for these projects to become derelict over time.	that land within North Yorkshire, and the more localised site selection area surrounding the grid connection, is considered as having potential to locate a large scale solar development due to the large open area of undeveloped land, characterised by gently undulating topography, which would provide uniform exposure to irradiance, and generally sparse settlement patterns. The Proposed Development is temporary and will be decommissioned after 40 years.
Decision-Making Process	RR-252, RR-253, RR-257, RR-258, RR-287, RR-327, RR-332	*Concerns have been raised about the decision-making process and whether local views are being considered. There are worries about being forced to accept green initiatives and their impact on local decision-making. Additionally, there are suggestions that the balance between energy and food security is at risk, with particular emphasis on the UK's Net Zero target potentially conflicting with national food security and the future of farming. Financial inequality and the lack of benefits for residents have also been highlighted. Criticism has been directed at the government's approach to achieving net zero by covering land with solar panels, with some viewing the Proposed Development as a financial decision rather than one driven by the UK's*	The Proposed Development is a Nationally Significant Infrastructure Project (NSIP) under Sections 14(1)(a) and 15(2) of the PA 2008, as the Proposed Development is for the construction of an onshore generating station in England with a capacity exceeding 50MW. As such, the Proposed Development requires development consent through a DCO to be able to proceed. The PA 2008 prescribes that the SoS is responsible for determining an application for development consent, with the power to appoint an Examining Authority (ExA) of appointed person(s) to manage and examine the application. The ExA will make the procedural decisions and examine the application. The ExA will then make a recommendation to the SoS, who will then decide whether to grant a DCO taking all material considerations into account. Local views are heard and considered as part of the application and decision making process by way of statutory consultation and the ability to make representations to the Examination as well as attend Open Floor Hearings (amongst others) to voice any concerns..

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
		energy needs. Concerns about the long-term impact of solar panels and scepticism about government decision-making have also been expressed.	

3.17. Safety

Table 3.16 – Safety

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
Fire Risk	RR-002, RR-017, RR-027, RR-028, RR-036, RR-044, RR-049, RR-057, RR-061, RR-078, RR-082, RR-084, RR-090, RR-091, RR-092, RR-101, RR-102, RR-107, RR-119, RR-124, RR-147, RR-161, RR-175, RR-176, RR-186, RR-187, RR-189, RR-191, RR-192, RR-193, RR-194, RR-202, RR-206, RR-209, RR-210, RR-233, RR-237, RR-243, RR-246, RR-248, RR-249, RR-250, RR-251, RR-252, RR-254, RR-255, RR-256, RR-258, RR-259, RR-260, RR-265, RR-276, RR-316, RR-320, RR-324, RR-333, RR-336, RR-339, RR-340, RR-351, AS-004	*Concern has been raised about the fire risk associated with BESS. Housing 100 units near residential areas is seen as presenting a significant fire hazard with potential toxic emissions. There are worries about the impact of fires or industrial accidents on local residents and the environment. Additionally, concerns have been raised about the danger of explosion or fire from battery storage poses potential health threats. Risks have been highlighted regarding the proximity of battery storage to dwellings, including fire hazards and the impact of prevailing winds.*	A BESS Safety Management Plan **[APP-119]** has been produced to define the proposed safety strategy, requirements, and processes necessary to meet agreed safety objectives and to set a level of safety performance that the BESS is to be measured against. It also provides the basis for the safety management processes and procedures required to satisfy the identified safety requirements for the BESS. Consultation and communication has also been undertaken with North Yorkshire Fire and Rescue Service (NYFRS) which have informed the outline BESS safety management plan. The BESS Safety Management Plan is secured by Requirement 9 of the dDCO.
Battery Energy Storage System (BESS)	RR-051, RR-054, RR-055, RR-059, RR-064, RR-067, RR-068, RR-073, RR-103, RR-110, RR-112, RR-125, RR-130, RR-136, RR-137, RR-138, RR-140, RR-145, RR-146, RR-152, RR-162, RR-163, RR-164, RR-179, RR-184, RR-201, RR-213, RR-216,	*Concerns have been raised about the health and safety of battery storage units, particularly when these units are located near residential properties, due to the risks of fire and toxic emissions. The proximity of BESS units to dwellings is seen as a significant health and safety risk because of potential toxic emissions. Additionally, there*	

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
	RR-284, RR-288, RR-302, RR-305, RR-312, RR-323	*are worries about potential damage to properties from vibrations caused by construction activities. There are concerns that the risks of hydrofluoric acid from battery fires are particularly troubling, especially given the lack of detailed safety information from Enso. There are also questions about the financial bonds for decommissioning and the long-term management of the Proposed Development.*	
Hazardous Materials	RR-002, RR-050, RR-067, RR-068, RR-073, RR-076, RR-100, RR-166, RR-169, RR-180, RR-181, RR-182, RR-193, RR-209, RR-347, RR-350	*Concern has been raised about the hazardous materials used in the Proposed Development, particularly toxic metals in solar panels. They highlight that solar panels contain hazardous materials such as cadmium and lead, which pose long-term environmental risks. There are worries there is insufficient infrastructure for e-waste management. Concerns have also been raised about potential soil contamination from caesium in solar panels. The presence of toxic compounds such as cadmium compounds, silicon tetrachloride, hexafluoroethene, and lead has been noted as an issue.*	The solar photovoltaic panels are constructed off-site and are delivered and installed as sealed units. The Phase 1 Ground Conditions Assessment and Update Note **[APP-114]** states that the potential for identified sources of potential contamination to affect receptors (human health, groundwater, surface water, buildings) has been assessed during construction and operation of the Proposed Development. The assessment identifies that appropriate mitigation measures to negate the risk to health and contamination can be identified following further investigations on Site. Furthermore, best practice measures such as the adoption of good working practises and activity specific risk assessments and method statements (RAMS) will be implemented during the construction and decommissioning phases. Following, the implementation of appropriate mitigation measures it is unlikely that significant risks to receptors would remain and therefore likely significant effects on

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
			land contamination from the Proposed Development are not anticipated.
Construction	RR-009, RR-328	*Issues have been raised about safety during the construction period, particularly its impact on local health. Concerns specifically mention that many of the houses in this area are underpinned and as such could be susceptible to damage during the construction period. It has been mentioned that in some cases, building insurance does not cover the underpinning, and as such any damage potentially caused by the construction process may not be covered by insurance. Additionally, there are broader health and safety concerns during both the construction and operation phases of the Proposed Development.*	A technical note has been prepared as part of the Application to provide information regarding the potential effects to human health of the Proposed Development. The Population and Human Health Technical Note **[APP-118]** concluded that there are no significant beneficial or adverse effects identified during construction in relation to population and human health. The Applicant notes the concerns raised in respect of residential properties that have been underpinned in the area, however, the construction of the Proposed Development is not expected to have any impact on the integrity of any residential properties.
Untested Technology	RR-003, RR-174, RR-204, RR-270	*Concerns have been expressed about the new types of panels and the large amount of BESS units, highlighting health and safety issues for residents and environmental risks. There are worries about the untested nature of the proposed solar panels and their potential risks. Additionally, questions have been raised regarding the safety and testing of both the proposed solar panels and battery storage systems.*	There are a number of solar farms and battery energy storage systems operating within the UK. The technology has been tried and tested in the UK and across many other countries. The procurement of the components for the Proposed Development will take place at the appropriate time following the making of any Development Consent Order and will be subject to the Applicant's procurement policy in place at the time.

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
Gas Pipe	RR-247	*Concerns have been expressed about the safety of the main gas pipe running through the site.*	The Applicant is aware of the presence of the National Gas Transmission Pipeline and is in discussions with National Gas Transmission to ensure that the main gas pipe is protected

3.18. Socio-Economics

Table 3.17 – Socio-Economics

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
Property Values	RR-003, RR-012, RR-017, RR-018, RR-023, RR-025, RR-026, RR-027, RR-036, RR-038, RR-051, RR-055, RR-056, RR-059, RR-060, RR-061, RR-066, RR-068, RR-075, RR-080, RR-081, RR-083, RR-090, RR-096, RR-103, RR-104, RR-107, RR-109, RR-110, RR-127, RR-142, RR-145, RR-148, RR-163, RR-167, RR-170, RR-174, RR-176, RR-179, RR-180, RR-182, RR-186, RR-187, RR-190, RR-191, RR-192, RR-194, RR-198, RR-199, RR-200, RR-206, RR-207, RR-208, RR-209, RR-212, RR-213, RR-214, RR-215, RR-221, RR-231, RR-234, RR-236, RR-241, RR-243, RR-246, RR-248, RR-249, RR-251, RR-252, RR-254, RR-255, RR-256, RR-259, RR-262, RR-275, RR-292, RR-294, RR-296, RR-300, RR-305, RR-311, RR-312, RR-313, RR-323, RR-328, RR-333, RR-347, RR-350, RR-351, AS-004	*Concerns have been expressed about decreasing property prices, particularly highlighting the potential depreciation of property value due to the proximity to a large industrial estate. Additionally, issues have been raised regarding the depreciation of property values specifically related to the nearby solar farm, with an expected loss of around £55,000 in house value. There are also broader concerns about property value depreciation and the risk of potential negative equity.*	The Applicant is not aware of any empirical evidence to suggest that the presence of solar farms affects nearby property values. In any event, property value is not a material planning consideration.
Health and Wellbeing	RR-002, RR-006, RR-009, RR-012, RR-031, RR-049, RR-055, RR-070, RR-071, RR-099, RR-100, RR-101, RR-102, RR-103, RR-113, RR-121, RR-125, RR-131, RR-137, RR-139, RR-157, RR-160, RR-161, RR-162, RR-164, RR-179, RR-181, RR-186, RR-189, RR-193, RR-196, RR-	*Concerns have been expressed about the impact of the Proposed Development on health and wellbeing, citing insufficient research on the long-term health impacts of living near a large solar farm. There are worries about potential effects on residents' mental and physical health, with a concerns*	A technical note has been prepared as part of the Application to provide information regarding the potential effects to human health of the Proposed Development. The Population and Human Health Technical Note **[APP-118]** concluded that there are no significant beneficial or adverse effects identified during construction or decommissioning in relation

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
	203, RR-204, RR-213, RR-223, RR-227, RR-244, RR-247, RR-253, RR-271, RR-273, RR-276, RR-285, RR-301, RR-306, RR-308, RR-319, RR-328, RR-334, RR-339, RR-340, RR-342, RR-344, RR-349	*specifically highlighting risks to children from machinery and electrical charges, which could cause anxiety and stress. Additionally, issues have been raised that the presence of solar panels and batteries may lead to long-term health impacts on families. There is a general unhappiness and stress in the community regarding the plans, with concerns about a decline in mental health due to the loss of natural surroundings.*	to population and human health. No significant adverse effects have been identified during operation, significant beneficial effects in relation to population and human health have been identified in the form offset carbon emissions and the production of renewable energy.
Human Rights	RR-044, RR-229, RR-256, RR-258, RR-288	*Concerns have been raised about slavery in the production of solar PV, specifically pointing to the potential use of slave labour in manufacturing and trust issues with Helios solar farm ownership. There are also worries about the true cost of clean energy and its manufacturing impact, including child labour in Africa. Additionally, there are concerns about the ethical procurement of materials and human rights issues, as well as the responsible sourcing of panels from China and the lack of social audits.*	Prior to procurement of components the Applicant will undertake full supply chain audits to ensure that components are appropriately sourced.. The Employment and Skills Plan **[APP-170]** outlines the objectives of the Applicant to deliver opportunities for employment and the development of skills throughout the 12-month construction phase at the Proposed Development.
Local Amenity	RR-001, RR-010, RR-012, RR-016, RR-033, RR-041, RR-045, RR-058, RR-059, RR-061, RR-067, RR-073, RR-083, RR-088, RR-089, RR-136, RR-175, RR-178, RR-183, RR-185, RR-201, RR-205, RR-207, RR-210, RR-001, RR-045, RR-048, RR-062, RR-078, RR-096, RR-097, RR-128, RR-133, RR-138, RR-140, RR-146,	*Concerns have been expressed about the impact on local amenities, such as public rights of way and bridleways, and the overall character of the village. They highlight that the impact on public footpaths and permissive bridleways will reduce the quality of life and force horse riders onto the main road. There are worries about the*	Effects on local amenity during the construction phase from noise and traffic will be negligible to minor adverse in light of the technical assessments presented in Chapters 10 Transport and Access **[APP-030]** and 11 Noise and Vibration **[APP-031]** of the ES. Visual effects on local amenity are anticipated to be moderate negative (but not significant), immediately adjacent to the Site.

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
	RR-195, RR-225, RR-237, RR-250, RR-270, RR-298, RR-307, RR-215, RR-216, RR-217, RR-219, RR-227, RR-238, RR-240, RR-248, RR-255, RR-279, RR-284, RR-294, RR-321, RR-332, RR-347, RR-349	*reduction in quality of life and the overall appeal of the community due to the industrial nature of the Proposed Development. There are concerns that the villages of Camblesforth, Carlton, and Drax already suffer from the blight, traffic, and overshadow of Drax Power Station, and adding to this is viewed as criminal and vandalism. Uncertainty has been expressed that the Proposed Development is incompatible with the village setting, affecting its appeal and potentially reducing property values. Additionally, there are concerns about the spoiled outlook affecting recreational activities like walking, biking, horse riding, and dog walking, as well as the loss of areas for these activities and changes to the outlook from homes.* *Concerns have been expressed about the local impacts of the solar farm, including insufficient research and investigation into its effects on the village and its residents. There are worries that historic villages will be nearly surrounded by solar panels, negatively impacting residents and commuters. Concerns mention that the Proposed Development will be within 5 meters of their property, posing a threat to the long-established way of life in Camblesforth.*	However, negative visual effects rapidly diminish with distance from the Site and therefore within the Local Study Area there is not considered to be any likely significant negative effects on local amenity. The proposed solar panels would be set back from properties within Camblesforth as shown on ES figure 3.2 Parameter Plan [APP-040]. The closest element of the Project to residential properties in Camblesforth is the underground cable corridor which aligns with the highway.

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
Local Economy	RR-001, RR-045, RR-048, RR-062, RR-078, RR-096, RR-097, RR-128, RR-133, RR-138, RR-140, RR-146, RR-195, RR-225, RR-237, RR-250, RR-270, RR-298, RR-307	*Concerns have been expressed about the Proposed Development's impact on tourism, wedding venues, and the financial viability of other local destinations. There are worries about the negative impact on tourism, particularly the Pennine Trail, and property prices. There are concerns about the adverse impacts on the wedding venue at Camblesforth Hall. Additionally, concerns express that Proposed Development could lead to a loss of jobs for land workers, factory workers, and those in the farming equipment industries, as well as a decline in skilled farm workers, which could negatively affect the quality of life for residents. There are also concerns about the lack of employment created by the Proposed Development. However, some suggest that the potential for households to sell excess energy back to the grid could improve local income during a cost-of-living crisis.*	Direct on-site construction jobs will be necessary for land preparation, installation, and grid connection, creating employment opportunities across various occupations and skill levels. The Applicant aims to prioritise sourcing labour locally wherever feasible. Baseline conditions indicate that the Wider Study Area has a resident workforce with diverse skills, occupations, and industries capable of meeting this demand. Impacts to local amenity (including tourism) were considered as part of the assessment and no significant effects were identified.
Crime	RR-142, RR-152, RR-201, RR-201, RR-251, RR-273	*Concerns have been expressed about the impact of crime on the solar farm, fearing that the Proposed Development will attract criminal activity and increase the risk of theft and vandalism. There are also worries about vandalism, theft, and terrorism affecting the solar farm. Additionally, there are concerns that the Proposed*	Crime is discussed within the Population and Human Health Technical Note **[APP-118]** Landscaping will be used to create a pleasant space, and the use of fencing and CCTV, will ensure the creation of a space in which crime and anti-social behaviour is discouraged. Effects to community safety are therefore not considered to be significant. The Landscape Strategy uses screening planting to minimise the visual impact of

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
		Development could lead to an increased risk of crime in the area.	the Proposed Development on visual receptors including the users of PRoW, within the Site and those with visual links to the Site. In some instances, screening planting has not been provided alongside PRoW to maintain a degree of openness within and/ or across the Site.
Community Benefit	RR-019, RR-037, RR-091, RR-154, RR-165, RR-186, RR-230, RR-239, RR-263	*Concerns have been expressed about the inconvenience for local residents during construction and the lack of reduction in electricity bills for taxpayers. There are worries about the potential lowering of property values, making the community less attractive, and the unclear direct benefits to the local community from the generated energy. There are concerns that the negatives far outweigh the benefits for the local people, changing the area for the worse with no real benefit for the community. There is a belief that the Proposed Development will not provide sufficient benefit to outweigh the harm to the local community.*	The Applicant is open to providing community benefits, however, this is not a material planning consideration so will be progressed should the DCO be granted.

3.19. Transport and Access

Table 3.18 – Transport and Access

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
Construction Traffic Impact on Residents	RR-002, RR-036, RR-044, RR-099, RR-103, RR-107, RR-110, RR-130, RR-164, RR-206, RR-208, RR-136, RR-163, RR-178, RR-182, RR-209, RR-212, RR-226, RR-248, RR-249, RR-259, RR-283, RR-288, RR-292	*3.18.1. Concerns have been expressed about the impact of construction traffic on residents, highlighting the increase in traffic with over 50 HGV deliveries daily during the three-year construction period. This is expected to cause congestion, increased air pollution, and road safety issues. There are worries about pollution and disruption from large lorries, as well as the increased HGV and LGV traffic on single-track roads, which could affect equestrians, cyclists, and walkers. Additionally, there are concerns that the closing of public access to walks around Camblesforth and the significant impact of additional traffic through small villages will reduce safety.*	Environmental Statement Chapter 10 - Transport and Access **[APP-030]** and the oCTMP **[AS-006] a**ssess and manage these concerns. The local roads which comprise the construction and decommissioning vehicle routes to the Site have been studied to assess the impact on the following criteria, road user and pedestrian safety, severance of communities, road vehicle driver and passenger delay, non-motorised delay (incorporating delay to all non-motorised users), non-motorised user amenity, fear and intimidation and hazardous loads/ large loads. These criteria are in accordance with IEMA guidance. The chapter notes that construction traffic impacts on residents will be minimal and short-term. However, areas such as Jowland Winn Lane and Hardenshaw Lane, with low baseline traffic levels, may experience more noticeable increases. To address this, a comprehensive Construction Traffic Management Plan (CTMP) will be implemented (secured by Requirement 6 of the dDCO), including measures to schedule vehicle movements outside peak hours and utilise existing access points to minimise disruption. Furthermore, public rights of way will remain open and unaffected, ensuring minimal inconvenience to the local community.
Construction Traffic Impact on Roads	RR-003, RR-004, RR-012, RR-014, RR-017, RR-020, RR-027, RR-030, RR-038, RR-041, RR-050, RR-054, RR-055, RR-057, RR-061, RR-067, RR-068, RR-069, RR-	*Concerns have been expressed about the impact of construction traffic on roads and road users, including congestion and safety issues. There are worries that the roads are inappropriate for the*	

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
	073, RR-090, RR-093, RR-102, RR-105, RR-131, RR-134, RR-137, RR-141, RR-142, RR-146, RR-147, RR-148, RR-153, RR-154, RR-157, RR-175, RR-176, RR-181, RR-189, RR-190, RR-192, RR-193, RR-201, RR-202, RR-207, RR-210, RR-213, RR-214, RR-215, RR-232, RR-243, RR-244, RR-247, RR-256, RR-264, RR-271, RR-273, RR-276, RR-282, RR-284, RR-285, RR-298, RR-299, RR-307, RR-317, RR-321, RR-324, RR-331, RR-332, RR-339, RR-341, RR-347, RR-350	*types and amount of traffic expected. Issues with access routes and increased traffic on already busy and accident-prone roads have been highlighted, with the speed of vehicles already being a problem. Additionally, there are concerns about increased traffic and vibration from construction vehicles, with an estimated 30-40 heavy loads per day. The impact of thousands of construction vehicles on narrow country lanes is also a concern, as local roads are not fit for the level of construction traffic required.*	
Public Rights of Way	RR-003, RR-060, RR-075, RR-167, RR-176, RR-187, RR-196, RR-233, RR-234, RR-253, RR-300	*Concerns have been raised that the Proposed Development may restrict residents' ability to walk their dogs on public rights of way, forcing them to travel elsewhere. There are worries about the loss of footpaths and walking areas for exercising horses and dogs, as well as concerns about the continuation of public rights of way. Additionally, there are concerns about the increased danger for walkers and*	Existing Public Rights of Way (PRoWs) have been identified within Environmental Statement Chapter 10 - Transport and Access **[APP-030]** and the Transport Assessment **[AS-005]**. Paragraph 10.5.58 of Chapter 10 states that PRoWs that cross the Site will generally remain open during the construction phase of the Proposed Development. There may be the requirement for some very temporary diversions of PRoWs where they cross cable corridors. This will only be required when the cable is being installed . If temporary diversions of a PRoW are required , they will be appropriately managed in consultation with the local highway authority. Management measures for PRoWs are set out in the oCTMP **[AS-006]** and summarised in Section 8 of the

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
		horse riders due to the loss of paths and bridleways is a significant issue.	Transport Assessment **[AS-005]**. A Public Rights of Way Management Plan will be implemented, which will be secured by Requirement 12 of the DCO.
Cumulative Impact	RR-024, RR-100, RR-152, RR-312, RR-320	*Concerns have been raised about the increase in vehicle traffic through surrounding villages due to the proposed Helios site, which would add to the existing business and HGV traffic from Drax Power Station. There are worries about the huge impact on traffic due to various local projects, exacerbating the current situation.*	As set out in section 10.9 of Environmental Statement Chapter 10 - Transport and Access **[APP-030]**, several cumulative schemes that may be in effect during the construction of the Proposed Development and these were assessed for the future baseline year 2027. In total, six cumulative schemes would have an effect on the study area, affecting the M62, A614, A645 and the A1041. All roads are considered A-roads, apart from the M62, and as a number of the schemes had relatively low daily movement numbers, it was predicted that the cumulative schemes would result in the same residual effects for the construction of the Proposed Development. As such, depending on the effect, these were either negligible or minor adverse and all not significant. This was the same for the operational and decommissioning phases.

3.20. Water Environment

Table 3.19 – Water Environment

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
Flood Risk	RR-002, RR-003, RR-008, RR-012, RR-014, RR-017, RR-019, RR-028, RR-044, RR-049, RR-055, RR-057, RR-061, RR-067, RR-068, RR-073, RR-076, RR-078, RR-092, RR-100, RR-102, RR-103, RR-105, RR-127, RR-136, RR-137, RR-138, RR-139, RR-140, RR-146, RR-153, RR-162, RR-164, RR-194, RR-209, RR-210, RR-212, RR-220, RR-224, RR-232, RR-244, RR-246, RR-247, RR-255, RR-256, RR-273, RR-283, RR-285, RR-286, RR-300, RR-313, RR-320, RR-331, RR-333, RR-339, RR-347, RR-351	*Concerns have been raised that the Proposed Development will increase the risk of flooding due to soil compaction and runoff from the panels. Additionally, there are concerns that flood risk would be heightened due to climate change. There are also worries that the Proposed Development, particularly the BESS, is located in flood zones 2 and 3, which could exacerbate existing risks and impact drainage.*	The issue of flooding is discussed in Environmental Statement Chapter 9 - Water Environment **[APP-029]** and Flood Risk Assessment **[APP-232]**. The Proposed Development will have a negligible effect on the extent of impermeable ground cover on the Site. The area beneath the solar PV panels will remain grassed. Rainwater falling onto each panel will drain freely onto the ground beneath the panel and infiltrate into the ground at the same rate as it does in the Site's existing greenfield state. Similarly, it can be assumed that any rainwater falling onto the crushed stone access tracks will soak into the ground beneath or adjacent to the tracks at the same rate that it presently does. The FRA states at paragraph 5.8 that soil compaction is limited during construction, operation, and decommissioning of solar farm developments. During construction, only light machinery is required to install the solar arrays and vehicle movements would be minimised. Low ground pressure vehicles are recommended during wet weather working. Any HGVs are usually restricted to a temporary construction compound near the Site's entrance. The majority of operational vehicle movements would be restricted to onsite access tracks to minimise the risk of soil compaction. These measures are set out in the Outline Soil Management Plan **[APP-173]** and will be refined in a detailed Soil Management Plan to be secured by DCO requirement. Proposed adaptation measures aim to ensure robust climate resilience from the outset, including the construction of an earth

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
			flood defence bund around the Substation and BESS Compound. This bund is designed to protect these facilities while mitigating flood risks. During the fluvial "credible maximum scenario sensitivity test" flood event, the bund could effectively displace floodwaters, providing an additional safeguard against potential flooding impacts.
Water Contamination	RR-002, RR-017, RR-055, RR-107, RR-112, RR-125, RR-147, RR-154, RR-190, RR-193, RR-201, RR-215, RR-237, RR-253, RR-276, RR-284	*Concerns have been expressed that the Proposed Development may lead to water contamination due to potential issues such as BESS fires, construction activities, and the use of concrete. There are specific worries about the Source Protection Zone and the Nitrate Vulnerable Zone, given that the site is located above a principal aquifer within the source protection zone. Issues have been raised about potential groundwater contamination from construction activities, and others are worried about the possible pollution of the water table from battery storage.*	The potential impact on the Source Protection Zone (SPZ) is addressed in Environmental Statement Chapter 9 - Water Environment **[APP-029]**. Mitigation measures outlined in this chapter and the oCEMP **[APP-121]** include regular monitoring of groundwater quality to detect contamination early. Additionally, all electrical equipment containing oil will be appropriately bunded in line with best practice guidance to prevent pollution during construction and decommissioning activities. Further information regarding Groundwater Source Protection is discussed from section 3.42 to 3.54 of the FRA Flood Risk Assessment **[APP-232]**. Only solar arrays and security fencing extend into SPZ1 (approximately 0.212 Ha of the Site). The supporting frames have a minimal cross-sectional area and would be 'pile driven' or 'screw anchored' into the ground to a typical depth of 1.5-2.5m below ground level, depending on ground condition surveys to be completed prior to construction activities commencing. At the detailed design stage, the risk of piling causing physical disturbance or creating a potential pathway for contamination to the underling aquifer or SPZ1 would be assessed. If required, a Piling Risk Assessment will be secured by DCO requirement requiring details to be submitted to and approved by the Local Planning Authority.

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
			Due to the nature of the Proposed Development, measures proposed in the oCEMP **[APP-121]** and detailed site design it is considered that no new pathways would be created for pollutants to groundwater during the operation, construction or decommissioning of the Proposed Development. The Proposed Development would not pose a significant risk to groundwater resources and groundwater quality and complies with the terms of the EA's Groundwater Protection Policy.
Flood Risk Assessment	RR-001	*Concerns have been expressed about the insufficient information and consideration given to flood risk in the Proposed Development plans. They point out a lack of detailed information regarding the mitigation of flood risk and its potential impact on the surrounding areas.*	A detailed Flood Risk Assessment (FRA) **[APP-232]** has been undertaken and included within the Application. The FRA provides sufficient flood risk information to support the DCO application. The FRA has been updated following comments received from statutory consultees in relation to the Preliminary Environmental Information Report ('PEIR') stage of the DCO application and results of the site-specific flood modelling. The FRA demonstrates that the Proposed Development would be appropriately safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where practicable, would reduce flood risk overall. Paragraphs 4.106 to 4.160 propose design flood mitigation and adaption measures.

3.21. Other Matters

Table 3.20 – Other Matters

Sub Theme	Relevant Representations References	Summary of Comments	Applicant's Response
Impact on Phones, Broadband, TV	RR-002, RR-012, RR-107, RR-244	*Concerns have been raised about the Proposed Development's potential impact on phones, broadband, and TVs, as these are already unreliable in the area, and fear that the Proposed Development could cause further disruptions. There is also concern about the potential negative impact on mobile and internet devices due to the Proposed Development.*	The Applicant is not aware of any empirical evidence to suggest that the installation of a solar farm could interfere with equipment such as mobile phones, TV reception or broadband.