EAST YORKSHIRE SOLAR FARM

East Yorkshire Solar Farm

EN010143

Applicant's Responses to Relevant Representations

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1. Introduction

1.1 Purpose of this document

1.1.1 The purpose of this report is to provide East Yorkshire Solar Farm Limited's (the Applicant) response to the key issues raised in relevant representations submitted by Interested Parties in relation to the East Yorkshire Solar Farm (EYSF) (the Scheme).

1.1.2 The Development Consent Order (DCO) application (the Application) for East Yorkshire Solar Farm was submitted on 21 November 2023 and accepted for Examination on 19 December 2023. The period when Interested Parties (IPs) could submit Relevant Representations (RR) on the Application was from 25 January 2024 to 8 March 2024. The RRs received were published on the Planning Inspectorate's project website on 22 March 2024.

1.1.3 A total of 377 responses were received during the RR period. On the 8 May 2024, the ExA accepted additional responses from National Grid Electricity Transmission, Northern Gas Networks and The Coal Authority. These consultees were not registered with a RR reference number; therefore the examination library reference number has been used when referring to these responses within this document.

1.2 Structure of this document

1.2.1 This report provides a response from the Applicant to the matters raised in the relevant representations and is structured as follows:

a. **Tables 2-1 to 2-16: Statutory Consultees**: the Applicant's responses to relevant representations from Statutory Consultees, who are listed in Table 1-1 below.

b. **Table 2-17: Local Authorities:** the Applicant's responses to relevant representations from Local Authorities, who are listed in Table 1-2 below.

c. **Table 2-18: Parish Councils**: the Applicant's responses to relevant representations from Parish Councils, who are listed in Table 1-3 below.

d. **Table 2-19: Non-Statutory Organisations**: the Applicant's responses to relevant representations from Non-Statutory Organisations, who are listed in Table 1-4 below.

e. **Table 2-20: Persons with an Interest in the Land:** the Applicant's responses to relevant representations from Persons with Interest in the Land, who are listed in Table 1-5 below.

f. **Tables 2-21 to 2-39: Public**: the Applicant's responses to relevant representations from the Public, organised into themes.

1.2.2 RRs received by Statutory Consultees, Local Authorities, Parish Councils, Non Statutory Organisations and Persons with an Interest in the Land are presented as verbatim text taken from Relevant Representations, and are then responded to by setting out the Applicant's position on the matter at the time of writing.

1.2.3 To increase the conciseness of this document similar points from the Public have been grouped together and summarised. The reference number

column in the tables below refers to the reference given to the RRs in the Examination Library, aside from National Grid Electricity Transmission, Northern Gas Networks and The Coal Authority, where the examination reference has been used.

1.2.4 The documents submitted with the Application are also referenced in this document, using the reference number [APP/x.y], where the last two/three numbers are the application document number, as set out in the Examination Library. All documents are also presented in numerical order in the Guide to the Application **[AS-002]**.

Table 1-1. List of Statutory Consultees who submitted Relevant Representations

RR/Examination Reference Number	Prescribed Consultee
Statutory Consultees	
RR-266	Natural England
AS-020	Northern Gas Networks
RR-107	Environment Agency
RR-270	Network Rail
RR-369	UK Health Security Agency
RR-146	Historic England
RR-114	National Gas Transmission
RR-036	Canal and River Trust
RR-283	North Yorkshire Fire and Rescue
RR-288	Ouse and Derwent Drainage Board
RR-118	Forestry Commission
RR-287	Ouse and Derwent Internal Drainage Board
RR-284	Northern PowerGrid (Yorkshire) Plc
RR-265	National Highways
AS-022	National Grid Electricity Transmission Plc
AS-021	The Coal Authority

Table 1-2. List of Local Authorities who submitted Relevant Representations

Local Authorities	
RR-089	East Riding of Yorkshire Council
RR-282	North Yorkshire Council
RR-208	Leeds City Council
RR-149	Hull City Council

Table 1-3. List of Parish Councils who submitted Relevant Representations

Parish Councils	
RR-117	Foggathorpe Parish Council
RR-341	Spaldington Parish Council
RR-148	Howden Town Council

Table 1-4. List of Non Statutory Organizations who submitted Relevant Representations

RR/Examination Reference Number	Non Statutory Organisations Consultee
Non-Statutory Organisations	
RR-370	UK Solar Alliance
RR-377	Yorkshire Wildlife Trust
RR-088	East Riding of Yorkshire and Kingston upon Hull Joint Local Access Forum
RR-310	Ramblers Association- East Yorkshire & Derwent Branch

Table 1-5. List of Persons with an Interest in the Land who submitted Relevant Representations

RR/Examination Reference Number	Persons with Interest in the Land
RR-133	Graham Falkingham
RR-229	Matthew Axup
RR-059	Colin Wilburn
RR-322	Robin Wilburn
RR-320	Robert Falkingham
RR-090	EBS Renewables Ltd (EBS Renewables Ltd)
RR-087	E. Blenkhorn & Son (E. Blenkhorn & Son)
RR-061	D B Hunt & Co (D B Hunt & Co) on behalf of D B Hunt & Co
RR-162	Janice Beaumont-Hayes
RR-207	Lawrence Beaumont-Hayes
RR-376	William John Haywood
RR-169	Joan Mary Lunn
RR-082	Donald Breach
RR-071	David Fielder
RR-349	Stephen Paul Lunn
RR-001	Adrian Mallinson
RR-101	Elizabeth Hayes
RR-100	Elizabeth Breach
RR-363	Terry Hayes
RR-182	John Yorke

RR-290	Paul Adrian Joseph Taylor
RR-139	Heather Longbottom
RR-102	Elizabeth Jane Shutt
RR-016	Angie Yorke
RR-293	Paul Dignan
RR-006	Alex Moon
RR-199	Kath Westin
RR-247	Walton & Co (Walton & Co) on behalf of Mr Paul Taylor and Mrs Alison Taylor
RR-134	Guy Bramley
RR-135	Guy Longbottom
RR-007	Alison Taylor

1.2.5 For ease of reference, a table of acronyms used in this document is provided in **Table 1-6** of this document.

Table 1-6. Abbreviations

Abbreviation	Definition
AA	Appropriate Assessment
AIA	Arboricultural Impact Assessment
AIL	Abnormal Indivisible Loads
AD	Anaerobic Digestion
ALC	Agricultural Land Classification
ATC	Automatic Traffic Counts
BEGA	Bilateral Embedded Generation Agreement
BMV	Best and Most Versatile Land
BNG	Biodiversity Net Gain
BPM	Best Practicable Means
CAT	Cable Avoidance Tool
CEMP	Construction Environmental Management Plan
CCTV	Closed Circuit Television
CTMP	Construction Traffic Management Plan
DAS	Design and Access Statement
DBA	Desk Based Assessment
DCO	Development Consent Order
DEMP	Demolition Environmental Management Plan
EA	Environment Agency
EIA	Ecological Impact Assessment
ERYC	East Riding of Yorkshire Council
ES	Environmental Statement
EMR	Electromagnetic Radiation
EMP	Electro Magnetic Fields
EYSF	East Yorkshire Solar Farm

Abbreviation	Definition
FRA	Flood Risk Assessment
FLL	Functionally Linked Land
GW	Gigawatt
ha	Hectares
HEYLEP	Hull and East Yorkshire Local Enterprise Partnership
HDD	Horizontal Directional Drilling
HGV	Heavy Goods Vehicle
HRA	Habitats Regulation Assessment
IDB	Independent Drainage Board
INNS	Invasive Non-Native Species
IPs	Interested Parties
IR	Infrared
JLAF	Hull Joint Local Access Forum
LEMP	Landscape and Ecological management Plan
LHA	Local Highway Authority
LIR	Local Impact Report
LOAEL	Lowest Observed Adverse Effect Level
LVIA	Land and Visual Impact Assessment
LWS	Local Wildlife Site
MW	Megawatt
NGET	National Grid Electricity Transmission Plc
NGT	National Gas Transmission
NPPF	National Planning Policy Framework
NPS	National Policy Statement
NSIP	Nationally Significant Infrastructure Project
OEMP	Operational Environmental Management Plan
PA	Planning Act 2008
PEI	Preliminary Environmental Information
PINS	Planning Inspectorate
PROW	Public Right of Way
PV	Photovoltaic
RPA	Root Protection Area
RR	Relevant Representation
SAC	Special Area of Conservation
SMP	Soil Management Plan
SoCG	Statement of Common Ground
SRN	Strategic Road Network
SPA	Special Protection Area
SSCEP	Skills, Supply Chain and Employment Plan
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Drainage Systems
TMMS	Traffic Management and Monitoring System

Abbreviation	Definition
UKSA	UK Solar Alliance
WR	Written Representation
WMP	Waste Management Plan

2. Applicant's Responses to Relevant Representations

2.1 Statutory Consultees

Natural England

Table 2-1. Applicant's Responses to Relevant Representations – Natural England

RR Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
RR-266	**NE1- Potential loss of functionally linked land (FLL) for the relevant qualifying bird features of the listed SPA / Ramsar sites.** Habitats Regulations Assessment (HRA) comments: SPAs are classified for rare and vulnerable birds. Many of these sites are designated for mobile species that may also rely on areas outside of the site boundary (referred to as 'functionally linked land' (FLL)). These supporting habitats may be used by SPA bird populations or some individuals of the population for some or all of the time. These supporting habitats can play an essential role in maintaining SPA species populations, and proposals affecting them may therefore have the potential to affect the designated site. Natural England concur with 6.3.2 of the Stage 1 screening assessment of the HRA, that likely significant effects (LSE) on the Humber Estuary SPA / Ramsar and Lower Derwent Valley SPA / Ramsar cannot be ruled out, due to the potential loss of FLL during construction and operation for passage/wintering bird species associated with these sites. As stated in 6.3.2: "*The Order limits are approximately 1.3km from the Lower Derwent Valley SPA/Ramsar and 3km from the Humber Estuary SPA/Ramsar, placing it within the core foraging ranges for some of the qualifying species*." Section 8.4 of the appropriate assessment (AA) further assesses potential loss of FLL for both the Humber Estuary SPA / Ramsar and Lower Derwent Valley SPA / Ramsar. To conclude that LSE cannot be ruled out, and to inform the appropriate assessment (AA), the Applicant has carried out a desk-based study (including a records search), and wintering bird surveys (2022/2023) within the Survey Report for Non-Breeding Birds (Volume 2, Appendix 8-6) [APP089]. The results of the surveys demonstrate peak counts within Order limits of 100 greylag geese, 80 pink-footed geese, and 51 lapwing. The peak count of pink-footed goose was recorded in Field 1a of the solar photovoltaic (PV) area. Winter wheat was planted at the time of the survey, and soils are described as "*Slowly permeable, seasonally waterlogged".* The peak count of golden plover was recorded in field 3b of the solar PV area, with cropping data demonstrating that winter wheat and oil seed rape were planted at time of the survey, with soils also described as "*slowly permeable, seasonally waterlogged".* Following our previous advice, we welcome the inclusion of the cropping data, with 8.4.9 noting that: "*2022/2023 did not represent an unusual or 'less suitable'*	The Applicant can confirm that the 1% population threshold has not been applied rigidly when determining functionally linked land nor for apportioning requirements for mitigation. The regularity of occurrence and inter-annual variation in site usage has been considered along with other. No metrics such as the assemblage of qualifying species recorded and availability of suitable habitats for qualifying species. The 2023/24 non-breeding bird survey data collected by the Applicant have been provided to Natural England and will be included in the HRA submitted during examination. These data support the conclusions presented in the HRA, illustrating that the occurrence of designated site qualifying species is opportunistic and variable, being dependant, in part, on the cropping pattern in any given year. Furthermore, the observations of qualifying species within the Solar PV areas across the two years of survey confirm irregular usage by significant numbers of individuals considered to be associated with designated sites, i.e., in exceedance of 1% of the designated site population. Therefore, the data from the non-breeding bird surveys in 2023/24 confirm that the overall area identified for habitat offsetting for golden plover and pink footed goose (109ha in total within which 28.75ha of golden plover habitat will be maintained and 15ha for pink footed goose in any year) is sufficient to deliver necessary mitigation habitat.

RR Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
	year for non-breeding birds in terms of its cropping pattern (see Table 13)". This also notes that the cropping forecast predicts this was due to also apply to 2023/2024. We welcome that this data has been provided and used to inform the conclusion that the Site could support significant numbers of pink-footed goose and golden plover, and "…*constitute functionally linked habitat*" based on "…*the 1% population threshold*". We note however that this remains deemed a "…*precautionary measure*". As advised in our S42 response, the 1% threshold is only one metric, and therefore it is not always appropriate to apply it strictly when assessing FLL. We consider, based on all evidence provided, that parts of the application Site are likely functionally linked, despite numbers not necessarily reaching a 1% threshold. We note that the peak count of greylag goose is 5.6% of the Humber Estuary population, with impacts on greylag geese associated with this designated site ruled out in section 8.4.8 of the HRA. However, we have previously confirmed agreement with the justifications provided in the HRA for why greylags should not be the drivers of mitigation, as detailed in paragraph 8.4.13. We have also noted previously that the mitigation to be provided for pink footed goose is also likely to provide some suitable habitat for greylag goose. Section 8.4.10 rules out impacts on little egret and mallard associated with the Humber Estuary, as the Site lies beyond the "*core foraging ranges*" reported for these species. We have previously concurred with the reasoning provided, and agree it is unlikely that those found in these surveys are linked with the Humber Estuary population. We advised in our S42 response that as the land has been identified as having potential suitability as FLL, the survey results should be considered at appropriate assessment stage, and if the development is demonstrated to lead to loss of functionally linked land for designated bird species, then the suitability of proposed mitigation should also be assessed in the HRA. We confirm that the results have been considered at the correct stage and agree that mitigation measures are required for loss of FLL. However, we advise that full conclusions cannot yet be drawn until we have sight of the 2023/2024 wintering bird survey results (please refer to below section entitled 'Previous survey advice and additional survey effort 2023/2024'). We are also unable to provide full comments on the proposed mitigation area for this reason, however, please refer to the column to the right for general comments.	
RR-266	**NE1- Potential loss of functionally linked land (FLL) for the relevant qualifying bird features of the listed SPA / Ramsar sites.** <u>Previous survey advice and additional survey effort 2023/2024</u> Natural England have previously provided advice on the 2022/2023 wintering bird surveys (summarised in Table 12 of the shadow HRA) carried out by the Applicant, throughout the pre-application process through our Discretionary Advice Service (DAS), and within our Section 42 response (dated 16 June 2023).	The Applicant has provided the 2023/24 non-breeding bird survey data to Natural England and this data is now included in an updated version of the Habitats Regulation Assessment) (HRA (submitted to PINS during examination). The data illustrate how opportunistic and variable field use is for most species, with numbers exceeding 1% of the SPA population only being recorded occasionally within the Solar PV areas during the two years of survey. The data also confirm that the overall area identified for habitat offsetting for golden plover and pink footed goose (109ha in total within which 28.75ha of golden plover habitat will be maintained and 15ha for pink footed goose in any year) is sufficient to deliver necessary mitigation habitat.

RR Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
	We noted in our advice provided through DAS that two years' worth of surveys would provide a more robust understanding of the bird use on site and better inform the HRA. This advice was provided for the following reasons: • There are limitations in the survey methodology and frequency used in the 2022/2023 surveys. • The proposed development has a very large footprint, and therefore has potential for a significant loss of land in proximity to both Humber Estuary and Lower Derwent Valley. • To help with determination of suitable design and extent of mitigation for loss of functionally linked land, based on potential year on year variation of bird use. We have been informed by the Applicant that an additional year of wintering bird surveys is now underway, following the above advice. We welcome this additional survey effort. However, as the additional bird survey data for the 2023/2024 passage/wintering period will not be submitted until after the relevant representation deadline, our advice in relation to FLL is currently limited to the results of the 2022/2023 surveys only and is therefore incomplete. We would like to also reiterate previous advice in that vantage point surveys should be undertaken when assessing whether a development site may constitute functionally linked land for wintering and passage birds. We note that this is the preferred methodology as it prevents flushing of birds which may occur when transect surveys are undertaken. In addition, if the redline boundary of the development is altered throughout the examination, then we advise that the suitability of new fields to act as FLL would need to be assessed. Including undertaking surveys of wintering and passage birds where there is determined to be potential suitability.	As discussed in Appendix D of the updated HRA (submitted to PINS during examination), the non-breeding bird surveys undertaken in 2023/24 were based on an adapted walkover transect methodology (following boundary features to minimise disturbance to birds in arable fields) and incorporating regular pre-determined stopping points in a manner similar to vantage point surveys. This adapted methodology allowed surveyors to locate and observe target bird species, recording behaviour in a manner similar to Vantage Point surveys, whilst reflecting the practicalities of surveying a large site (with many features that limit views from a static position) and avoiding the flushing of birds. As the Applicant has set out in previous correspondence with Natural England, this hybrid approach allows efficient coverage of the entirety of the survey area (Order limits and 300 m buffer), minimising disturbance whilst allowing observation of target bird species presence, abundance, and behaviour. The Applicant notes the comments regarding the need to reassess the suitability of new fields to act as FLL and the potential need for new survey work should the Applicant wish to amend the Order limits during the examination. This is not currently planned.
RR-266	**NE1- Potential loss of functionally linked land (FLL) for the relevant qualifying bird features of the listed SPA / Ramsar sites.** **Natural England comment on the mechanism for securing mitigation / compensation measures in the DCO.** Natural England advises that the comments provided below on the proposed mitigation measures for loss of FLL cannot yet be finalised. The Applicant is currently carrying out an additional year of wintering bird surveys following advice we provided during the pre-application stage. As the full additional bird survey data for the 2023/2024 passage/wintering period will not be submitted until after the relevant representations deadline, we cannot comment on whether the mitigation measures detailed in the HRA / framework Landscape and Ecological Management Plan (LEMP) [APP-246] (termed "Ecology Mitigation Area" and detailed from 6.1.72 to 6.1.86 in this document) will be sufficient to avoid adverse effects on integrity of the Humber Estuary SPA / Ramsar and the Lower Derwent Valley SPA / Ramsar. Therefore, detailed advice on the proposed mitigation	The Applicant has provided the 2023/24 non-breeding bird survey data to Natural England and these are now included in the HRA (submitted to PINS during examination). The data illustrate how opportunistic and variable field use is for most species, with numbers exceeding 1% of the SPA population only being recorded occasionally within the PV areas during the two years of survey. The data also confirm that the overall area identified for habitat offsetting for golden plover and pink footed goose (The Ecology Mitigation Area which is 109ha in total within which the full 28.75ha of golden plover habitat will be maintained and 15ha for pink footed goose in any year) is sufficient to deliver necessary habitat. These requirements for habitat mitigation can be delivered within the allocated mitigation zones for both species, with no changes to the habitat types required. The Framework LEMP has been updated to reflect the need for the entirety of the golden plover zone to be managed annually for the species (submitted to PINS as part of Deadline 1). The Framework LEMP has also been updated to confirm that the Ecology Mitigation Area and the management of habitat within this will be established prior to commencement of construction works and will be maintained for the lifetime of the Scheme until the commencement of decommissioning as defined by Schedule 2 requirement 18 of the Draft DCO **[AS-008].** The Applicant is submitting the updated Framework LEMP at examination Deadline 1.

RR Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
	measures will follow later in the Examination period, including more specific advice around the size, carrying capacity, habitat management, and any remediation measures. Subject to the Applicant submitting the additional surveys (and any required updates to the HRA / LEMP as a result) in sufficient time, we will aim to include this detailed advice at the Written Representations deadline. Please refer to the below sections for our initial comments on the mitigation measures. <u>General comments on mitigation measures for loss of FLL</u> Section 8.4.12 of the HRA appropriate assessment (AA) concludes that "…mitigation will be needed to offset the loss of functionally linked habitat associated with the Scheme". Natural England agree that mitigation measures will need to be provided to avoid adverse effects on integrity of the Humber Estuary SPA / Ramsar and Lower Derwent Valley SPA / Ramsar. We note that mitigation requirements are to be delivered "as a package" due to both sites falling within the Zone of Influence (ZoI) of the scheme. We can confirm that we agree with this approach. As above, although we are unable to make full comments on the sufficiency of the mitigation measures at present, we can advise on the following principles: • We advise that the final version of the LEMP (following any updates required throughout Examination) is secured within the DCO. • As detailed in 8.4.17 of the HRA, we advise that habitat must be established prior to commencement of construction works in the closest parts of the Scheme. We advise this is also specifically secured within the DCO. • We advise that the mitigation area is secured in-perpetuity, and at least for the lifetime of the development. We agree with detail included in 8.4.15 of the HRA around limiting surrounding hedgerows and woodland, along with roads and built-up areas, to facilitate long-distance views for birds and reduce disturbance. We advise that to ensure this is the case, an undeveloped / undisturbed 150m buffer around the mitigation area is secured. We also note in the conclusions section of this part of the HRA (8.4.29), it is stated that "*This proposal has been discussed with and agreed to in principle by Natural England.*" We note that we have engaged with the Applicant pre-application and have agreed with some aspects, such as the habitat types, however, we are unable to provide full agreement until we see the results of the 2023/2024 wintering bird surveys, and any subsequent required changes to the mitigation design.	The Applicant notes that NE agree with the approach to mitigation requirements for the potential loss of functionally linked land (FLL) for the relevant qualifying bird features of the Humber Estuary SPA/ Ramsar; and Lower Derwent Valley SPA/ Ramsar being delivered "as a package" due to both sites falling within the Zone of Influence (ZoI) of the Scheme, as set out in the HRA **[APP-244].**
RR-266	**NE2- Noise and visual disturbance during construction to FLL for the relevant qualifying bird features of the listed SPA / Ramsar sites.**	With regard to noise, an updated version of Figure 6 of the HRA has been produced and will be submitted during examination, with the bird data overlain. This has been shared with Natural England.

RR Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
	Potential noise and visual disturbance during construction is taken through to the appropriate assessment stage, due to LSE on FLL, with the following noted in 6.2.2 of the HRA (screening stage): "The Site comprises extensive tracts of agricultural land, which lie within the maximum foraging ranges of some of the qualifying species in the Lower Derwent Valley SPA/Ramsar and Humber Estuary SPA/Ramsar". We agree with these impact pathways being taken through to the appropriate assessment stage (section 8.1). However, we are unable to concur with the conclusion of no adverse effects on integrity at present. Please refer to the below sections for further detail. <u>Noise disturbance</u> The appropriate assessment provides further detail around noise disturbance in sections 8.1.1 to 8.1.11. It is concluded in 8.1.19 that there will be no adverse effects on the integrity on the listed designated sites from noise disturbance on functionally linked habitats. Having considered the assessment it is our advice that it is not possible to ascertain that the proposal will not result in adverse effects on the integrity of the sites in question. The assessment does not currently provide enough information and/or certainty to justify the assessment conclusion, and further assessment / consideration of mitigation options is required. We advise that the following additional information and / or amendments are required: Natural England does not support the use of IECS 2013 'Waterbird disturbance mitigation toolkit' as we do not consider the evidence to have been collected in a rigorous way, and the results have not been peer reviewed. Therefore, any assessment that relies on the toolkit may be inaccurate. Section 8.1.3 refers to the IECS 2013 toolkit, in relation to setting a disturbance distance for bird species. • We note that 8.1.3 concludes that a noise disturbance distance / zone of 200m is proposed (based on the IECS 2013 toolkit). However, we advocate a precautionary approach to assessing disturbance to birds, using a 300m as an initial disturbance zone and then reducing this where mitigation measures allow. • We welcome the inclusion of Figure 6 in the HRA which demonstrates modelled LAeq construction noise contours across the site, and how noise is predicted to attenuate. Based on the information provided in this Figure, and in the Noise and Vibration assessment (Volume 1, Chapter 11, Table 11-4. Sensitive receptors) [APP-063] and the Baseline Noise Survey (Volume 2, Appendix 11-3, results section) [APP-106], it appears that construction noise will result in potentially significant exceedances of the recorded baseline levels (these range from 43-58dB), at many of the receptor points.	Although Natural England has suggested mapping the use of tracked excavators and their duration would be useful, these are a constantly moving source of noise rather than fixed and will be used throughout construction. It is therefore not possible to comprehensively map their locations but for the noise assessment presented in the HRA the use of excavators at the edges of the fields has been modelled as the worst-case. As part of the updated HRA which will be submitted during examination the applicant has: a. Removed reference to the waterbird disturbance mitigation toolkit. The applicant did not rely on the distances in the toolkit so this does not materially change the impact assessment. b. Deleted reference to 200m as a general distance for noise disturbance. The Applicant haven't relied on the 200m for the noise assessment, instead using bespoke modelling at the AA stage. Therefore, this does not change the assessment. A reference to 300m as a screening distance for disturbance effects is in paragraph 8.1.39. The Applicant notes Natural England wish to consider the updated maps before forming a view on whether they agree with the Applicant's conclusion of no adverse effect on integrity without the need for mitigation. The Applicant's view remains that specific noise mitigation (other than as already committed for some HDD) should not be required given: a. the opportunistic nature of bird use of the affected fields. This indicates that the birds are not particularly wedded to specific fields but rather use fields throughout the large functionally-linked land zone around the SPAs as and when it is available and suitable, moving to other fields if a given field is unsuitable at a particular time. b. The fields surrounding the PV area would be subject to comparable disturbance through normal farming operations in adjacent land (e.g. farm machinery ploughing, fertilising, spraying and harvesting) or go temporarily out of suitability (e.g. being put fallow, or having their crop changed) as part of routine farming use of the landscape. c. The opportunistic use of these fields surrounding the PV area indicates that it would be difficult to identity where noise fencing (for example) would need to be located as the birds are only present on some occasions and absent on others, and this is not predictable.

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	Despite the potential suitability of adjacent arable fields to the site as habitat for SPA / Ramsar birds, Figure 6 does not yet put exceedances into context of the birds present or utilising the area, or provide detail about timings of works / type of works planned at any given time. For instance, it is noted in 8.1.5 that tracked excavators will be used in construction and are associated with the highest sound pressure at source (LAmax of 89dB at 10m). As these are required for several construction / decommissioning activities, mapping the timings, and anticipated time lengths of these works, would be useful. We note that section 8.1.7 states that noise is anticipated to "decay to acceptable levels" within 400m. Additionally, section 8.1.8 provides various justifications around the reasons that areas with higher construction noise levels will not cause disturbance, including field size and existing built-up areas. However, we require the above information to further determine if noise levels are likely to be disturbing to SPA / Ramsar birds. We advise that the further information would be best provided through provision of an overlay map containing the above detail, to help determine which birds are likely to be impacted by increased noise during construction. Considering the above, we note there is no discussion around possible mitigation options for noise disturbance, despite potentially significant increases in comparison to background noise levels. Further assessment of how mitigation might reduce noise impacts, including measures such noise fencing, is required. • As detailed for the NE1 section, we note that additional wintering bird surveys (2023/2024) are in the process of being completed. We advise that these results could also affect the outcome of the noise assessment and should also be considered in this context once available. Although the above information is outstanding, we advise that construction noise impacts to the proposed FLL mitigation area can be ruled out, subject to the mitigation measures being secured prior to the commencement of construction works for the main application site. Please refer to NE1 for our full comments in relation to mitigation measures for loss of FLL.	
	NE2- Noise and visual disturbance during construction to FLL for the relevant qualifying bird features of the listed SPA / Ramsar sites. <u>Visual disturbance</u> The appropriate assessment further assesses visual disturbance in sections 8.1.12 to 8.1.18. As per our comments above, the IECS 2013 Toolkit is referenced in relation to setting a buffer for visual disturbance. Please refer to our comments above around the use of this toolkit. However, we advise that a 300m buffer for visual disturbance is likely sufficient. It is then concluded in 8.1.19 that there will be no adverse effects on the integrity on the listed designated sites from visual disturbance on functionally linked	The Applicant notes Natural England agrees with the assessment of visual disturbance during construction.

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	habitats. In relation to visual disturbance only (refer to comments above in relation to the further information required for noise disturbance), based on the information provided, Natural England agree with this conclusion, subject to appropriate mitigation being secured. Please refer to the column to the right for further detail. **Natural England comment on the mechanism for securing mitigation / compensation measures in the DCO.** As stated above for NE1, we advise that the mitigation area is secured prior to commencement of construction works.	
RR-266	**NE3- Operational impacts (visual disturbance) to FLL for the relevant qualifying bird features of the listed SPA / Ramsar sites.** Sections 6.3.3 to 6.3.8 of the HRA (screening stage) assess operational impacts, primarily potential visual disturbance to birds using FLL. Section 6.3.9 then concludes the following: "*Overall, there will be no LSEs of the Scheme regarding visual disturbance impacts in the operational phase, including obstruction of flight movements, disturbance displacement, from maintenance activities and glint and glare. Therefore, this impact pathway is screened out from AA*." Based on the information provided (summarised below), Natural England agree with this conclusion. However, we advise that this pathway is considered in-combination (please refer to key issue NE9). The assessment provided includes the following details: • Discussions around the height of the development, which will be lower than current landscape features such as hedgerows, trees, and woodland (6.3.3) • Detail of potential visual disturbance by operational maintenance staff, which is anticipated to include only three permanent on-site maintenance staff, and occasional ad-hoc visitors, carrying out maintenance works including "…*vegetation management, equipment maintenance and periodic repair works*". This is considered no more disturbing than current farming practices (6.3.4) • Impacts on SPA / Ramsar birds resulting from glint and glare impacts are ruled out in 6.3.5 to 6.3.8 due to the solar PV technology contains built in mechanisms to reduce reflectivity, stating the following: "*Given that reflection from the solar PV panels will be minimal due to the technology utilised, will further reduce any glint and glare effects on overflying birds*." It is also noted that any exposure time from possible glint and glare is unlikely to result in impacts due to the following: "…it is considered that qualifying birds are likely to transit through the landscape surrounding the Scheme on a broad front, as there are no topographical and geographical features that would concentrate bird movements in particular corridors."	The Applicant notes Natural England agrees with the assessment of visual disturbance during operation.

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	We note that the Applicant has also completed a Glint and Glare Assessment (Appendix 16-3, ES Volume 2) [APP-122], which they note corroborates the above conclusions.	
RR-266	**NE4- Potential water quality impacts during construction** Natural England notes the provision of a number of Horizontal Directional Drilling (HDD)-related water quality measures, which we advise must be included within the Construction Environmental Management Plan (CEMP) [APP-238] to prevent ecological impacts occurring via this impact pathway. Point 9.3.1 of the HRA states that '*As identified in the AA, comprehensive water quality protection measures are secured in the Framework CEMP EN010143/APP/7.7], including the adherence to Good Practice Guidance, use of temporary drainage systems, minimum distances between storage spaces for excavated materials and water features, and dedicated wash-down areas*.' In addition to these measures, contingency plans must be place for potential 'frac-out' events. Natural England advises that these measures should be detailed in the final CEMP.	The water quality mitigation requirements with regard to the use of HDD are outlined in Table 4 of the Framework CEMP **[APP-238]**. This includes requirements for site specific groundwater risk assessment prior to commencing work, application of suitable buffers around watercourses and flood defences, the need for Hydraulic Fracture (frac-out) Risk Assessment that would include contingency measures in event of frac-out, monitoring of the drilling path, and use of water based drilling fluids. These measures would be expanded upon in the detailed CEMP to be produced by the Contractor post-consent as specified in the Framework CEMP **[APP-238]**, and thus secured by requirement in Schedule 2 of the draft DCO **[AS-008]**.
RR-266	**NE4- Potential water quality impacts during construction** Natural England welcome the commitment to delivering a water management plan in Table 4, page 45 of the framework CEMP - '*The Water Management Plan (WMP) (to be delivered post consent secured through the CEMP) will include details of pre, during and post construction water quality monitoring'*.	The comment regarding the WMP is noted. The WMP will be an appendix to the detailed CEMP, as secured by requirement in Schedule 2 of the draft DCO **[AS-008]**.
RR-266	**NE4- Potential water quality impacts during construction** Natural England notes that section 6.3.14 of the HRA clarifies that the solar PV panels will be cleaned with water, therefore screening this impact pathway out from AA. Natural England concurs with this conclusion. **Natural England comment on the mechanism for securing mitigation / compensation measures in the DCO**. All water quality mitigation measures relating to HDD should be included in the CEMP and secured in the DCO. The inclusion of the water management plan within the CEMP should be secured within the DCO.	The comment regarding the impact from cleaning panels with water is noted. No cleaning products would be used as specified in Section 2.6 of the Framework Operational Management Plan (Framework OEMP) **[APP-239]**. A detailed OEMP (which will need to substantially accord with the Framework OEMP) will be submitted post consent prior to operation which is secured by requirement in Schedule 2 of the draft DCO **[AS-008]**.
RR-266	**NE5- Potential impacts to otter (*Lutra lutra*) during construction, including horizontal directional drilling (HDD)** Natural England welcomes the inclusion of a buffer for HDD to minimise disturbance to SAC species, though notes inconsistencies with the distance of buffering used between different documents. It must be ensured that HDD buffering distances are standardised across documents (30m for the River Derwent, River Ouse, and Watercourse DE53; 10m for all other watercourses). See examples below:	The quoted text regarding HDD buffering distances are consistent. The general buffering distance will be 10m from the bank top except for the River Derwent, River Ouse and watercourse DE53. These distances will be secured within the CEMP, along with noise mitigation and timing of the works. NE has asked for further information as to why DE52, DE03, and OU24 have not been considered for HDD rather than open trenching methods. They also suggest the Applicant considers noise fencing for OU20, OU24 and OU13. These watercourses are all identified in surveys as suitable for dispersal only, rather than for resting places or holts. DE53, River Ouse and River Derwent were assessed as having potential for more than dispersal. In addition, as stated no evidence of use by otter was found in these additional watercourses, only along DE53, River Ouse and River Derwent. Since the crossing

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	Chapter 8, page 169 'of Environmental Statement – "*The Scheme incorporates minimum 10m standoff buffers from watercourses/ditches (bank top). This buffer is extended to a minimum of 30m for the River Derwent, River Ouse, and Watercourse DE53".* 9.3.2 of HRA – "*Potential negative water quality impacts from HDD operations are minimised by delivering precautionary drill depth, undertaking preworks hydrogeological assessments (including a site-specific hydraulic fracture risk assessment) and distancing HDD pits a minimum of 30 m from the edge of watercourses'*. Page 63 of Framework CEMP – "*The sections of the cables that will be installed via trenchless approaches will require launch and reception pits to be installed at each crossing point. These are identified in Figure 9-3, ES Volume 3 [EN010143/APP/6.3]. The send and receive pit excavations for drilling/boring will be located at least 10 m from the watercourse edge, as measured from the top of bank*". We have based our advice on the understanding that the 30m buffer will be utilised to prevent impacts to the River Derwent SAC, and the CEMP (and all other documents) should be consistent in the reflection of this. Natural England welcomes HDD as a means of mitigating impacts on waterways in which there could potentially be otter presence. However, further information should be provided as to why DE52, DE03, and OU24 have not been considered for HDD rather than open trenching methods. Each of these waterways has been scoped in for suitability as otter habitat (as stated in the Riparian Mammal Survey Report [APP-093]) and will be directly crossed by the grid connection corridor, resulting in significant disturbance. Natural England notes that the Riparian Mammal Survey Report states that DE52, DE03, and OU24 have not been deemed as suitable for otter as the River Ouse, the River Derwent, and DE53 - nor have they displayed evidence of otter presence. Given the suitability of these habitats for otter, and proximity to waterways in which otter have been recorded, Natural England advises that further justification should be provided as to why HDD is not necessary for crossing these habitats with a view to minimising any adverse effect on otter. Natural England notes the screening in of 'noise and visual disturbance in the construction period' on the Lower Derwent Valley SAC and River Derwent SAC. Natural England welcomes this conclusion and the mitigation proposed of the use of noise barriers around HDD send and receive pits to mitigate for noise impacts on otter. Due to the suitability of OU20, OU24, and OU13 for otter, Natural England advises that noise barriers should be used to avoid disturbance of these waterways during any adjacent construction phase activities. Point 11.7.16 of the Environmental Statement states that 'it should be noted that this identification of a likely significant effect is precautionary as it is expected that HDD activities outside of the daytime period would only be required if there is a	works will be short-term (typically several days day) and will typically be undertaken mainly during the day (whereas otter generally move at night), no need for HDD or noise fencing as mitigation exists. The Applicant notes the need to secure buffers for HDD activities in relation to specific watercourses. These are discussed in Tables 3 and 4 of the Framework CEMP and have been updated to provide further clarity. This confirms there will be a 30 m buffer to prevent impacts to the River Derwent SAC. The Framework CEMP has also been updated at Table 3 to include the need for details regarding where HDD is to occur in relation to SAC boundaries to be detailed in the detailed CEMP, following completion of the Hydraulic Fracture Risk Assessment. Noise mitigation measures are detailed in the Framework CEMP at Table 7 and reference to temporary noise mitigation fencing for otter is detailed at page 44 of Table 3 and paragraph 2.5.2 in the Framework CEMP. The Applicant is submitting the updated Framework CEMP at examination Deadline 1.

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	clear and obvious benefit'. Natural England concurs that generally nighttime working, in particularly with regard to HDD, should be minimised and only occur in instances when 24/hour working is unavoidable, to avoid disturbance to the nocturnal activities of otter. **Natural England comment on the mechanism for securing mitigation / compensation measures in the DCO.** The buffers which are to be used for HDD in relation to specific watercourses should be established within the CEMP. Specific details regarding where HDD is to occur in relation to SAC boundaries should also be detailed in the CEMP, following completion of the Hydraulic Fracture Risk Assessment. These measures should be secured within the DCO. All noise mitigation measures relating to, for instance, HDD and the timing of works, should be included in the CEMP and secured in the DCO.	
RR-266	**NE6- Potential impacts to river lamprey, sea lamprey (River Derwent SAC; and Humber Estuary SAC); and bullhead (River Derwent SAC) during construction, including noise disturbance.** Both river lamprey (Lampetra fluviatilis) and sea lamprey (Petromyzon marinus) are designated fish features of the River Derwent SAC, along with bullhead (Cottus gobio). Additionally, the Humber Estuary SAC features include river lamprey and sea lamprey, with migratory routes (FLL for lamprey) extending from the estuary into various adjoining watercourses, including the Derwent and the Ouse. As noted above, the project intends to cross the river Derwent and the river Ouse using HDD methods, and potential impacts on the fish features of the above designated sites are assessed at the HRA screening stage in 6.2.3, 6.2.5 and 6.2.6. Section 6.2.7 then rules out LSE on the qualifying fish features of the River Derwent SAC and Humber Estuary SAC in both the construction and decommissioning phase. On the basis of the information provided, Natural England advises that there is currently not enough information to rule out the likelihood of significant effects. We advise that the following additional information and / or amendments are required: • The River Derwent SAC bullhead (Cottus gobio) feature is not assessed within this section. We advise that impacts on this feature are also assessed, as they will not necessarily be the same as for lamprey. • The HRA notes in 6.2.6 that there will not be any works within the river, as "*trenchless technologies (i.e., HDD) will be used for crossing the Featherbed Drain, River Derwent and River Ouse*". It is also noted in 6.2.6 that the cables will be 5m below the bed of both the River Ouse and River Derwent, with the send	Bullhead are most at risk of impacts during their spawning periods (February to June). There is currently limited species-specific information available on how they react to noise and vibrational disturbances. On this basis a precautionary approach would be taken and HDD activities beneath the River Ouse and River Derwent will avoid the core fish migration season of September to February and May where practicable . Sensitivity of bullhead is now further discussed in paragraph 6.2.5 of the updated HRA shared with NE. Both bullhead and the lamprey species are of low sensitivity to vibration impacts other than those arising within the water column since they lack swim bladders. Moreover, with the HDD 30m back from the banks and 5m deep there will be a large volume (c. 1500m^3) of substrate and rock between the HDD and the river laterally and approximately 1000m^3 above the drill. This will provide considerable damping and the duration of the drill is short being approximately several days. Nonetheless, the HRA has been updated and will be submitted during examination to include reference to the seasonal restriction already mentioned in the ES chapter. This reinforces a conclusion of no adverse effect on integrity. Furthermore, as set out in the Framework CEMP **[APP-238]**, HDD operations beneath the River Ouse and River Derwent will avoid the core fish migration season of September to February and May where practicable. In line with case law precedence, seasonal restrictions of construction works do not constitute mitigation and can be taken into account at the Screening stage. The HRA has been updated in relation to this impact pathway and will be submitted during examination.

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	and receive pits at a minimum of 30m from the edge of the watercourse. We welcome confirmation of distance buffers to be used, however, we advise that further justification is required as to whether these distances will allow noise/vibration from HDD to attenuate to acceptable levels for the relevant fish species. • Detail is also provided around the migration timings for the lamprey species in 6.2.5, noting the following: "*The return of reproductively active river lamprey to upstream spawning migrations occurs between October and December, whereas upstream movement of sea lamprey takes place in April and May*". However, there is currently no comparison made with migration periods and the timings of any potentially disturbing works. There is also no detail of how long any of the most disturbing works are anticipated to last. • We note however that the following is presented in Table 8 – 12 (pg183) of 6.1 Chapter 8 – Ecology [APP-060]: "*The core fish migration season of September to February and May will be avoided for HDD beneath the River Ouse and River Derwent, unless the depth of the HDD is confirmed to be of a sufficient minimum distance of approximately 10m below the riverbed to avoid noise and vibration effects*". This information is not included in the HRA in relation to the River Derwent SAC. Further justification around whether these measures are sufficient should be provided, including consideration around whether these are mitigation measures (and therefore should be included at the appropriate assessment stage).	
RR-266	**NE7- Potential physical damage to River Derwent SAC habitat during construction** We note that section 6.2.25 states: "…*temporary access into the field to the north in the form of a bell mouth would require the temporary removal of a section of verge habitat within the designated site boundary*." We agree with the conclusion that is then made in 6.2.26 of the HRA; that LSE on the River Derwent SAC cannot be ruled out due to the potential for temporary loss / damage to habitat during vegetation clearance required for temporary access. Section 8.5.2 of the HRA notes that the access track does not impact the habitat feature "'*water courses of plain to montane levels with the Ranunculion fluitantis and Callitricho-Batrachion vegetation*", as this habitat is aquatic and not dependent directly on the terrestrial vegetation in this location. It is then stated that "*The vegetation that would be temporarily removed is considered to be part of the wider site fabric, which is not essential for the SAC to achieve its Conservation Objectives*." However, as the vegetated banks are supporting habitat for designated otter, we advise that there is potential for adverse effect on integrity, if the habitat is not fully restored. Therefore, the HRA must state that a restoration plan for the removed vegetation will be undertaken, and this restoration plan must be developed prior to commencement of development. We also note that page 61 of the Framework CEMP states 'a site-specific Hydraulic Fracture Risk Assessment would be developed prior to construction following further investigation of specific ground conditions at the crossing	The Applicant wishes to clarify that the affected area is not part of the watercourse banks but comprises a grass verge and is essentially path-side verge on the southern boundary of the field. In addition, the Phase 1 otter survey recorded no evidence of otter along ditch DE21 in any event. Notwithstanding this, the affected area of vegetation will be restored following works. A separate habitat restoration plan for the area impacted by vegetation removal is not anticipated to be necessary, however details of how the verge habitat will be restored are now included within the Framework LEMP, to be submitted at Deadline 1. This includes measures undertaken to reinstate full ecological functionality to this area of habitat within the River Derwent SAC. The Applicant notes the need to secure buffers for HDD activities in relation to specific watercourses. These are discussed in Tables 3 and 4 of the Framework CEMP and have been updated to provide further clarity regarding buffer distances. This confirms there will be a 30 m buffer to prevent impacts to the River Derwent SAC. The Framework CEMP has also been updated to include the need for details regarding where HDD is to occur in relation to SAC boundaries to be presented in the detailed CEMP, following completion of the Hydraulic Fracture Risk Assessment. The updated CEMP will be submitted to PINS at Deadline 1.

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	locations, and appropriate mitigation developed in line with best construction practice'. Natural England welcomes the inclusion of HFRA prior to commencement of HDD. However, we advise that if there is potential for use of an alternate water crossing methodology, in the case of HDD being unviable, Natural England advise that the impacts are also assessed upfront. **Natural England comment on the mechanism for securing mitigation / compensation measures in the DCO.** The restoration plan for the removed vegetation within the River Derwent SAC must be secured within the DCO. The plan could be included within the final LEMP. The buffers which are to be used for HDD in relation to specific watercourses should be established within the CEMP. Specific details regarding where HDD is to occur in relation to SAC should be included within the CEMP and secured within the DCO.	
RR-266	**NE8- Potential damage to SAC habitats from construction dust.** We agree with the conclusions given in 6.2.34 of the HRA that LSE cannot be ruled out for potential impacts of dust deposition during the construction or decommissioning phases for the River Derwent SAC. This notes the following: "*In the absence of mitigation measures, any construction or decommissioning activities carried out within 200m of the SAC, particularly those requiring earthworks and the use of construction materials, may result in increased dust deposition to floating aquatic vegetation (e.g., water crowfoot Ranunculion fluitantis) and the water column*." At the appropriate assessment stage, we note that in 8.3.2, it is stated that: *"Many of the measures included in the CEMP will be effective in minimising dust release. For example, the following good practice guidelines such as Guidance for Pollution Prevention (GPP), CIRIA documents and British Standards Institute (BSI) documents will be adhered to, which will contribute towards minimising the release of dust from construction activities*:" We also note that the framework CEMP contains detail around dust control measures, particularly in Table 12 – Air Quality. This also references the creation of a Dust Management Plan prior to construction. With the above measures secured, Natural England agree with the conclusion given in 8.3.4, that there will not be adverse effects on the integrity of the River Derwent SAC resulting from dust deposition. However, we advise that this conclusion is based on the project alone. Please refer to the below section [NE9] relating to the further assessment required for in-combination impacts. **Natural England comment on the mechanism for securing mitigation / compensation measures in the DCO.**	The Applicant notes Natural England agrees with the conclusions of the HRA on impacts to SAC habitats from construction dust. The dust mitigation requirements are set out in Table 12 of the Framework CEMP **[APP-238]**. Table 12 also states that prior to construction a Dust Management Plan will be developed and implemented. This is secured via the detailed CEMP which is a requirement in Schedule 2 of the draft DCO **[AS-008]**. It is considered that the mitigation measures to be delivered and secured in the CEMP will entirely avoid adverse dust impacts resulting from the Scheme and, therefore, any potential for in-combination effects with other developments. The HRA has been updated and will be submitted during examination, which provides further explanation of the 'in combination' decisions made.

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	All dust mitigation measures included in the CEMP should be secured in the DCO. The inclusion of a dust management plan as referenced in the CEMP should be secured within the DCO.	
RR-266	**NE9- Potential in combination impacts on international designated sites** We advise that the developments scoped in for potential impacts in-combination in Table 10 is comprehensive, in terms of inclusion of the correct types of development. However, the current HRA does not provide a sufficient in-combination assessment, which requires further details to address the outstanding issues. We advise that the HRA should identify where impacts have been fully avoided through mitigation and where there is still a potential residual impact that could act in combination (i.e. loss of openness on functionally linked land due to multiple developments). This assessment should consider the residual effects of developments together. If mitigation or compensation has completely avoided or removed the effect that this would not act in combination with other projects. Natural England will review the assessment in more detail after further information is provided about impacts (and associated mitigation) as detailed above. Further in-combination assessment is therefore required for the following identified impact pathways: • Impacts to FLL, including loss of openness in the landscape, and noise / visual disturbance (Humber Estuary SPA / Ramsar and Lower Derwent Valley SPA / Ramsar) • Noise impacts to any designated sites if there is potential for timing overlap during construction. • Water quality (River Derwent SAC) • Atmospheric pollution (dust) (River Derwent SAC) Please refer to the sections below for any specific in-combination comments on specific designated sites/impact pathways.	The HRA has been updated and provided to NE, which provides further explanation of the 'in combination' decisions made. Further in-combination assessment is provided in relation to • Impacts to FLL, including loss of openness in the landscape, and noise / visual disturbance (Section 8.1). • Noise impacts to any designated sites if there is potential for timing overlap during construction (Section 8.1). • Water quality (Section 8.2). Atmospheric pollution (dust) (Section 8.3).
RR-266	**NE9- Potential in combination impacts on international designated sites** <u>River Derwent SAC</u> *Temporary habitat loss in-combination* Section 8.5.4 of the HRA notes that although several NSIPs overlap with the Grid Connection Corridor, it is considered there will be no in-combination impacts from temporary habitat loss to the River Derwent SAC, due to the localised nature of the impact. This also notes the following: "*Specifically, no other project will require vegetation removal in this location and over the same timescale as the Scheme*". Based on this information provided, it is therefore likely that impacts can be ruled out in-combination. However, please refer to our advice around River Derwent	The Applicant notes Natural England agrees with the conclusion of the HRA on this matter.

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	SAC habitat loss for further information about impacts alone, and the restoration plan required [NE7].	
RR-266	**NE10- Potential air quality impacts from traffic emissions during construction on relevant designated sites alone or in-combination with other plans and / or projects.** Section 6.2.13 of the HRA rules out LSE of traffic emissions for the project alone. The reasoning provided for this is that HGV movements will not exceed 50 per day, and that "…*a preliminary assessment of the proposed routing of HGVs (also known as the 'Affected Road Network' [ARN]) indicates that none of the routes lie within 200m of any European site*." Based on this information, that none of the affected routes are within 200m of any designated site, we advise that impacts can therefore be ruled out alone or in-combination.	The Applicant notes that NE agree with the conclusions of section 6.2.13 of the HRA **[APP-244]** which rules out LSE of traffic emissions for the project alone and in-combination, because HGV movements will not exceed 50 per day, and that "…a preliminary assessment of the proposed routing of HGVs (also known as the 'Affected Road Network' [ARN]) indicates that none of the routes lie within 200m of any European site."
	NE11- The potential effects of the introduction and spread of non-native species during construction on qualifying habitats. We note that invasive non-native species (INNS) have been screened out from impacts, as the biosecurity measures will be carried out, irrespective of the presence of designated sites. We agree this is an acceptable approach but would advise the measures are reiterated in the final CEMP for the development. **Natural England comment on the mechanism for securing mitigation / compensation measures in the DCO.** We advise the INNS biosecurity measures should be included within the final CEMP and secured within Schedule 2, no 11 of the DCO.	The Applicant notes that NE agree with the approach taken to mitigating the potential effects of the introduction and spread of non-native species during construction on qualifying habitats which are addressed in the Framework CEMP **[APP-238].** Requirement 11 of the draft DCO **[AS-008]** requires the submission of a construction environmental management plan, which must be substantially in accordance with the Framework CEMP **[APP-238],** which will need to be submitted and approved by the Local Planning Authority in consultation with Natural England prior to commencement of the development.
RR-266	**NE12- Potential impacts on Skipwith Common SAC, Thorne and Hatfield Moors SPA, and Thorne Moor SAC** Natural England notes the information included in the HRA (4.2.7) in relation to these designated sites and agree that they can be screened out of further assessment.	The Applicant notes that NE agree that Skipwith Common SAC, Thorne and Hatfield Moors SPA, and Thorne Moor SAC designated sites can be screened out of further assessment.
RR-266	**NE13- Potential impacts on Humber Estuary SSSI designated features** Our advice regarding impacts on the Humber Estuary SSSI coincides with our advice regarding the potential impacts upon the Humber Estuary SPA / Ramsar, as detailed above.	Please refer to responses to the advice for Humber Estuary SPA / Ramsar, as detailed above for NE1-4.
RR-266	**NE14- Potential impacts on Breighton Meadows SSSI and Derwent Ings SSSI designated features**	Please refer to responses to the advice for Lower Derwent Valley SPA / Ramsar, as detailed above for NE1-4.

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	Our advice regarding impacts on Breighton Meadows SSSI and Derwent Ings SSSI coincide with our advice regarding the potential impacts upon the Lower Derwent Valley SPA / Ramsar, as detailed above.	
RR-266	**NE15- Potential impacts on River Derwent SSSI designated features** Our advice regarding impacts on the River Derwent SSSI coincides with our advice regarding the potential impacts upon the River Derwent SAC, as detailed above. However, for features which do not overlap, please refer to the below sections [NE16] [NE17] [NE18].	Please refer to responses to the advice for River Derwent SAC, as detailed above for NE5-8.
RR-266	**NE16- Potential impacts on the River Derwent SSSI dragonfly assemblage during construction** Natural England notes the screening in of construction, operational, and decommissioning water quality impacts on the River Derwent SSSI dragonfly assemblage. The water quality measures detailed above in key issue ref NE4 are also proposed to mitigate impacts to the habitat utilised by the dragonfly assemblage. Natural England concurs with this proposed mitigation. **Natural England comment on the mechanism for securing mitigation / compensation measures in the DCO.** Water quality mitigation measures should be included within the CEMP, and secured within the DCO in Schedule 2, requirement 11. We note that Schedule 2, requirement 9 includes a statement that any foul water drainage plan must be submitted to the relevant planning authority prior to development. We advise that if the Foul water plan is changed at a later stage, and will no longer be removed from site for treatment, then impacts to designated sites from discharges will need to be addressed.	The applicant notes Natural England agrees with the conclusions of the mitigation on this matter. The water quality mitigation measures outlined in Chapter 9 Flood Risk, Drainage and Water Environment, ES Volume 1 **[APP-061]**, as referred to in comment NE4, are secured in the DCO via Table 4 of the Framework CEMP **[APP-238].** The detailed CEMP will need to be substantially in accordance with the Framework CEMP as per Schedule 2, requirement 11 of the draft DCO **[AS-008]**. The comment regarding a foul water drainage plan is noted. As outlined in Chapter 9 Flood Risk, Drainage and Water Environment, ES Volume 1 **[APP-061]**, foul water from the operations and maintenance hub at Johnson's Farm and from the operations building at the Grid Connection Substations will be drained to a septic tank which will be emptied regularly under contract with a registered recycling and waste management contractor. This will be captured in the foul water drainage plan, which is secured via requirement 9 of the DCO Schedule 2 and must be in accordance with the Framework Surface Water Drainage Strategy **[APP-098]**. The Framework Surface Water Drainage Strategy **[APP-098]** confirms that foul water will go to a septic tank and removed for treatment. In the very unlikely event that this changed, the Applicant would have to agree amended details with the relevant planning authority and demonstrate there are no materially new or materially different environmental effects under Requirement 3(2), or make an application to amend the DCO. In both circumstances any associated impacts to designated sites would be considered.
RR-266	**NE17- Potential impacts on River Derwent SSSI bird assemblages during construction** We advise that it is currently unclear from the information provided in 6.1 Chapter 8 – Ecology [APP-060] whether there has been any direct assessment on the 'Assemblages of breeding birds' and 'Aggregations of non-breeding birds - Bewick's Swan, *Cygnus columbianus bewickii*' features of the River Derwent SSSI. These features do not overlap with those of the River Derwent SAC. We therefore advise that further information is provided in relation to potential construction phase impacts on these features. Please refer to the River Derwent SSSI Designated Sites View page for further details, including the SSSI citation.	In addition to the assessment of effects such as habitat loss and injury to species associated with the SSSI, where distance and crossing methods are stated, the effect on associated species as a result of *Disturbance to cited species (as detailed in Table 8 6) through noise/lighting/ visual disturbance* is assessed on page 188-190 of Chapter 8: Ecology, ES Volume 1 **[APP-060]**. This includes the following text; *Any disturbance to cited bird species from works associated with the installation of the Grid Connection Cable will be temporary and localised to a very narrow area of the SSSI. Consequently, the potential for significant effects to individual species (see Table 8-1 for cited bird features) or the SSSI assemblage to arise is unlikely.*

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RR-266	**NE18- Potential impacts on the River Derwent SSSI fish assemblage during construction** We advise that it is currently unclear from the information provided in 6.1 Chapter 8 – Ecology [APP-060] whether there has been any direct assessment on the River Derwent SSSI 'Outstanding assemblage of native fish' feature. Aspects of this feature do not overlap with the River Derwent SAC designated fish features. As detailed in [NE6], we note that the following is presented in Table 8 – 12 (pg183) of 6.1 Chapter 8 – Ecology [APP-060] in relation to mitigation of noise/vibration impacts from HDD: "*The core fish migration season of September to February and May will be avoided for HDD beneath the River Ouse and River Derwent, unless the depth of the HDD is confirmed to be of a sufficient minimum distance of approximately 10m below the riverbed to avoid noise and vibration effects*". We advise that further justification is provided around why this is considered sufficient to mitigation impacts for the species within the SSSI assemblage. We therefore advise that further information is provided in relation to potential construction phase impacts on these features. Please refer to the River Derwent SSSI Designated Sites View page for further details, including the SSSI citation.	In addition to the assessment of effects such as habitat loss and injury to species associated with the SSSI, where distance and crossing methods are stated, the effect on associated species as a result of *Disturbance to cited species (as detailed in Table 8 6) through noise/lighting/ visual disturbance* is assessed on page 188-190 of Chapter 8: Ecology, ES Volume 1 **[APP-060]**. This includes the following text; *Works will be programmed to ensure that the HDD will avoid the key fish migration seasons as stated for the River Derwent SAC above, unless the depth of the HDD is confirmed to be of a sufficient distance below the riverbed to avoid noise and vibration effects.* Whilst the 'outstanding assemblage of native fish feature' was not directly referenced, the River Derwent SSSI was still considered in the assessment. Protected species within the SSSI, bullhead and lamprey sp are of the lowest sensitivity group of fishes to vibration since they lack swim bladders. Moreover, with the HDD 30m back from the banks and 5m deep there will be a large volume (c. 1500m^3) of substrate and rock between the HDD and the river laterally and approximately 1000m^3 above the drill. This will provide considerable damping and the duration of the drill is short duration, being approximately several days.
RR-266	**NE19- Potential water quality impacts during construction** Natural England have previously advised that further information was required regarding potential water quality and water supply impacts on Barn Hill Meadows SSSI. Page 191 of the Environmental Statement states that '*surface water drainage will incorporate suitable quality controls to mitigate impacts to surrounding watercourses. Foul water will be collected and removed from Site for treatment. Standard environmental protection measures ... will minimise indirect impacts on existing habitats in these sites due to runoff during construction or other waterborne pollution'*. Natural England welcomes the inclusion of these measures. All mitigation measures proposed during construction should be secured in the final CEMP. **Natural England comment on the mechanism for securing mitigation / compensation measures in the DCO.** Water quality mitigation measures should be included within the CEMP, and secured within the DCO in Schedule 2, requirement 11. We note that Schedule 2, requirement 9 includes a statement that any foul water drainage plan must be submitted to the relevant planning authority prior to development. We advise that if the foul water plan is changed at a later stage, and will no longer be removed from site for treatment, then impacts to designated sites from discharges will need to be addressed.	The Applicant notes that NE welcome the mitigation measures for water quality impacts during construction on Barn Hill Meadows SSSI. The potential water quality impacts during construction are addressed in the Framework CEMP. Requirement 11 of the draft DCO **[AS-008]** requires the submission of a CEMP, which must be substantially in accordance with the Framework CEMP, to be submitted and approved by the Local Planning Authority in consultation with Natural England prior to commencement of the development. The comment regarding a foul water drainage plan is noted. As outlined in Chapter 9 Flood Risk, Drainage and Water Environment**,** ES Volume 1 **[APP-061]**, foul water from the operations and maintenance hub at Johnson's Farm and from the operations building at the Grid Connection Substations will be drained to a septic tank which will be emptied regularly under contract with a registered recycling and waste management contractor. This will be captured in the foul water drainage plan, which is secured via requirement 9 of the DCO Schedule 2 and must be in accordance with the Framework Surface Water Drainage Strategy **[APP-098].** The framework surface water drainage strategy confirms that foul water will go to a septic tank and removed for treatment. In the very unlikely event that this changed, the Applicant would have to agree amended details with the relevant planning authority and demonstrate there are no materially new or materially different environmental effects under Requirement 3(2), or make an application to amend the DCO. In both circumstances any associated impacts to designated sites would be considered.

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RR-266	**NE20- Protected species – General** Natural England has adopted standing advice for protected species, which includes guidance on survey and mitigation measures. Natural England is not providing bespoke advice on the protected species information provided in the ES for this project. A separate protected species licence from Natural England or Defra may be required. Applicants should refer to the guidance at Wildlife licences: when you need to apply to check to see if a mitigation licence is required. Applicants can also make use of Natural England's charged service Pre Submission Screening Service for a review of a draft wildlife licence application. Natural England can then review a full draft licence application to issue a Letter of No Impediment (LONI) which explains that based on the information reviewed to date, that it sees no impediment to a licence being granted in the future should the DCO be issued. See Advice Note Eleven, Annex C – Natural England and the Planning Inspectorate | National Infrastructure Planning for details of the LONI process. **Natural England comment on the mechanism for securing mitigation / compensation measures in the DCO.** Requirement for mitigation has not been assessed by Natural England.	Natural England's advice is noted. No protected species licences (other than for great crested newts – see below) are required at this time, however pre-construction surveys would be undertaken to confirm this remains the case. The Applicant has now obtained the full Impact Assessment and Conservation Payment Certificate. A District Level Licence for great crested newts will be applied for on receipt of consent for the Scheme.
RR-266	**NE21- BNG – General** Natural England have not undertaken a detailed assessment of the metric calculations provided within document 7.11 Biodiversity Net Gain Assessment Report [APP-243] (dated 19 December 2023). However, we have provided general advice on incorporation of BNG within NSIP proposals below. The Environment Act 2021 includes NSIPs in the requirement for BNG. The biodiversity gain objective for NSIPs is defined as at least a 10% increase in the pre-development biodiversity value of the on-site habitat. The biodiversity baseline should include all land contained within the site's red line boundary and proposals can be iteratively refined over time and throughout detailed design. We encourage developers to: • develop their BNG proposals in adherence with well-established BNG principles. • use the latest version of the Defra biodiversity metric, adhering to the metric guidance. **Natural England comment on the mechanism for securing mitigation / compensation measures in the DCO.**	The Applicant notes this comment. The applicant has used the well-established BNG principles and the latest version of the Defra biodiversity metric, adhering to the metric guidance, for the BNG assessment. In regard to the comment "*The biodiversity baseline should include all land contained within the site's red line boundary and proposals can be iteratively refined over time and throughout detailed design*.", we have used a BNG Parameters plan to reflect the impacted BNG habitats; to more accurately reflect the biodiversity impact of the scheme the influence on design progression, this will continue to be refined through design stages. The ecology surveys have captured all land within the Order limits so if any additional habitat impacts are required this can be accurately reflected in updated BNG calculations. The Applicant notes that NE welcome the commitment to deliver BNG on this project, as set out in the Framework Landscape and Ecological Management Plan (LEMP) **[APP-246]** which has been prepared for the DCO Application. A detailed LEMP will need to be approved by the relevant local authorities prior to construction and is secured by Requirement 6 in Schedule 2 of the draft DCO **[AS-008].** The Framework LEMP **[APP-246]** sets out the principles for how the land will be managed throughout the operational phase, following the completion of construction, and specifies mitigation and enhancement measures that will support the delivery of BNG. A Biodiversity Net Gain strategy which must be in accordance with the Framework LEMP is secured by Requirement 7 of the draft DCO **[AS-008].**

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	We welcome the commitment to delivering BNG on this project. We recommend that the target increase in BNG across all biodiversity unit types is secured by a suitably worded requirement in the DCO. Biodiversity gains should ideally be secured for a minimum of 30 years and be subject to adaptive and monitoring.	
RR-266	**NE22- Soils and BMV Agricultural Land – Detailed comments** Natural England note paragraph 1.1.4 of the Framework Soil Management Plan [APP-241]. Within the IoQ Guidance, there is a preferred set of handling practices, which are set out in Sheets A to D (these correspond to the Defra Construction Code). These sheets set out the methodology for soil stripping; creating soil stockpiles; excavation of soil stockpiles; and soil replacement, all using Excavators and dump trucks. These are considered best practice to achieve high standards required for BMV reinstatement. Natural England advise when referring to IoQ guidance we would expect specific sheets to be referred to alongside the reference. Natural England welcome this approach to on-site supervision set out in paragraphs 1.2.7 to 1.2.9. 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 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. Soil handling should normally be avoided during 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. This is recognised in EN010143/APP/7.9 Table 11. Natural England advises the same commitment should be referenced during the construction phase.	Paragraph 1.1.4 of the Framework Soil Management Plan (SMP) **[APP-241]** explains the relevance of IoQ guidance on the handling of soils in mineral workings to infrastructure projects. The Framework SMP describes that in most locations soil stripping will be undertaken by excavator and dump truck with the described methodology following the Sequential Bed/Strip Practice (i.e. as per Sheet A of the IoQ guidance). Where this is not possible the Framework SMP confirms that operations will follow an alternative method set out in the IoQ guidance. Paragraphs 4.6.7 and 4.6.8 of the Framework SMP describe that soil stockpiles along cable trenches are to be formed using backacting/360° excavator with no transport (dump truck) required; and where soil transport is required the method described in Sheet B of the IoQ guidance will be followed. Paragraphs 4.10.2 and 4.10.3 describe that in most locations on the Cable Corridors there will be direct excavation of the soil from the stockpiles using a long-reach back-acting/360° excavator; and that where larger stockpiles are created and there is a necessity for soils to be transported to the reinstatement area via dump truck the methodology described in Sheet C of the IoQ guidance will be followed. Paragraph 4.10.13 describes that soil replacement is to follow the methodology set out in Sheet D of the IoQ guidance. The detailed SMP to be prepared post-consent will continue to reference specific sheets providing more detail as necessary. Natural England's comment regarding the approach to on-site supervision is noted. Section 4.3 of the Framework SMP sets out a two-stage methodology, comprising a moisture state test and a consistency test, for the field testing of soil moisture conditions. The approach follows Table 4.2 of the IoQ guidance, with the advice/methodology presented in Table 4.2 of the IoQ guidance summarised in Tables 1 and 2 of the Framework Soil Management Plan (SMP) **[APP-241]**. The IoQ guidance (Part 1, Supplementary Note 4) provides generic guidelines on a rainfall protocol for the suspension and restart of soil handling operations. This is reflected in Section 4.2 of the Framework SMP **[APP-241]**. Where practicable, soils will be handled when in a dry and friable condition. However, as noted at paragraph 4.2.7 of the Framework SMP **[APP-241]**, due to the scale of the Scheme, a project-wide seasonal constraint to the construction programme has not been recommended as this may not be achievable in practice; and it may be necessary for some soils to be handled wet. Additional mitigation measures for wet working are described in the Framework SMP (paragraph 4.2.8) with a provision that '*should wet handling of soils be required, appropriate soil handling, drying and cultivation methodologies will be set out in the detailed SMP and in site-specific construction method statements, as required'*. These wet working measures would be based on good practice guidance measures and would also be applied to the wetter, clay soils, as required. It is noted that Table 11 of the Framework Decommissioning Environmental Management Plan **[APP-240]** does not commit to all soil handling being restricted to October to March inclusive, but states that this will be undertaken where practicable. The scale of works at decommissioning is expected to be less than required at construction and so this may be more easily accommodated than during construction.

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RR-266	**NE22- Soils and BMV Agricultural Land – Detailed comments** Topsoil stripping depths should be informed through a detailed soil survey.	Soil survey (and record of topsoil depths) has been undertaken within the Solar PV Site and Ecological Mitigation Area (at survey densities agreed with Natural England) by specialist soil surveyors. As stated in Chapter 15: Soil and Agricultural Land, ES Volume 1 **[APP-067]** further targeted survey of the Cable Corridors will be undertaken (prior to construction) on any agricultural land within the working corridor (i.e., agricultural land that will be subject to direct disturbance) and the information used to inform the detailed SMP and provide baseline land quality data for the reinstatement of land. The survey would be conducted to the densities described by NE in their Discretionary Advice Service (DAS) response (as presented in Appendix 15-4, ES Volume 2 **[APP-119])**, with flexibilities around density depending on land quality identified in the Predictive ALC Mapping report (version 2): detailed survey where best and most versatile (BMV) land is identified and semi detailed survey where land is expected to be non-BMV.
RR-266	**NE22- Soils and BMV Agricultural Land – Detailed comments** The soil survey will also identify the different soil types, and can be used to inform storage requirements, including the volumes and areas necessary. Where topsoil is proposed to be stripped, typically for construction compounds; access tracks and laying cabling, the soil handling methodology (movement, storage & replacement) and soil protection proposals are reviewed to ensure that appropriate mitigation is in place to allow for the restoration of the land to the baseline ALC Grade.	The Applicant notes this comment, and it is confirmed that soil survey data will be used to inform storage requirements, including the volumes and areas necessary in the detailed SMP and/or method statements. The detailed SMP will build upon the Framework SMP **[APP-241]** and will ensure that appropriate mitigation is in place to protect the soil types present (as identified through survey). Application of the SMP (and the good practice measures contained within) will ensure soil quality is maintained allowing soils to support/achieve the same ALC grading upon restoration as prior to the Scheme (note that the ALC guidance states that ALC survey of reinstated land should not be undertaken for five-years post-restoration to allow time for 'bedding in').
RR-266	**NE22- Soils and BMV Agricultural Land – Detailed comments** For topsoil the preference is for a 1 to 3m height to minimize the impact of storage on biological processes, whereas for subsoils where the biological activity is lower, subject to safe operations, mounds are often raised to heights of 3 to 5m depending on the resilience of the soils to compaction.	Section 4.6 of the Framework SMP **[APP-241]** discusses the good practice that will be in place for the creation of stockpiles, and states that topsoil stockpiles should not exceed 3 m in height and subsoil stockpiles should not exceed 5 m in height. Stockpile heights appropriate to specific to the soil types /conditions present on site will be set out in the detailed SMP. The appropriateness of higher stockpiles will be established on a location-by-location basis.

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RR-266	**NE22- Soils and BMV Agricultural Land – Detailed comments** Natural England notes and welcomes the applicant's commitments to providing a detailed Soil Management Plan (SMP) in paragraph 4.7.1.	Paragraph 4.7.2 commits to seeding of stockpiles where soil is expected to be stored for a period of more than six months (subject to landowner agreement) to protect the soil against erosion, minimise soil nutrient loss, and maintain soil biological activity. As stated in paragraph 4.2.7 of the Framework SMP **[APP-241]**, due to the scale of the Scheme, a project-wide seasonal constraint to the construction programme has not been recommended as this may not be achievable in practice, but appropriate measures for soil handling will be in place through the detailed SMP. Sections 4.6 to 4.9 of the Framework SMP **[APP-241]** provide further details of good practice measures to prevent soil erosion. The exact amount (%) of BMV land that has been identified will be outlined in the detailed SMP.
RR-266	**NE22- Soils and BMV Agricultural Land – Detailed comments** The Environmental Statement and associated SMP needs to clearly demonstrate how the ALC Grades and soil types will inform soil handling and restoration, setting out the site-specific mitigation measures with reference to the best practice guidance (Defra Construction Code of Practice), i.e. secondary mitigation measures. The British Society of Soil Science has published the Guidance Note Benefitting from Soil Management in Development and Construction which also contains useful guidance. Natural England note and welcome the commitment stated in paragraph 4.7.2; however, we advise this commitment emphasises the importance for a closed season during winter months as establishment of low maintenance ground cover would be hindered and risk to soil erosion increased.	The comment is noted. Chapter 15: Soils and Agricultural Land, ES Volume 1 **[APP-067]** and the Framework SMP **[APP-241]** clearly set out how good practice measures (such as those described in Defra's Construction Code of Practice and the BSSS's Guidance Note) will be used to inform appropriate good practice soil management measures through the detailed SMP. Paragraph 4.7.2 commits to seeding of stockpiles where soil is expected to be stored for a period of more than six months (subject to landowner agreement) to protect the soil against erosion, minimise soil nutrient loss, and maintain soil biological activity. As discussed above and stated in paragraph 4.2.7 of the Framework SMP **[APP-241]**, due to the scale of the Scheme, a project-wide seasonal constraint to the construction programme has not been recommended as this may not be achievable in practice, but appropriate measures for soil handling will be in place through the detailed SMP. Sections 4.6 to 4.9 of the Framework SMP **[APP-241]** provide further details of good practice measures to prevent soil erosion.
RR-266	**NE22- Soils and BMV Agricultural Land – Detailed comments** The SMP should recognise the exact amount (%) of BMV land that has been identified in the ALC report. We advise the measures to be implemented to short term soil stockpiles to avoid or reduce potential long-term damage or loss should be clarified (paragraph 4.7.5). An SRP will normally form part of the Materials Management Plan for the site (paragraph 4.8.2). It should include the following: • maps showing topsoil and subsoil types, and the areas to be stripped and left in-situ. • Methods (including machinery) for stripping, stockpiling, respreading, and ameliorating the soils. • location of soil stockpiles and content (e.g. Topsoil type A, subsoil type B). • schedules of volumes for each material. • expected after-use for each soil whether topsoil to be used on site, used, or sold off site, or subsoil to be retained for landscape areas, used as structural fill or for topsoil manufacture. • identification of person responsible for supervising soil management.	The Applicant notes this comment. The Framework SMP **[APP-241]** has been updated to include the measures outlined in this comment and is submitted at Deadline 1. An SRP will form part of a detailed SMP which will be substantially in accordance with the Framework SMP **[APP-241]** and be secured by a requirement in Schedule 2 of the draft DCO **[AS-008].**
RR-266	**NE22- Soils and BMV Agricultural Land – Detailed comments**	The comment is noted. Paragraph 4.10.15 refers to Supplementary Note 3: Compaction of the IoQ guidance and further details of appropriate soil decompaction will be provided in the detailed SMP,

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	The depth of decompaction should reflect the depth of compaction (paragraph 4.10.15). Additionally, 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 O.pdf. It is unclear when the 'after' statement will take place (paragraph 4.10.18). Natural England advise this should take place for all phases where both permanent and temporary impacts are expected.	referring to Sheets N and O of the IoQ guidance (decompaction by excavator bucket and decompaction by bulldozer drawn tines) as appropriate. As set out in paragraph 4.10.16 of the Framework SMP, post-restoration surveys will be required across all land reinstated to agriculture, to determine whether target soil profile specifications have been met, and it is anticipated that post-construction soil surveys will be undertaken to record the 'after' statement of physical characteristics of the restored soils (paragraph 4.10.17). These surveys would be undertaken on completion of restoration of land to agriculture along the cable corridors. As the poles of the PV mounting structures (frames which hold the solar panels) are directly driven directly into the ground, there is no requirement for the excavation of foundations or disturbance to the surrounding land surface (soils) within the Solar PV Site for the solar PV, and therefore post-restoration surveys will not be undertaken in this area.
RR-266	**NE22- Soils and BMV Agricultural Land – Detailed comments** We note Table 9 of the Framework Operational Environmental Management Plan [APP-239]. 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 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.	Soil movement is not expected during the operational phase, although localised small scale maintenance operations may require excavations. Table 9 of the Framework Operational Environmental Management Plan **[APP-239]** states '*soils should only be moved under the driest practicable conditions, and this must take account of prevailing weather conditions'*. Works would be planned to be undertaken when soils were in a dry and friable condition, however it must be noted that in the event of emergency maintenance it may be necessary to handle soils when wet. Appropriate Additional mitigation measures for wet working are described in the Framework SMP **[APP-241]** (paragraph 4.2.8) and would be fully described in the Risk Assessment Method Statement (RAMS), Operating Procedure or similar produced to cover the works. As stated above, Section 4.3 of the Framework SMP **[APP-241]** sets out a methodology for the field testing of soil moisture conditions taken from Table 4.2 of the IoQ guidance; and Section 4.2 provides a rainfall protocol for the suspension and restart of soil handling operations.
RR-266	**NE22- Soils and BMV Agricultural Land – Detailed comments** The commitment made in paragraph 1.1.4 of the Framework Decommissioning Management Plan [APP-240] is welcomed, and the additional consideration of land management is acknowledged. It is clear that the intention is to retain the current ALC grade and go beyond this. Nonetheless, Natural England consider that the commitment could be altered to be clear that the site will be restored at a minimum to the same ALC grade, and additional measures will be taken to further benefit the land quality/productivity. We consider the specific commitment to retaining the same ALC grade to be key to provide certainty in terms of the DCO that the land quality will not be affected. Restoration criteria should be included in the detailed SMP to ensure the restored land is aligned to the ALC survey results.	The Applicant notes that NE welcome the commitment made in paragraph 1.1.4 of the Framework DEMP **[APP-240]**, and that additional consideration of land management is acknowledged. As set out in the Framework CEMP **[APP-238]** the land within the Grid Connection Corridor will be returned to the landowner after restoration. As set out in the Framework DEMP **[APP-240]** the land within the Solar PV Area will be restored using the soils which were striped and stockpiled during construction. Restoration criteria will be included in the detailed SMP to ensure the restored land is aligned to the ALC survey results.
RR-266	**NE22- Soils and BMV Agricultural Land – Detailed comments** **Natural England comment on the mechanism for securing mitigation / compensation measures in the DCO.** We note and welcome that the Soil Management Plan is secured within Schedule 2, parts 15 (1) and (2), of the DCO.	The Applicant notes this comment.

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RR-266	**Natural England's detailed comments on the Development Consent Order (DCO) and associated documents.** Page 38 Schedule 2, requirement 5 We welcome that Schedule 2, requirement 5 sets out how the final detailed design should be adhered to, including the following: *"(2) The details submitted must accord with the outline design principles statement*", and "(3) *The authorised development must be carried out in accordance with the approved details*." However, as there are outstanding matters as detailed in Table 1 (all 'amber' issues), we cannot yet provide agreement with the final detailed design. Therefore, this also remains an 'amber' issue at present.	The Framework LEMP **[APP-246]** has been updated as required as a result of the 2023/24 wintering bird survey results. The updated Framework LEMP **[APP-246]** will be submitted at Deadline 1. Please refer to response to NE7 above. The Applicant looks forward to continued engagement with Natural England to address the outstanding 'amber' issues.
RR-266	**Natural England's detailed comments on the Development Consent Order (DCO) and associated documents.** Page 38 Schedule 2, requirement 6 We advise that the securing of the Landscape and Ecological Management Plan (LEMP), with this being "…*substantially in accordance with…"* the framework LEMP (fLEMP), is an essential requirement. However, we advise that we do not consider that the current fLEMP sufficient, as updates will be required as detailed in NE1 and NE7 in Part II, Table 1. Please refer to the below for a summary of the advice in these sections. Summary of relevant advice in NE1 and NE7 NE1: As we are currently awaiting the results of the 2023-2024 wintering bird surveys from the Applicant, we cannot yet comment on whether mitigation measures detailed in the Landscape and Ecological Management Plan (LEMP) (termed "Ecology Mitigation Area" and detailed from 6.1.72 to 6.1.86 in this document) will be sufficient to avoid adverse effects on integrity of the Humber Estuary SPA / Ramsar and the Lower Derwent Valley SPA / Ramsar designated sites. Once we have received this survey data, and any subsequent updates to the fLEMP, we will be able to provide further commentary. Please refer to NE1 (Part II, Table 1) for further details. NE7: We advise that the LEMP should be updated to include a restoration plan for the removed vegetation within the River Derwent SAC. Please refer to NE7 (Part II, Table 1) for further details.	The Applicant notes this comment. The Framework LEMP **[APP-246]** has been updated as required as a result of the 2023/24 wintering bird survey results. The updated Framework LEMP will be submitted at Deadline 1. Please refer to response NE7 above.
RR-266	**Natural England's detailed comments on the Development Consent Order (DCO) and associated documents.** Page 38 Schedule 2, requirement 7 We welcome the requirement for the biodiversity net gain strategy to be submitted and approved to the relevant planning authority prior to the	The Applicant notes that NE welcome the commitment to deliver BNG on this project, as set out in the Framework Landscape and Ecological Management Plan (LEMP) **[APP-246]** which has been prepared for the DCO Application. A detailed LEMP will need to be approved by the relevant local authorities prior to construction and is secured by Requirement 6 in Schedule 2 of the draft DCO **[AS-008].**

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	commencement of development. As noted in NE21, we recommend that this is least a 10% increase in the pre-development biodiversity value of the on-site habitat, is secured for a minimum of 30 years, and is subject to adaptive management and monitoring.	The Framework LEMP **[APP-246]** sets out the principles for how the land will be managed throughout the operational phase, following the completion of construction, and specifies mitigation and enhancement measures that will support the delivery of BNG. A Biodiversity Net Gain strategy which must be in accordance with the Framework LEMP is secured by Requirement 7 of the draft DCO **[AS-008].** An updated Biodiversity Net Gain Assessment has been submitted at Deadline 1 which predicts that predicted to result in a net gain of 80.42% for area-based habitat units, a net gain of 10.30% for hedgerow units, and a net gain of 10.09% for watercourse units. The Framework LEMP **[APP-246]** sets out that the Applicant commits to achieving a minimum 10% BNG for all units
RR-266	**Natural England's detailed comments on the Development Consent Order (DCO) and associated documents.** Page 39 Schedule 2, requirement 9 Natural England notes that surface water drainage measures are secured. The production of the CEMP is secured within schedule 2, point 11 of the DCO. Natural England advises that the CEMP should include all mitigation measures in relation to water quality impacts put forward, specifically those which have been established for Horizontal Directional Drilling, surface water drainage, and the future Water Management Plan. Natural England welcomes the use of Horizontal Directional Drilling as a method for managing water quality and disturbance impacts to designated sites. All water quality mitigation measures relating to Horizontal Directional Drilling should be included in the CEMP and secured in the DCO. The inclusion of the water management plan within the CEMP should be secured within the DCO.	The water quality mitigation measures outlined in Chapter 9 Flood Risk, Drainage and Water Environment, ES Volume 1 **[APP-061]**, as referred to in comment NE4, are secured in the DCO via Table 4 of the Framework CEMP **[APP-238].** The Final CEMP is required to be substantially in accordance with the Framework CEMP as per DCO **[AS-008]** Schedule 2, Requirement 11. With regard to HDD, the measures in the Framework CEMP **[APP-238]** include requirements for site specific groundwater risk assessment prior to commencing work, application of stated buffers around watercourses and flood defences, the need for Hydraulic Fracture (frac-out) Risk Assessment, monitoring of the drilling path and use of water based drilling fluids. These measures would be expanded upon in the Final CEMP to be produced by the Contractor post-consent as specified in the Framework CEMP **[APP-238]**, and thus secured in the DCO. The water management plan will be an appendix to the Final CEMP, as secured in the DCO via the Framework CEMP **[APP-238]**.
RR-266	**Natural England's detailed comments on the Development Consent Order (DCO) and associated documents.** Page 39-40 Schedule 2, requirement 11 We welcome that the measures in the Construction Environmental Management Plan (CEMP) will be secured through requirement 11, and that approval will be required from Natural England (as detailed in 11(1)). As per Part II, Table 1, we have advised several aspects should be secured within the CEMP using more specific wording, and the framework CEMP may require updates. Therefore, this remains as 'amber' at present. However, we can provide agreement with the inclusion of this requirement more generally, subject to the final CEMP containing all elements Natural England have advised on. A summary of all aspects we have advised should be secured in the CEMP / through the DCO is provided below (refer to Part II, Table 1 for full advice).	The water quality mitigation measures outlined in Chapter 9 Flood Risk, Drainage and Water Environment, ES Volume 1 **[APP-061]** are secured in the DCO via Table 4 of the Framework CEMP **[APP-238]**. The Final CEMP would need to be substantially in accordance with the Framework CEMP as per DCO **[AS-008]** Schedule 2, requirement 11. With regard to HDD, the measures in the Framework CEMP **[APP-238]** include requirements for site specific groundwater risk assessment prior to commencing work, application of stated buffers around watercourses and flood defences, the need for Hydraulic Fracture (frac-out) Risk Assessment, monitoring of the drilling path and use of water based drilling fluids. These measures would be expanded upon in the detailed CEMP to be produced by the Contractor post-consent as specified in the Framework CEMP **[APP-238]**, and thus secured in the DCO. The comment regarding the WMP is noted. The WMP will be an appendix to the Final CEMP, as secured in the DCO **[AS-008]** via the Framework CEMP **[APP-238]**. The comment regarding a foul water drainage plan is noted. As outlined in Chapter 9 Flood Risk, Drainage and Water Environment, ES Volume 1 **[APP-061]**, foul water from the operations and

RR Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
	Summary of relevant CEMP advice (NE4, NE5, NE7, NE8, NE11, NE16, NE19) NE4: We advise all water quality mitigation measures relating to HDD should be included in the CEMP and secured in the DCO. The water management plan within the CEMP should also be secured within the DCO. NE5: The buffers for HDD in relation to specific watercourses should be established within the CEMP. Where HDD may occur within the SAC, alongside any noise mitigation measures, should be detailed in the CEMP and secured within the DCO. NE7: The buffers for HDD in relation to specific watercourses should be established within the CEMP. Where HDD may occur within the SAC should be detailed in the CEMP and secured within the DCO. NE8: All dust mitigation measures included in the CEMP should be secured in the DCO, Including the dust management plan. NE11: We advise the INNS biosecurity measures should be included within the final CEMP and secured in this section of the DCO. NE16 and NE17: Water quality mitigation measures should be included within the CEMP and secured within the DCO. We note that Schedule 2, requirement 9 includes a statement that any foul water drainage plan must be submitted to the relevant planning authority prior to development. We advise that if the foul water plan is changed at a later stage, and will no longer be removed from site for treatment, then impacts to designated sites from discharges will need to be addressed.	maintenance hub at Johnson's Farm and from the operations building at the Grid Connection Substations will be drained to a septic tank which will be emptied regularly under contract with a registered recycling and waste management contractor. This will be captured in the foul water drainage plan, which is secured via requirement 9 of the DCO Schedule 2 and must be in accordance with the Framework Surface Water Drainage Strategy **[APP-098]**. The framework surface water drainage strategy confirms that foul water will go to a septic tank and removed for treatment. In the very unlikely event that this changed, the Applicant would have to agree amended details with the relevant planning authority and demonstrate there are no materially new or materially different environmental effects under Requirement 3(2), or make an application to amend the DCO. In both circumstances any associated impacts to designated sites would be considered. The requirement for noise fencing is included in Table 3 of the Framework CEMP **[APP-238]** for otter using the River Derwent, River Ouse and DE53. Please refer to response for NE5 above regarding requirements for other watercourses. Appropriate buffers for the watercourses are included within Table 3 of the Framework CEMP **[APP-238]**. *With the exception of the open trench crossing and HDD of watercourses for cable installation, where required, no works will be undertaken within at least 10 m of watercourses and ponds (30 m of the River Ouse, River Derwent and Watercourse DE53), which is considered sufficient to mitigate for potential hazards such as chemical and soils spills to avoid potential direct impacts to watercourses and any protected/notable species that use them.*
RR-266	**Natural England's detailed comments on the Development Consent Order (DCO) and associated documents.** Page 40 Schedule 2, requirement 12 We welcome that this requirement secures the Operational Environmental Management Plan (OEMP), and highlights this must be substantially in accordance with the framework OEMP. We advise this is an essential requirement.	The Applicant notes this comment.
RR-266	**Natural England's detailed comments on the Development Consent Order (DCO) and associated documents.** Page 40 Schedule 2, requirement 15 We welcome that this requirement secures the soil management plan (SMP), and highlights this must be substantially in accordance with the framework SMP. We advise this is an essential requirement.	The Applicant notes this comment.

RR Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
RR-266	**Natural England's detailed comments on the Development Consent Order (DCO) and associated documents.** Page 41 Schedule 2, requirement 18 We note this requirement is for decommissioning and restoration and advise this is an essential requirement. We advise that Natural England are consulted on this plan once finalised, if impacts to designated sites during decommissioning are identified.	The Applicant considers that naming Natural England as a specific consultee is unnecessary. If impacts to designated sites are identified during decommissioning then the relevant planning authority can consult Natural England in its role as statutory nature consultation body to the extent the relevant planning considers necessary and appropriate.

Northern Gas Networks

Table 2-2. Applicant's Responses to Relevant Representations – Northern Gas Networks

Examination Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
AS-020	I am particularly interested in the protection and mitigation for our High and Intermediate Pressure gas assets I have attached a word document: "*East Yorkshire solar farm, Spaldington. High and intermediate Pressure Gas Pipeline Safety Parameters*" Please can you respond to the 12 safety stipulations outlined in the above document. I have also attached five other relevant documents that are referred to within the above. Hope this information is clear, but if you need further clarification, please do not hesitate to come back to me. I have referred to the Major Accident Hazard Pipeline 'Asselby – Harswell' and an Intermediate Pressure pipeline within the above mentioned document, to which both pipelines pass through thelocality of the development **Note 1:** The issues I am addressing are related to the below assets only and thus, this document is specifically aimed towards protecting the existing Northern Gas Networks High Pressure (HP) Gas Transmission pipeline and Intermediate Pressure (IP) pipeline and associated equipment, located within the development area and immediately adjacent/or parallel to the planned development. With this being said, it must be noted that there are also Low Pressure (LP) gas pipelines that pass through and/or close to the development land. This will be dealt with separately to the HP and IP pipelines. (please see gas plan extract below) As stated in UKOPA (United Kingdom Onshore Pipeline Operators Association) 'Good Practice Guide' A Solar PV Installation could affect a buried pipeline operated by a UKOPA member company in the following ways: • Damage to the pipeline caused during the construction of the Solar PV Installation during site preparation work including the excavation of soils associated with site levelling, the building of construction compounds, the construction of access roads, cable trenching, fencing etc. • Damage caused by drainage of the site including the excavation of drainage ditches. • Damage as a result of piling or the construction of foundations for the solar panels or security fencing.	The protective provisions for the protection of electricity, gas, water and sewerage undertakers in Part 1 of Schedule 14 currently apply to protect Northern Gas Networks apparatus. Notwithstanding, the Applicant is engaged with Northern Gas Networks to seek to agree a form of protective provisions to be included within the draft DCO. The Applicant is confident agreement can be reached early in Examination. The Applicant is aware of these assets noted in point 1. The Framework Construction Environmental Management Plan **[APP-238]** includes mitigation measures to avoid impacts on existing utility infrastructure above and below ground as a result of excavation and engineering operations, which include: • Locating the Scheme outside of utilities protected zones; • Identification of unknown utilities before excavation (for example by scanning using CAT and Genny); • Consultation and agreement of construction/demobilisation methods will be undertaken with utility asset owners prior to works commencing; and • Infrastructure that crosses the Scheme will be mapped and avoided through the design. The Draft DCO **[AS-008]** includes protective provisions for the protection of utility assets. Pre and post construction road #surveys will also be undertaken at identified locations in consultation with the Local Highway Authority With regards to Point 4, a Lightning Assessment is not considered necessary as there is no increased risk.

Examination Ref. No.	Comments from Relevant Representations	Response to Relevant Representation

- Damage caused by heavy construction traffic crossing over or close to the pipeline.
- Damage to the pipeline caused during the repair or maintenance of the Solar PV Installation.
- Electrical interference with the pipeline's cathodic protection (CP) system, see Section 4.2.
- Restricting access to the pipeline both during normal operation of the pipeline or in the event of a pipeline emergency.

The control of risks arising from third party damage to pipelines is addressed by Regulations 15 and 16 of the Pipelines Safety Regulations 1996 (PSR). PSR Regulation 15 states:
'No person shall cause such damage to a pipeline as may give rise to a danger to persons'.

The gas assets that are close to your proposal form part of the Northern Gas Networks bulk supply Gas Transmission system and are **registered with the Health and Safety Executive (HSE) as Major Accident Hazard Pipelines.**

Any damage or disruption to any of the pieces of plant in question is likely to give rise to grave safety, environmental and security of gas supply issues.
Going forward, I would like agreement with either the applicant (or applicants agent) and /or**,** with any future developer, that **ALL** our below stipulations are either **"Not Applicable"** or **will be addressed** throughout the planning, construction and subsequent operational processes, as appropriate.

If we agree that the safety and integrity of our asset will either, not be affected, or that the relevant protective measures will be incorporated within the development proposal, **then, subsequently, I will arrange for any related objection to be withdrawn**.

As I am never sure exactly what is required for the installation of a new solar farm and what groundworks are required/undertaken near our buried plant the following information and safety stipulations are to be applied, as appropriate/plant protection measures put in place as required to the actual development proposal.
I would like a response relating to items 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11 and 12 below.

1. There is 1 NGN High Pressure Gas Transmission Pipeline and 1 NGN Intermediate Pressure pipeline which passes close to and/or through the planned development area. They are as follows:-

- 1." **Asselby to Harswell** " which is 100 mm dia. (4") with **38bar** Maximal Operating Pressure (**equivalent to 551 pounds/inch^2**). **This is registered as a Major Accident Hazard Pipeline and the associated Pipeline Safety Reference for this pipeline is 1961. Under the Land Use**

Examination Ref. No.	Comments from Relevant Representations	Response to Relevant Representation

Planning Regulations, I understand that the HSE consultation distance for this pipeline is 17 metres.

(The Pipe Reference No.1 as indicated by dashed yellow line in our MAPS extracts below Figure 1)
For this particular asset**, our safety advice** is based on industry standard (IGEM TD1 Ed. 6), which states that there should be **no "Occupied Buildings"**, within **17 metres** of the pipeline, in other words **a strip 34 metres** wide centred on the pipeline **should be clear of buildings** (This includes any permanent or temporary static caravans). The Building Proximity Distance (BPD) is 17 metres
(**Note 2:** based on; less than 30% SMYS (Specified Minimum Yield Stress) and material wall thickness of 4.78mm).

- 2. 250mm PE IP DTMR*0010062589 with a Maximal Operating Pressure of **7 bar (equivalent to 101 pounds/inch^2)**.

(The Pipe Reference No.2 as indicated by dashed green line in our MAPS extracts below Figure 2)
For this particular asset**, our safety advice** is based on industry standard (IGEM TD3 Ed. 5), which states that there should be **no "Occupied Buildings"**, within **6 metres** of the pipeline, in other words **a strip 12 metres** wide centred on the pipeline **should be clear of buildings** (This includes any permanent or temporary static caravans). The Building Proximity Distance (BPD) is 6 metres.

2. **In addition**, we have a **legal rights** along the length of, and centred on the above pipelines which are recorded by way of a deeds of easement, nothing should be placed in or on the easement, that would prevent NGN gaining access to the pipe.

The deed will confirm that NGN as the pipeline owner should have access to the pipe at all reasonable times and at any time in an emergency to carryout repairs, maintenance and monitoring. The developer in laying out the development must consider NGN's right of access over the adjoining land and along the easement strip to facilitate future access for both personnel and machinery.

Regardless of item 1 above, NGN would not agree to any occupied buildings being placed within the easement.

It is unacceptable for any building to be constructed directly over a High Pressure gas Transmission pipeline.
The developer will need to confirm that the gas pipeline will have no solar panels placed over it or within the easement and/or DPB.

(If applicable, this applies to the positioning of any permanent or temporary static caravans).
Asselby – Harswell – NGN Easement Reference: NE408070

Examination Ref. No.	Comments from Relevant Representations	Response to Relevant Representation

250mm IP PE – NGN Easement Referecne: NE408070

e. NGN would expect to be consulted and agree to any other types of structures planned within the easement. We would also want to agree to any proposed new services placed within or close the easement and if electric conductors, we may require interference testing to be undertaken by the third party in order to ensure there is no related degradation of our pipeline or its protection systems. We would stipulate a minimum clearance of 600mm between our asset and any new service.

In order to assess any impacts of the Solar PV Installation on the pipeline's cathodic protection (CP) system, NGN will be required to carry out pre-construction and post-construction monitoring. Potential impacts could be as a result of:

- The Solar PV Installation grounding rings or grounding networks shielding the pipeline from the CP system.
- AC interference from buried or above ground AC cables.
- Stay current direct current (DC) interference.

The potential for AC or DC interference could increase under fault conditions or after a period of time if some degradation of the cabling insulation occurs.

Depending upon the perceived risks of the above and / or the result of initial monitoring surveys, NGN may be required to install long term monitoring systems in order to detect any impact which may compromise the CP system.

The costs of any monitoring systems and any remediation works that are deemed necessary would be recharged to the Solar PV Installation developer.
There are likely to be pipeline related test posts situated close to the pipe and within the development area; NGN would expect that these test posts must remain in situ, or be repositioned at the developers expense. Similarly, NGN would need to agree to any new road proposals within the easement.

Note 3: If plots of land/development are sold to private individuals through which our pipeline passes, the easement rights will affect all the individuals whose property/land ownership encompasses over the easement, basically the individual property/land owners will have to comply with the easement stipulations.
e.g. not be able to place garden buildings within the easement or build extensions out into the easement.
This should be made clear to them at the point of purchase.

4. It is likely that a Solar PV Installation will result in an increased risk of a lightning strike that could impact NGN's above mentioned buried pipeline. Lightning could pass from the earth system to the pipeline. Over voltages due to lightning may cause serious damage to the pipeline CP system and other parts of the network.

Examination Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
	NGN will require a Lightning Assessment to be carried out by an expert in the relevant field. 5. NGN would also want to limit any change in ground levels over and in the vicinity of the existing pipeline(s) to ensure that the existing pipeline depth of cover is not reduced and also that any increase in overburden is limited, such that the total depth of cover is **no greater than 2.5 metres** (as measured from pipe crown to new ground level). NGN would also need to ensure that any planned retaining walls did not adversely affect the integrity of our pipes, and in order to ensure this was the case, we would want an expert in the relevant field to assess any such proposals. Should percussive piling be necessary, NGN would want to limit any vibration within **15 metres** of our pipelines to a measured **< 75mm/s ppv**. (Please see attached pipeline safety document section 7.12). 6. If the development includes any **drainage ponds or Lagoons**, these must not be placed over the pipeline(s) route at any point. (In other words, the pipelines must not be submerged under water). We would want any associated batter or banking to be constructed so that it does not encroach into our easement and a safe distance is maintained. We may require confirmation that any associated banking will not transmit any loading onto the pipe. 7. Additionally, for any **recreation or landscaped spaces**, which are proposed close to our gas pipeline (s), we have tree planting guidelines which advise the types and species which are safe to plant and provide recommended minimum distances for each tree from the pipeline. (The roots of large trees can present a significant safety hazard when wrapped around buried pipes; particularly if the tree subsequently is blown over or falls over causing damage to the pipeline. ((Guidelines are attached)). 8. NGN would want to agree with the developer, any required pipeline protection, should any access points be incorporated over the pipeline (i.e. either Temporary for construction or Permanent street or road access). A load assessment will need to be carried if vehicles over 5 tonne will be crossing the pipeline. Such protection for vehicular crossing points is likely to include a specifically designed concrete plinth. In this instance, NGN would be willing to agree tangential or even offset, permanent pipeline road crossing points, so long as any required pipe protection was to an NGN approved design and provided by the developer. (we would expect the developer to include for NGN's design approval process). Depending on the Pipeline material, roadways constructed to Highway Adoptable standards may not require plinth protection.	

Examination Ref. No.	Comments from Relevant Representations	Response to Relevant Representation

9. We would also want to agree any safety precautions to be adhered to by **any third parties** carrying out **ground works** in close proximity to our High Pressure Pipelines at any point along their length. This includes the laying and positioning of services as they cross the pipe(s), or placed within the easements.
It also includes any Bore Holing.

Please see attached document " Pipeline Safety Information: requirements for third parties"
Prior to groundworks; Existing location & depth of cover must be confirmed by on site measurement by our appointed representative.

(We offer a free service ((Mon /Fri x reasonable notice)) of locating **our STEEL HP / IP pipes** accurately and providing safety related advice and instruction as necessary, hence, please get back to me if you require this service. We can often provide accurate depth of cover measurements at the same time.

10. Please confirm that no explosive Blasting Techniques will be utilised during the construction period.

11. The pipeline must not be exposed during construction unless the required assessments / supports are provided and agreed with NGN. As per Pipeline safety Regulations 1996;

Regulation 15 – No person shall cause such damage to a pipeline as may give rise to a danger to persons.
(70) It is important that the location of onshore pipelines, and in particular underground pipelines, is considered when carrying out building, excavation or dumping or other such work, as such activities may either cause damage to pipelines or deny access to them for maintenance purposes.

12. **Population Density : "H" type areas where the population density exceeds 30 persons / Hectare**
As a gas network and Pipeline operator, Northern Gas Networks is obliged to adhere to the Gas Industry Recommendations as set out in the "Institution of Gas Engineers and Managers" publication IGEM /TD1/Ed6.
In this updated document, there is a new clause relating to assessing the safety ramifications for increased population density within a certain distance of any High Pressure pipeline and is to identify any location near the pipeline where the population density has reached 30 people / hectare (Known as "H type" area designation for "High Contingency").

Any Gas Transporter will be expected to abide by the new rules, and this places an onus on Northern Gas Networks to ensure that population density increases are addressed in order to try and restrict population growth in the vicinity of the pipeline and if possible, to maintain the "below 30 people / Hectare" ruling. (or carry out a safety evaluation).

Examination Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
	Can you confirm that the population will not exceed 30 people per hectare during the development and there after?	

Environment Agency

Table 2-3. Applicant's Responses to Relevant Representations – Environment Agency

RR Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
RR-107	These relevant representations contain an overview of the project issues which fall within our remit. They are given without prejudice to any future detailed representations that we may make throughout the examination process. We may also have further representations to make when supplementary information becomes available in relation to the project.	The Applicant notes this comment.
RR-107	We have reviewed the draft DCO, Environmental Statement (ES) and supporting document submitted to the Planning Inspectorate on 21 November 2023 and accepted on 19 December 2023, as part of the above application. We are pleased that some of the concerns and issues raised by the Environment Agency during pre-application consultation have been considered and addressed.	The Applicant notes this comment.
RR-107	We can confirm at this stage that we consider the ES provides a satisfactory assessment of the scheme with relation to flood risk, groundwater, land and water, ecology, waste and landfill. The mitigation and enhancement measures identified for the construction and development are considered appropriate. Please note that this is subject to the modelling completed to inform the application being signed off as being fit for its intended purpose and that discussions are ongoing regarding this matter. We currently anticipate the issues around modelling are resolvable.	The Applicant notes that the EA considers the mitigation and enhancement measures identified in the ES in relation to flood risk, groundwater, land and water for the construction and development of the Scheme as set out in Chapter 9: Flood Risk, Drainage and Water Environment, ES Volume 1 **[APP-061]** to be appropriate. These measures are also set out in the Framework CEMP **[APP-238]** and Framework OEMP **[APP-239],** which will inform detailed management plans which will need to be approved post consent prior to construction with the relevant local authorities, and are secured by a requirement in Schedule 2 to the draft DCO **[AS-008].** A meeting was held on 14 April 2024 with the EA where the Applicant agreed to carry out checks on the flood modelling and close out EA comments. No request was made to re-run the flood model.
RR-107	We note from the application that the Applicant is seeking to disapply the Environmental Permitting (England and Wales) 2016 ("the EPR") and has included Protective Provisions to this effect within Schedule 14. However, we are unable at this stage to confirm that we are content to disapply the provisions of the Environmental Permitting Regulations (England and Wales) 2016 ("the EPR"), which relate to permits for flood risk activities. Further information on this is provided below.	The Applicant notes this comment and intends to work with the Environment Agency to agree the approach to, and scope of, the disapplication of Regulation 12 of the Environmental Permitting (England and Wales) Regulations 2016. The Applicant notes the recent guidance "Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects" which confirms *"The presumption should be therefore that where an applicant proposes a provision within their DCO to remove a requirement for a prescribed non-planning consent to be granted by the relevant body, the body that would normally be responsible for granting this consent is expected to make every effort to agree to the proposal. Such a body should only object to the inclusion of such provision with good reason, and after careful consideration of reasonable alternatives."*
RR-107	**Draft DCO- Schedule 2 – Requirements** We are supportive of Requirements 3, 5, 9, 11, 12 & 18.	The Applicant notes this comment.
RR-107	<u>Requirement 11</u> We are supportive of the inclusion of Requirement 11. We note that a framework Construction Environmental Management Plan (CEMP) (Doc Ref: EN010143/APP/7.7) has been provided which includes measures to take into account the impacts of flood risk and to minimise these. Also, that the works will be undertaken in accordance with best practice. The CEMP recognises that there may be the need for secondary permissions such as flood	The Applicant notes that the EA is supportive of the inclusion of Requirement 11 in the draft DCO **[AS-008],** which states that no part of the authorised development may commence until a detailed CEMP has been submitted and approved by the relevant planning authority. Mitigation measures for trenchless crossings of watercourses are stated within the Framework CEMP **[APP-238]** and secured by a requirement in Schedule 2 of the Draft DCO **[AS-008].** This includes the commitment from the Applicant to seek information from

RR Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
	risk activity permits (page 45). It also includes environmental measures to manage the impacts of flood risk (Pages 57-59). There are a number of activities of interest to us through the construction activities given the interaction with watercourses identified as 'main rivers' and also their associated floodplains. The CEMP the potential impacts of installing cables under a main river and commits to using trenchless technology to cross a main river. These are to be a minimum of 5m below bed level of a main river – please note that the crossing should continue at the required minimum depth beneath any defences. We are supportive that the final depth will be based on site specific risk assessment and construction of the defences themselves. We strongly recommend the Applicant enters detailed discussion with us regarding the main river crossings in order to determine the required depths beneath the main rivers Ouse & Derwent and their related defences.	the Environment Agency on the construction details of the flood defence embankments that may need to be crossed. This will inform the approach for directional drilling beneath the Rivers Ouse and Derwent and associated flood defences. Following an information request from the Applicant, the Environment Agency provided further information on the embankments of the Esk and Derwent catchment and the Ouse catchment. The Environment Agency also noted there is no as built or specific information regarding the flood embankments affected in the Ouse catchment due to their age. The Applicant will continue to engage with the Environment Agency throughout the detailed design stage of the Scheme.
	We are pleased to see that existing crossings will be used where possible, and that where new crossings are required that they will be of an open span design, and that there will be no new culverts as part of the scheme.	The Applicant notes this comment.
RR-107	<u>Requirement 18</u> We are supportive of the inclusion of requirement 18 regarding decommissioning and restoration, which makes reference to the decommissioning of the site at the end of its lifetime. A Framework Decommissioning Environmental Management Plan (DEMP) is included (Doc Ref: EN010143/APP/7.9) with the details of the sequence and programme of decommissioning to be provided in the detailed DEMP. It includes a consideration of flood risk and acknowledges the possible requirement for the need of further permissions (such as. flood risk activity permits). Works will again be undertaken in accordance with good practice guidance, and measures to manage flood risk during decommissioning are included. We note that some infrastructure may be left in place to minimise disturbance. This includes assets that could remain in place below riverbeds and below existing flood infrastructure. We would like to highlight that in some locations the flood defences in situ are likely to require some works over the lifetime of the development. The EA have general concerns if infrastructure remains in situ, with respect to degradation, subsidence, theft and vandalism. This aspect may benefit from ongoing discussions and clarification on the CEMP and DEMP as new understanding and/or guidance becomes available.	The Applicant notes that the EA is supportive of the inclusion of Requirement 18 in the draft DCO **[AS-008]** which sets out the requirement for decommissioning to commence no later than 40 years following the date of final commissioning, and that the undertaker must submit a decommissioning management plan to the relevant planning authority within 12 months of the date that the undertaker decides to decommission any part of the authorised development. A Framework DEMP **[APP-240]** setting out the decommissioning strategy is included with the Application. A detailed DEMP (which must substantially accord with the Framework DEMP **[APP-240])** will need to be approved prior to decommissioning with the relevant local authorities and this is secured by a requirement in Schedule 2 to the Draft DCO **[AS-008].**
RR-107	**Part 2 Section 6 (f) & Schedule 14 Part 5 – disapplication of EPR / protective provisions for the EA** The applicant requests disapplication of the provision of the Environmental Permitting Regulations (England & Wales) 2016 (EPR), which relate to permits for flood risk activities. The applicant has included a suggested form of protective provisions for the benefit of the Environment Agency.	The Applicant intends to work with the Environment Agency to agree the approach to, and scope of, the disapplication of Regulation 12 of the Environmental Permitting (England and Wales) Regulations 2016. The Applicant awaits any comments from the Environment Agency on the form of protective provisions currently included in the draft the DCO **[AS-008]** (Schedule 14, Part 5). As above, the Applicant notes the recent guidance "Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects" which confirms *"The presumption*

RR Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
	We are currently considering whether or not it would be appropriate to agree to this disapplication of EPR. We do not normally agree to disapplication without protective provisions in our preferred form being included in the DCO.	*should be therefore that where an applicant proposes a provision within their DCO to remove a requirement for a prescribed non-planning consent to be granted by the relevant body, the body that would normally be responsible for granting this consent is expected to make every effort to agree to the proposal. Such a body should only object to the inclusion of such provision with good reason, and after careful consideration of reasonable alternatives."*
RR-107	**Environmental Permit: Flood Risk Activities** It is possible that some works would require a Flood Risk Activity Permit under the 2016 Environmental Permitting Regulations. This includes flood risk activities, as defined by the 2016 Environmental Permitting Regulations, where a permit will be required for any works, in, under or over a main river or defence, or, are within 8m (16m if tidal) from the top of bank of a main river, or toe of a defence. A permit is separate to and in addition to any planning permission / DCO granted. Further details are available at https://www.gov.uk/guidance/flood-risk-activities-environmental-permits We would like to see Flood Risk Activity Permits referenced in the Consents and Agreements Positions Statement (Doc Ref: EN010143/APP/3.3 as at this stage disapplication has not been agreed and it is possible that Flood Risk Activity Permits will be required. We have concerns regarding the main river crossings under the rivers Ouse and Derwent, where the applicant is looking to cross using trenchless techniques for the grid connection to Drax Power Station. It is likely that despite using trenchless techniques the works would be considered high risk. We have areas of concern around the conditions of some flood risk management assets and therefore it is likely that we would require monitoring to be undertaken to ensure that there is no detrimental impact on flood defences (to ensure that their standard of protection is maintained). We also need to ensure that the works do not impact our ability to carry out future maintenance or improvement works. We would therefore strongly recommend further discussion regarding this as detailed in our PEIR response, dated 16 June 2023 (OREF RA/2023/145823/01-L01).	The Applicant intends to work with the EA to agree the approach to, and scope of, the disapplication of Regulation 12 of the Environmental Permitting (England and Wales) Regulations 2016. The Applicant awaits any comments from the Environment Agency in the form of protective provisions currently included in the draft the DCO **[AS-008]** (Schedule 14, Part 5). The draft DCO **[AS-008]** states in Part 2(6)(1)(f) that regulation 12 (requirement for environmental permit) of the Environmental Permitting (England and Wales) Regulations 2016(f) in respect of a flood risk activity only does not apply in relation to the construction of any work of the carrying out of any operation requirement for the purposes of the authorised development.
RR-107	**Environmental Statement** Volume 1 Chapter 9 Flood Risk, Drainage & Water Environment (Doc Ref EN010143/APP.1) and Volume 2, Appendix 9-3: Flood Risk Assessment (Doc Ref: EN010143/APP/6.2) We note that this chapter identifies and proposes measures to address the potential impacts and likely significant effects of the scheme on flood risk, drainage and the water environment during construction operation and decommissioning phases. Overall, we are satisfied that the Draft DCO adequately mitigates flood risk in relation to the permanent and temporary structures. We are pleased to see that comments made at PEIR	The Applicant notes this comment and looks forward to ongoing discussions with the Environment Agency around the design of the Scheme and flood risk mitigation. The protective provisions at Part 5 of Schedule 14 of the draft DCO **[AS-008]** require the Applicant to obtain the prior approval of the Environment Agency to plans of specified works before commencing construction of those works. This would include the plan of works for crossing of main rivers.

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	stage have been incorporated into both the Chapter 9 and the Flood Risk Assessment (FRA). Consideration has been given to all sources of flood risk, including surface water, possible flow routes and groundwater. The grid connection cable will be installed under both the Rivers Derwent and Ouse, both classified as Main rivers and therefore potentially affecting those watercourses and their associated infrastructure. With respect to the permanent infrastructure, this will be installed a minimum of 5m below hard bed level (section 9.6.18). Where flood defences are present the minimum depth of 5m must apply to the outermost toe of those defences. We do note that final depths are to be based on site specific risk assessments. It should be noted that the optimal depth will need to be subject to ongoing discussion for each location (please see earlier comments regarding the crossings under the heading of 'Part 2 Section 6 (f) & Schedule 14 Part 5 –disapplication of EPR / protective provisions for the EA'). It is noted that any launch or reception pits for the trenchless crossings are to be a minimum 16m from the landward toe of a defence. We note that the depths and construction of the flood defence embankments (9.7.121) will be identified through liaison with the Environment Agency and that the directional drilling is to be at a sufficient depth to not compromise those assets. We would recommend ongoing discussion regarding these works, as we would also need to ensure that the directional drilling does not compromise our ability to carry out any required maintenance or possible future improvement works. We note that existing ground levels are to be maintained where possible and kept as close to existing where not. We are pleased to see that whilst the scheme's lifetime is to be 40 years, that it has been assessed for 75 years, and that a credible maximum scenario has also been considered and is detailed within the FRA, along with appropriate climate change allowances (including the impacts of tidal flooding). We support the inclusion of the flood risk mitigation requirements 9.6.40 to 9.6.46. Which includes the provision of compensatory storage – the design of which is to be agreed in writing at detailed design stage. With particular reference to the FRA, we are in ongoing discussions with the applicant with respect to the modelling that has been carried out to inform the FRA. We consider the proposed mitigation included within the FRA to be acceptable and appropriate, but this is subject to the modelling being approved as being fit for the purpose of its intended use*. The FRA considers risk to and risk arising from the development, for both the Solar PV site and for the grid connection corridor. As mentioned, it also proposes mitigation to ensure that the development utilises appropriate mitigation to deal with the possible impacts of flood risk to the development, and also measures to ensure that the development does not increase or exacerbate risk to others (see * above).	

RR Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
RR-107	**Environmental Statement - Chapter 8: Ecology 8.6 Embedded Mitigation** The embedded mitigation is suitable and has identified all potential adverse effects, and devised ways to eliminate or greatly reduce them e.g. Horizontal Directional Drilling (HDD) will safeguard aquatic habitats, and tunnelling under hedges will preserve them.	The Applicant notes that the EA states that the embedded mitigation set out in Chapter 8: Ecology, ES Volume 1 **[APP-060]**, as well as the Framework CEMP **[APP-238],** Framework OEMP **[APP-239]** and Framework LEMP **[APP-246]**, which will inform detailed management plans which will be secured by requirements in Schedule 2 of the draft DCO **[AS-008],** is suitable. Chapter 8: Ecology, ES Volume 1 **[APP-060]** sets out that there are no residual significant adverse effects that have been identified during construction, operation or decommissioning of the Scheme. As noted by the EA, the chapter states that the use of HDD will safeguard aquatic habitats, and tunnelling under hedges will preserve habitats for mammals.
RR-107	<u>Vegetation Clearance and Building Works</u> 8.6.13 An ecologist should be on site and overseeing any vegetation clearance in the bird nesting season. This requires further work and alteration to the current wording.	As set out in Chapter 8: Ecology, ES Volume 1 **[APP-060]** and the Framework CEMP **[APP-238]** which will inform a detailed CEMP which will be secured by a requirement in Schedule 2 of the draft DCO **[AS-008],** vegetation clearance will be undertaken in advance of construction and at an appropriate time of year to avoid the nesting bird period. Where vegetation clearance cannot avoid the inactive season and is proposed within the nesting bird period, these will be checked for the presence of any nests by a suitably experienced ornithologist, prior to vegetation removal, and if active nests are found, then appropriate buffer zones would be put in place and the area monitored until the young birds have fledged. To clarify, an ornithologist is an ecologist that specialises in birds.
RR-107	8.6.15 - Installing Barn Owl nest boxes will be a good addition to the ecological benefits arising from the site.	The Applicant notes this comment.
RR-107	8.6.21 – We are happy to see that lighting on the site will conform to best practice guidelines; this should, reduce any adverse impact upon nocturnal wildlife.	The Applicant notes this comment.
RR-107	8.6.24 – For the crossing of larger drains, if over pumping is required, this will need a 2mm diameter mesh screen on the intake to comply with the Eel Regulations to prevent the entrapment of elvers. Please amend the fish section on page 8-623.	The Applicant accepts that if over pumping is required for the crossing of larger drains, a 2 mm diameter mesh screen on the intake to comply with the Eel Regulations is required. This will be added to the mitigation and enhancement measures in Table 3 within the Framework CEMP **[APP-238**], in relation to the clearance or damage of habitat to facilitate construction – resulting in temporary or permanent reduction in habitat extent and potential direct and indirect effects on associated species. A detailed CEMP (which must substantially accord with the Framework CEMP **[APP-238])** will need to be approved post consent prior to construction with the relevant local authorities and this is secured by a requirement in Schedule 2 to the Draft Development Consent Order **[AS-008].**
RR-107	8.6.29 - Invasive Non-native Species (plants) – the applicant needs to develop an eradication plan. Himalayan balsam easy to control by pulling, strimming, or spraying (before it seeds seed), the New Zealand Pygmyweed (Crassula helmsii) probably requires burial or very careful physical removal	Terrestrial and aquatic INNS have been identified within and in the vicinity of the Site through site survey and desk-based study. See Chapter 8: Ecology, ES Volume 1 **[APP-060],** Appendix 8-2, ES Volume 2 **[APP-083]** and Appendix 8-3, ES Volume 2 **[APP-084].** The following mitigation measures are included in the Framework CEMP **[APP-238].** A detailed CEMP (which must substantially accord with the Framework CEMP **[APP-238])** will need to be approved post consent prior to construction with the relevant local authorities and this is secured by a requirement in Schedule 2 to the Draft Development Consent Order **[AS-008]**

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		• Pre-construction surveys will be undertaken where required to provide an update on the presence and location of any INNS that could be impacted by the Scheme, the findings of which will inform the implementation of measures to prevent their spread. A Biosecurity Plan will be produced prior to construction which will set out procedures to ensure that no invasive species are brought onto the Site, exported out of the Site or spread within it (e.g. Wildlife and Countryside Act 1981 (as amended) Schedule 9 species. In the event that any future infestations of INNS are identified prior to and or during the development process, exclusion zones will be established around them, and a suitably qualified ecologist contacted for advice as required. Site / species specific method statements (or similar will be prepared as required).
RR-107	**8.8 Additional Mitigation, Enhancement, and Monitoring** <u>Additional Mitigation</u> Ecology Mitigation Area (1g and 1h) We welcome the measures detailed in the Additional Mitigation section, as stated, these will off-set any potential adverse effects from the development.	The Applicant notes that the EA welcomes the additional mitigation set out in Chapter 8: Ecology, ES Volume 1 **[APP-060],** which are also set out in the Framework CEMP **[APP-238].** A detailed CEMP (which must substantially accord with the Framework CEMP) will need to be approved post consent prior to construction with the relevant local authorities and this is secured by a requirement in Schedule 2 to the draft DCO **[AS-008].** The additional mitigation includes maintained agricultural land and the creation of permanent wet/damp grassland part of the Ecology Mitigation Areas 1g and 1h, portable noise fencing, habitat enhancement measures and monitoring.
RR-107	**Volume 2, Appendix 9-2: Water Framework Directive (WFD) Assessment** We concur with the conclusion of the WFD Assessment that the scheme throughout its life will not cause deterioration in any WFD quality element for any waterbody, nor will it prevent future improvement, including the achievement of the wider WFD objectives in the Humber River Basin Management Plan, or mitigation measures developed to achieve Good status.	The Applicant notes that the EA concurs with the conclusion of the WFD Assessment (Appendix 9-2: WFD Assessment, ES Volume 2 **[APP-095])**.
RR-107	**Biodiversity Net Gain Assessment Report Document Reference: EN010143/APP/7.11** We are pleased to see that the project is predicted to result in a net gain of 80.42% for area-based habitat units, and a net gain of 10.09% for watercourse units. We would like to see that the net gain of 3.89% in hedgerow units can be increased to meet the 10% ambition for this habitat type**.**	An updated Biodiversity Net Gain Assessment has been submitted at Deadline 1 which predicts that predicted to result in a net gain of 80.42% for area-based habitat units, a net gain of 10.30% for hedgerow units, and a net gain of 10.09% for watercourse units. The Framework LEMP **[APP-246]** sets out that the Applicant commits to achieving a minimum 10% BNG for all units. .
RR-107	**Habitats Regulations Assessment Document Reference: EN010143/APP/7.12** We have reviewed the Habitats Regulations Assessment for the various European sites: River Derwent SAC, Lower Derwent Valley SPA, SAC, Ramsar site, Humber Estuary SPA, SAC, Ramsar, Skipwith Common SAC, Thorne and Hatfield Moors SPA; and Thorne Moor SAC. We are satisfied that the measures in it will prevent any Likely Significant Effect on the interest features of these sites.	The Applicant notes that the EA accepts the measures set out in the HRA Report **[APP-244]**, which are also set out in the Framework LEMP **[APP-246]** which will inform a detailed LEMP and be secured by a requirement in Schedule 2 of the draft DCO **[AS-008].** These include the creation of permanent wet/damp grassland and the provision of suitable arable habitat within the Ecology Mitigation Areas 1g and 1h, which will prevent any likely significant effects on the interest of features of the River Derwent SAC, Lower Derwent Valley SPA, SAC, Ramsar site, Humber Estuary SPA, SAC, Ramsar, Skipwith Common SAC, Thorne and Hatfield Moors SPA; and Thorne Moor SAC.
	Groundwater and Contaminated Land/ Land and Water comments	The Applicant notes this comment.

RR Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
	We are pleased that all previous comments relating groundwater and contaminated land have been considered, and we have no objections from a groundwater, contaminated land and land and water perspective at this stage.	
RR-107	We do have the following comments to make: **Chapter 9: Flood Risk, Drainage and Water Environment** We note that delivery of a detailed Surface Water Drainage Strategy informed by infiltration testing is secured as a requirement of the DCO. We welcome that standalone, site specific hydraulic fracture risk assessments will be produced prior to drilling the cable crossings.	The Applicant notes this comment.
RR-107	**Table 4. Flood Risk, Drainage, and Water Environment** We are pleased to see our comments have been included, and acknowledgment has been made to the potential requirement for the need to apply for permits for groundwater activity/abstraction licences etc. We understand that the appointed contactor will carry out works in accordance with any permits in place and is subject to these being granted. Please refer to the additional 'Environmental Permitting Guidance' can be found at:https://www.gov.uk/guidance/check-if-you-need-an-environmental-permit. We welcome that temporary drainage will be monitored throughout construction and that specific details will be confirmed in detailed CEMP. We would like to review the Water Management Plan (WMP) when available.	The Applicant notes this comment. The WMP will be an appendix to the detailed CEMP, as secured in the DCO via Table 4 of the Framework CEMP **[APP-238]**.
RR-107	**Table 14. Ground Conditions** We welcome that the potential for unexpected contamination has been included. If, during development, contamination not previously identified is found to be present at the site then a remediation strategy detailing how this contamination will be dealt should be submitted to the relevant planning authority and a verification plan, and subsequent verification report should be produced. We recommend that developers should: • Follow the risk management framework provided in Land Contamination: Risk Management, when dealing with land affected by contamination • Refer to our Guiding principles for land contamination for the type of information that we require in order to assess risks to controlled waters from the site - the local authority can advise on risk to other receptors, such as human health. • Consider using the National Quality Mark Scheme for Land Contamination Management which involves the use of competent persons to ensure that land contamination risks are appropriately managed • Refer to the contaminated land pages on gov.uk for more information.	The Applicant notes this comment.
RR-107	**Waste Management** We have no objection to the application from a waste management perspective. Should you require any additional information, or wish to discuss these matters further, please contact the Yorkshire Waste Team at yorkshirewaste@environment-agency.gov.uk	The Applicant notes that the EA has no objection to the application from a waste management perspective, and therefore accepts the assessment of waste in Chapter 16: Other Environmental Topics, ES Volume 1 **[AS-068]**.

RR Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
RR-107	**Landfill** We have no objection to the application from a landfill perspective. We confirm there are no active permitted landfills or deposits for recovery permits within the development area. A single 'historic' landfill appears to be adjacent to the grid connection corridor at grid ref SE66820 27982 (full details of the site are included below). The Environment Agency has no regulatory role with historic landfills and the developer is advised to contact the local authority and or landowner for more information on any risk posed by installing infrastructure on or close to the site in question.	The Applicant notes that the EA has no objection to the application from a landfill perspective, and therefore accepts the assessment of waste in Chapter 16: Other Environmental Topics, ES Volume 1 **[AS-068]**.

Historic Landfill Dataset reference	EAHLD05289
Site Name	New Road Landfill Site
Site address	Drax Power Station, New Road, Drax, North Yorkshire
Waste Management Licence number	68604
REGIS Reference	YP4/L/CEG001
WRC Reference	2700/0101
BGS Reference	n/a
Site Reference	CEG001, 0700/NYCC/075
Licence holder	n/a
Licence holder address	Drax Power Station, New Road, Drax, Selby, North Yorkshire
Site operator name	Central Electricity, Generating Board, North Eastern Region

RR-107	**Book of Reference** We have reviewed the Book of Reference and have the following comments. The following details of current tenants (occupiers) on EA land entries have been omitted from the book of reference.		The Applicant issued a number of requests for information in order to gain details for inputting into the Book of Reference **[AS-012]**. The Applicant received no response from the EA and were therefore unable to validate if any further interests were in occupancy of the lands in question. The current tenants (occupiers) on EA land entries identified in the EA's relevant representation can be added to the Book of Reference, however further details of the tenants and agreements in place are required from the EA. The Applicant has requested these from the EA and has written to the farm business tenancies directly for information. The Book of Reference **[AS-012]** can then be updated to reflect these if required.

Plot no	EA plot reference	Type of occupancy	Tennant/ Occupier
18/107	River Derwent Plot 2	seasonal grazing licence	
18/108	River Derwent Plot 2	seasonal grazing licence	
18/109	River		
18/110	River Derwent Plot 21	Farm Business Tenancy	Mr J Bramley, Woodhall, South Duffield, Selby YO8 6TG
21/140	River Ouse Plot 8	Farm Business Tenancy	Mr RA Nicholson, Sickle Croft Farm, Thorpe in Balne, Doncaster DN6 0DZ
21/141	River		
21/142	River Ouse Plot 9	Farm Business Tenancy	Mr JS Spetch, Ship Farm, Long Drax, Selby YO8 8NH

Network Rail

Table 2-4. Applicant's Responses to Relevant Representations – Network Rail

RR Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
RR-270	APPLICATION BY ASSOCIATED BRITISH PORTS FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR EAST YORKSHIRE SOLAR FARM LIMITED Planning Inspectorate Reference Number: EN010143 Section 56 Planning Act 2008: Relevant Representation of Network Rail Infrastructure Limited This is the section 56 representation of Network Rail Infrastructure Limited (Network Rail) provided in respect of East Yorkshire Solar Farm Limited's (Applicant) application for a Development Consent Order (Order) to authorise the comprise the construction, operation (including maintenance) and decommissioning of ground mounted solar photovoltaic (PV) panel arrays which will generate electrical energy from the sun. The Scheme includes underground cabling to connect to the national electricity transmission network at National Grid's Drax Substation; underground cabling between the areas of solar PV panels; areas of landscaping and biodiversity enhancement; and other associated development (Scheme).	The Applicant notes this comment. Although the Applicant would wish to point out that the Application was made by East Yorkshire Solar Farm Limited and not Associated British Ports.
RR-270	Network Rail is a statutory undertaker and owns, operates and maintains the majority of the rail infrastructure of Great Britain. The Book of Reference (BoR) recognises plot 15 (Plot), identifiable on Sheet 15 of the Land Plans, as land owned by Network Rail in respect of which compulsory acquisition powers to acquire new rights are sought (Compulsory Powers).	The Applicant and Network Rail have now concluded a voluntary Option Agreement for the land rights required. The Applicant therefore considers that with the agreement of this voluntary Option Agreement the compulsory acquisition rights in the draft DCO **[AS-008]** are appropriate.
RR-270	Network Rail notes that the Compulsory Powers are sought in relation to operational railway land forming part of the operational railway being the Hull to Selby Line (Railway Line). Network Rail objects to the inclusion of the Plot in the Order and to the acquisition of Compulsory Powers in respect of it. The Plot constitutes land owned by Network Rail for the purpose of its statutory undertaking and, accordingly, this representation is made under section 56 and sections 127 and 138 of the Planning Act 2008.	The Applicant has agreed a form of protective provisions for the benefit of Network Rail Infrastructure Limited, which have been included in Part 6 of Schedule 14 to the draft DCO submitted at Deadline 1. The Applicant and Network Rail Infrastructure Limited have also agreed a form of framework agreement between the parties, which awaits signature. The Applicant has also obtained the necessary business and technical clearance from Network Rail Infrastructure Limited. The Applicant and Network Rail have now also concluded a voluntary Option Agreement for the land rights required.
RR-270	Network Rail also objects to all other compulsory powers in the Order to the extent that they affect, and may be exercised in relation to, Network Rail's property and interests. The Applicant also proposes to access a compound via Rowlandhall Lane to carry out construction works including the use of tractor-trailers. Network Rail's engineers are determining the extent to which any additional works or mitigation measures are required to ensure the safety of the Rowlandhall Level Crossing and that HGV routing will not be conducted in this area. In order for Network Rail to be in a position to withdraw its objection Network Rail requires: (a) agreements with the Applicant that regulate: (i) the manner in which rights over the Plot and any other railway property are acquired and the relevant works are carried out including terms which protect Network Rail's	Please see response above. The Applicant has prepared a Framework CTMP **[APP-113]**. At Section 3.4.7 there is explanation that no HGVs will use the Rowlandhall Lane Level Crossing. A detailed CTMP will be prepared which will need to be approved post consent prior to construction by East Riding of Yorkshire Council and North Yorkshire Council (the relevant local authorities) in consultation with Network Rail. This must be in accordance with Framework CTMP **[APP-113]** and this is secured by a requirement in Schedule 2 to the Draft Development Consent Order **[AS-008]**. Compound C (access point located approximately 800 m south of the Rowlandhall Lane Level Crossing on Rowlandhall Lane) will be serviced by a maximum of 14 two-way daily Tractor-Trailer vehicles bringing materials from Compound B, therefore only these vehicles will be required to use the Rowlandhall Lane to gain access. The Framework CTMP **[APP-113]** has

RR Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
	statutory undertaking and agreement that compulsory acquisition powers will not be exercised in relation to such land; and (ii) the carrying out of works in the vicinity of the operational railway network to safeguard Network Rail's statutory undertaking; and (b) the inclusion of protective provisions in the DCO for its benefit. Network Rail welcomes the fact that there are protective provisions for its benefit in the Order and, if necessary, will provide detailed comments on, and amendments to, the protective provisions when it submits its detailed Written Representation. To safeguard Network Rail's interests and the safety and integrity of the operational railway, Network Rail objects to the inclusion of the Compulsory Powers and any other powers affecting Network Rail in the Order. Network Rail requests that the Examining Authority treat Network Rail as an Interested Party for the purposes of the Examination.	been amended at section 3.4 to include the commitment that the Applicant will consult Network Rail prior to any proposed use of the Rowlandhall Lane Level Crossing and that all tractor-trailer vehicles that are categorised as large or slow in accordance with existing signage must call the signaller prior to crossing Rowlandhall Lane Level Crossing and comply with any instructions given to them. This is being submitted into examination at Deadline 1. Based on the rural / agricultural nature of the local area, these types of vehicles frequently use the local road network and also level crossings where required.

UK Health Security Agency

Table 2-5. Applicant's Responses to Relevant Representations – UK Health Security Agency

RR Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
RR-369	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 the comments raised by us at the statutory consultation stage (on 29/09/2023) have been addressed. In addition, we acknowledge that the Environmental Statement (ES) has not identified any issues which could significantly affect public health. UKHSA and OHID are satisfied with the methodology used to undertake the environmental assessment. Potential impacts arising from historic ground contamination have been considered in the draft development consent order and there is a requirement that a scheme to assess and manage these impacts, be agreed with the relevant local authority in consultation with the Environment Agency, as the relevant regulatory authorities with regards to contaminated land. 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. Please do not hesitate to contact us if you have any questions or concerns.	The Applicant notes that the UKHSA/OHID accepts that their comments raised at Statutory Consultation have been addressed, and agree that the ES has not identified any issues which could significantly affect public health. An agreed and signed SoCG with the UKHSA/OHID has been submitted at Deadline 1. Chapter 14: Human Health, ES Volume 1 **[APP-066]** provides an assessment of the Scheme on human health, which concludes that there are no likely significant effects to public health. Although scoped out of the human health assessment presented in Chapter 14: Human Health, ES Volume 1 **[APP-066]**, potential impacts of electromagnetic fields are presented in section 16.8 of Chapter 16: Other Environmental Topics, ES Volume 1 **[AS-016]** and this concludes that no likely significant effects to residential receptors or users of PRoW. Potential impacts of the Scheme on human receptors with regard to ground conditions are also presented in Section 16.4 of Chapter 16: OtherEnvironmental Topics, ES Volume 1 **[AS-016].** The assessment concludes that, the Scheme is not considered to pose an unacceptable risk to human health or the environment either during construction, during operation or decommissioning, and no likely significant effects are anticipated. This is on the assumption that implementation of the recommendations of the Generic Quantitative Risk Assessment (to be completed post-consent), as set out in the Framework CEMP **[APP-238]**, as secured by Requirement 11 to Schedule to of the draft Development Consent Order **[AS-009]**, are implemented as part of the detailed CEMP, along with environmental design and management measures. The Applicant notes that the UKHSA/OHID is satisfied with the methodology used to undertake the EIA as set out in section 14.4 of Chapter 14: Human Health, ES Volume 1 **[APP-066]** and Sections 16.4 Ground Conditions and 16.8 Electric and Electromagnetic Fields in Chapter 16: Other Environmental Topics, ES Volume 1 **[AS-016]** Table 14 of the Framework CEMP **[APP-238]** sets out mitigation measures to reduce risks to human health associated with contaminated land. A detailed CEMP will need to be agreed with the relevant planning authorities prior to construction, and this is secured through requirement 11 of the draft DCO **[AS-008]**.

Historic England

Table 2-6. Applicant's Responses to Relevant Representations – Historic England

RR Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
RR-146	Response to: Notice of acceptance of an application for a Development Consent Order, East Yorkshire Solar Farm (Reference No. EN010143) ON BEHALF OF THE HISTORIC BUILDINGS AND MONUMENTS COMMISSION FOR ENGLAND (HISTORIC ENGLAND) ("HBMCE") Application by East Yorkshire Solar Farm Limited. The Historic Buildings and Monuments Commission for England is generally known as "Historic England". Historic England was established under the National Heritage Act 1983 and is the lead body for the heritage sector and the Government's principal adviser on the historic environment. It is a statutory consultee on all Nationally Significant Infrastructure Projects. We have been notified by you of the acceptance of the DCO application and wish to Register as an Interested Party. Historic England's interest in this scheme is focused on the following designated and non-designated but nationally important heritage assets:	The Applicant notes this comment.
RR-146	1) Archaeology: We have reviewed the assessment of the archaeological resource identified in the applicant's Cultural Heritage Desk-Based Assessment (ES vol 2, Appendix 7-2, Document Reference: EN010143/APP/6.2, November 2023). There are no Scheduled Monuments within the site boundary of the Scheme area. There are several Scheduled Monuments outside the Scheme area, but within the 1km and 3km buffer zone areas, and therefore considered to be within the setting of those Scheduled Monuments. The applicant states that because little archaeological research has been carried out in the area, with little result, the archaeological potential is therefore 'low' or 'negligible' (section 6.1). We do not consider that this is the case. NPS EN1 – Overarching National Policy statement for Energy makes it clear that the construction, operation and decommissioning of energy infrastructure has the potential to result in adverse impacts on the historic environment above, at and below the surface of the ground. It goes on to set out that the applicant should undertake an assessment of any likely significant heritage impacts of the proposed development, and as a minimum the applicant should have considered the relevant Historic Environment Record and assessed the heritage assets themselves using expertise where necessary according to the proposed development's impact, and where a site includes or available evidence suggests it has the potential to include heritage assets with an archaeological interest, the applicant should carry out appropriate desk based assessment and if this is insufficient a field evaluation impact. It is clear that there are archaeological deposits in the area, but the assessment does not provide the necessary detail. For example, the section on the post-medieval (6.1.8), has a focus on former field boundaries and seems to gloss over the potential for WW1 and WW2 archaeology. We would expect that further detail (assessment and analysis) is provided as to the potential for archaeological deposits in the Scheme area, thereby permitting greater understanding as to how this would be dealt with as part of the assessment of impact. Potential research themes, para 6.2.1: The suggested themes are not particularly helpful, although we recognise that the text says they will be updated. At present we consider the	The Applicant would like to clarify that section 6.1 of the Cultural Heritage Desk-Based Assessment, Appendix 7-2, ES Volume 2 **[APP-080]** does not state that because little archaeological research has been carried out in the area, with little result, the archaeological potential is 'low' or 'negligible'. The archaeological potential, which is assessed in section 6.1 as ranging from 'negligible' to 'high' for different chronological periods, has been determined by a review of the known heritage resource, including the relevant Historic Environment Record, land-use and topography, the results of stakeholder engagement and the results of archaeological field evaluation. This is stated in section 6.1.1 of the Cultural Heritage Desk-Based Assessment **[APP-080].** The results of the field evaluation, which have informed the assessment of likely impacts of the Scheme, are set out in the Geophysical Survey Report, Appendix 7-3, ES Volume 2 **[APP-081]** and the Archaeological Trial Trench Evaluation Report, Appendix 7-4, ES Volume 2 **[APP-082].** The potential for previously unrecorded heritage assets relating to WW1 and WW2 archaeology is assessed to be negligible. Heritage assets from this period are well-researched and their locations are recorded on the relevant local authority Historic Environment Record. The WW1 and WW2 assets discussed in section 4.8 of the Cultural Heritage Desk-Based Assessment **[APP-080]** are all located outside of the Order Limits and the potential for previously unrecorded assets within the Order Limits is negligible. Arising from the meeting with HE on 05.06.24, it was agreed that this information would be clarified in Section 3.4 Archaeological Baseline of the OWSI along with an additional section detailing the archaeological potential. The potential research themes listed in section 6.2.1 of the Cultural Heritage Desk-Based Assessment, Appendix 7-2, ES Volume 2 **[APP-080]** are outline. Section 6.2.1 states that these research themes will be developed and updated following the results of fieldwork surveys and consultation with the local authority archaeology officers, and will then be set out in future Written Schemes of Investigation.

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	proposed text to be a 'place holder' for more developed and relevant content. The research themes are to be updated and agreed with the Local Authority Principal Archaeologists as a matter of urgency, so that we can then better understand the possible impact and propose appropriate mitigation.	Informed by the results of the fieldwork surveys **[APP-081** and **APP-082]** and updated Trial Trench Report (Reference to be confirmed) the research themes have now been updated and are included in section 4 of the Overarching Written Scheme of Investigation for Archaeological Mitigation, which has been agreed with the relevant local authority archaeology officers and is to be submitted at Deadline 1 of the Examination.
RR-146	2) Setting and its contribution to significance: Numerous Listed Buildings and one Conservation Area (Howden) lie within the 1km and 3km buffer zones. The assessment of impact on the significance of Howden and its Minster church (5.1.8 onwards) is well-written and considered. We like the approach used to present both Chronological (4.8 onwards) and Thematic (5.1.1 onwards) assessments. This latter section addresses the points made in our original communications to the applicant about trying to assess landscape scale change and the dynamics of moving through the landscape. Although the supporting text and references to the legislation, policy and guidance identify the published setting guidance (https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/heag180-gpa3-setting-heritage-assets/), we would remind the applicant not to over-rely on views and viewpoints. The published guidance clearly states that setting is about how a place is 'experienced', but that sense of 'experience' is often missing from analyses and the assessment of significance of places. We consider that the balance in the text between 'views/viewpoints' and 'experience' is better than in many DBAs, but we would urge the applicant that when they write the statements of significance for individual places, they identify the contribution that setting makes to significance, give appropriate weight to 'experience', and identify the impact on significance and not the significance of the impact. This assessment phase (and the criteria to be used for assessment), should be a core part of current and continuing stakeholder meetings, allowing the stakeholders to judge the efficacy of the approach used before submission of any final DCO documentation.	The Applicant agrees that the experience of a heritage asset is an important component in the assessment of its heritage significance, and this forms part of the assessment process set out in the Cultural Heritage Desk-based Assessment **[APP-080]** and Chapter 7: Cultural Heritage, ES Volume 1 **[APP-059]**. In accordance with the published guidance on the Setting of Heritage Assets (https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/heag180-gpa3-setting-heritage-assets/), section 4.3 and section 5 of the Cultural Heritage Desk-based Assessment **[APP-080]** articulate the experience of individual heritage places and assets and describes how this experience contributes to their heritage significance. Section 7 of Chapter 7: Cultural Heritage, ES Volume 1 **[APP-059]** assesses potential impacts to heritage assets arising from change to their setting and also explains how and why the experience of an asset contributes to its setting and heritage significance. Refer specifically to section 7.7.32 to 7.7.35 of Chapter 7: Cultural Heritage, ES Volume 1 **[APP-059]** for an example of this assessment process.
RR-146	3) Cumulative impact: There are numerous solar farms proposed (and some consented) for the Humberhead Levels, the southern end of the Vale of York and the Vale of Holderness. These several schemes cross local authority boundaries, and represent considerable landscape scale change. There does not appear to be any assessment of the Scheme in light of the numerous other schemes in the area. It is critical to be able to understand what the impact from this scheme in conjunction with the other schemes might be. Submission of this assessment should be conducted as soon as possible.	The cumulative schemes identified in Chapter 17: Cumulative Effects and Interactions **[APP-069]** and assessed in Chapter 7: Cultural Heritage, ES Volume 2 **[APP-059]** were agreed in consultation with the relevant local planning authorities. The cumulative schemes assessed in the ES fall within a Zone of Influence (ZoI) which was also agreed with local planning authorities, and which is illustrated on Figure 17-1 **[APP-227]** and Figure 17-2 **[APP-228]** ES Volume 3. The solar schemes located at Humberhead Levels, Vale of York and Vale of Holderness are outside of the agreed ZoI and their distance from the Scheme would preclude significant cumulative effects for heritage assets. The Applicant does not consider there is a need to assess any additional cumulative schemes to those which are presented in Chapter 7: Cultural Heritage, ES Volume 1 [**APP-059]**. Historic England agreed during a meeting dated 04 June 2024 that the cumulative assessment in the ES was adequate, and the area of potential impact to be further investigated related to the magnitude of change to the landscape, and specifically the effect of incremental solar development on elements of the historic landscape, including to existing power-related infrastructure and ancillary features.

National Gas Transmission

Table 2-7. Applicant's Responses to Relevant Representations – National Gas Transmission

RR Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
RR-114	This relevant representation is submitted on behalf of National Gas Transmission Plc ("NGT") in respect of the East Yorkshire Solar Farm DCO, and in particular NGT's infrastructure and land which is within or in close proximity to the proposed Order Limits. 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. NGT has high pressure gas transmission pipelines within or in close proximity to the proposed Order Limits. These transmission pipelines form an essential part of the gas transmission network in England, Wales and Scotland: • Feeder 7 Cawood to Susworth T West • Feeder 29 Ganstead to Asselby Protection of NGT Gas Apparatus 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 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. Compulsory Acquisition Powers in respect of the Project As noted, in relation to operational apparatus, where the Applicant intends to acquire land or rights, or interfere with any of NGT's interests in land, 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 has proposed protective provisions for the benefit of gas undertakers in the standard form of Part 1 of Schedule 14 of the draft DCO which operate to protect NGT's apparatus. Notwithstanding, the Applicant is in discussions with NGT regarding a bespoke form of protective provisions to seek to address its concerns. The Applicant understands that these protective provisions, when agreed and completed, will allow NGT to withdraw its objection to the Scheme. The Applicant is confident that agreement will be reached with National Gas Transmission at an early stage of the Examination. The Applicant has shared a draft SoCG with National Gas Transmission for comment. Regarding Compulsory Acquisition, given the nature of NGT's interests in the Order land (being third party rights to apparatus), the Applicant does not require voluntary land agreement with NGT. The Applicant has committed not to compulsorily acquire any apparatus of NGT (or any other relevant statutory undertaker) as set out in paragraph 5 of Part 1 of Schedule 14 (Protective Provisions). Should a bespoke form of protective provisions be agreed between the parties, the Applicant anticipates a similar restriction on acquisition of apparatus will be included.

Canals and River Trust

Table 2-8. Applicant's Responses to Relevant Representations – Canal and River Trust

RR Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
RR-036	The Canal & River Trust ("the Trust") has previously provided comments to the applicant on the application proposals, notably with regards to the works to install caballing across the River Ouse, and wishes to register and comment as an interested party for the examination relating to the above application. The Trust's Roles and Responsibilities The Trust is a statutory party for the purposes of s.88(3) of the Planning Act 2008 ("the 2008 Act") as the Application is likely to have an impact on the River Ouse, or land adjacent to the river, where by the Trust is Navigation Authority. The Trust is a statutory undertaker for the purposes of s.127 of the 2008 Act. The Trust is Navigation Authority for the River Ouse and has a duty to maintain the river as a commercial waterway. The Trust also has environmental and recreational duties under s.22 British Waterways Act 1995 when considering proposals relating to its functions. These include consideration of effects on flora and fauna and preserving access to towing paths for the public. The Trust's charitable objects include, for the public benefit, the preservation, protection, operation and management of inland waterways for navigation and conservation, protection and improvement of the natural environment and landscape of inland waterways. East Yorkshire Solar Project ("the Project") and the River Ouse The proposed route of the cable connection for the Project would have one interface/crossing below the River Ouse. The River Ouse in this location is a tidal commercial waterway used by both large commercial vessels and for leisure purposes. As Navigation Authority, the Trust is responsible for navigational safety of this part of the river. This is a rural stretch of river with a mixture of open fields and mature hedgerows within the managed river floodplain.	The Applicant notes this comment.
RR-036	Detailed Representations The representations made here are without prejudice to any further or amended representations which the Trust may make following a comprehensive review of the Application as part of the examination process. In this letter, the Trust wishes to make representations on the following: • The draft Development Consent Order (DCO) and Protective Provisions for the Trust • The Trust's Third Party Works Code of Practice • Method of horizontal directional drilling and associated surveys, • Discharge of water into, and prevention of siltation etc. of the river • Lighting during construction • Landscape and Visual Impact • Use of the River Ouse for Works Traffic • The Trust's interest in the River Derwent	The Applicant notes this comment.
RR-036	The draft Development Consent Order (DCO) and Protective Provisions for the Trust There are a number of provisions within the draft DCO which could impact the Trust as Navigation Authority for the River Ouse. The draft DCO was not shared with the Trust as part of a pre-application consultation. However, we welcome the inclusion of the protective provisions in the draft DCO which are substantively in the form suggested in the Trust's response to the applicant's pre-application consultation. The Trust believe	The Applicant has been in discussions with CRT regarding a form of protective provisions to address its concerns in its relevant representation. These are now in agreed form and the Applicant has updated the draft DCO **[AS-008]** at Deadline 1 to reflect these amendments. The Applicant provided the CRT with copies of the legislation listed in Schedule 3 of the draft DCO.

RR Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
	that further engagement is required with the applicant to agree the protective provisions. The Trust sent correspondence to the applicant requesting an opportunity to discuss the provisions on 23rd February 2024. We are awaiting a response, and hope to be able to agree provisions with the applicant by the end of the examination. To aid the examination, the Trust have prepared a set of protective provisions which would resolve and satisfy our principal concerns, which can be shared if required. The protective provisions have been adapted from a series of solar projects on the River Trent that have required Horizontal Directional Drilling below the waterway (including the Gate Burton, Cottom Solar and West Burton Solar Projects). The Trust reserves the ability to add to and amend the draft protective provisions as part of the examination process. Schedule 3 Legislation to be Disapplied By way of Article 6 and Schedule 3, the DCO would disapply the following legislation in so far as it relates to the construction, operation, maintenance or decommissioning of the authorised development: (a) East Riding Drainage Act 1798; (b) Seaton Ross Inclosure Act 1811; (c) Keyingham (and others) Drainage [Yorkshire] Act 1845; (d) York and North Midland Railway (East Riding Branches) [No.1] Act 1846; (e) Wapentake of Ouse and Derwent Drainage Act 1854; (f) Ouse (Lower) Improvement Act 1884; (g) Aire and Calder Navigation Act 1914; (h) Aire and Calder Navigation Act 1924; (i) Boothferry Bridge Act 1925; (j) Yorkshire Water Authority (Alteration of Boundaries of the Lower Ouse Internal Drainage District) Order 1989; (k) The Selby Area Internal Drainage District Order 2017. The Trust does not have sight of all of these pieces of legislation. The disapplication of any of these pieces of legislation could have the potential to impact the Trust's ability to manage the Navigation for the safe passage of vessels. We request that the applicant should communicate with the Trust over the content of the above legislation, so that we can assess if there would be any impact for our operations. Schedule 14, Part 4 Draft Protective Provisions Paragraphs 28, 39 and 41 are incomplete, and the applicant's notes on the draft document suggest that they intend to discuss these parts of the Provisions with the Trust. The Trust has sent correspondence on 23rd February 2024 to highlight our willingness to enter discussions.	The Applicant agreed to the amendment proposed by the CRT to Article 6(g) of the draft DCO and this will be incorporated in the draft DCO submitted at examination Deadline 1. The wording of the amended Article 6(g) will now be: "*the legislation listed in Schedule 3 (legislation to be disapplied) in so far as the provisions still in force are incompatible with the powers contained within this Order and do not impact on the operation or maintenance of the River Ouse as a navigable river.*"
RR-036	The Trust's Third Party Works Code of Practice As with other nationally significant infrastructure projects (NSIPs) that include works that interact with the Trust's network, any parts of the Project with the potential to affect the River Ouse should be carried out in accordance with the Canal & River Trust Third Party Works Code of Practice (CoP). Protective provisions within the DCOs for these NSIPs have included an express obligation obliging the applicant to have regard to the CoP in the detailed survey, design, construction and approval of the relevant works. We welcome that the protective provisions within the applicant's draft DCO do contain wording to this effect. The Trust's CoP is designed to safeguard all users of the navigation and to deal with the nuances of developing adjacent to a commercial waterway with an ever changing tidal riverbed. The extent of potential impacts from development adjacent to, or under, navigational waters could reach far beyond the crossing point proposed. Ensuring that development is appropriately located and controlled on land adjacent to the Trust's network is crucial to limit the potential for risk to users of the river and the associated economic, environmental and social	The Applicant notes this comment.

RR Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
	consequences. Through the CoP, developers engage with the Trust's engineers who are specialists in navigational safety, and the protection and safeguarding of the riverbed. It is essential that the proposals incorporate appropriate measures to protect the users of the river before, during and after construction for all temporary and permanent works affecting the waterway, including surveying and sampling within the waterway. Engaging with the Trust's engineers ensures the appropriate measures are taken.	
RR-036	Horizontal Directional Drilling In terms of Work number 3, relating to the cable crossing of the River Ouse. Para 2.5.4 of the Planning Statement confirms that the works will involve cabling being laid underneath the riverbed of the River Ouse using Horizontal Directional Drilling (HDD). The Framework CEMP details that the HDD works would be installed a minimum of 5m beneath the bed in the case of the River Ouse and a 16m buffer between HDD send and receive pits from the landward toe of flood defences beside the river, which would indicate that the pits would be at least 16m from the river banks on either side. We would welcome confirmation that this would be the case. We consider that, subject to the final detail of the Outline CEMP, protective provisions ensuring engagement with the Code of Practice should be incorporated in the DCO to ensure the proposals incorporate appropriate measures to protect navigational safety.	The protective provisions agreed between the Applicant and the Canal and River Trust includes an express obligation obliging the Applicant to have regard to the Code of Practice in the detailed survey, design, construction and approval of the relevant works. Mitigation measures for trenchless crossings of watercourses stated within the Framework CEMP **[APP-238]** are secured by a requirement in Schedule 2 of the Draft DCO **[AS-008].**
RR-036	Discharge of Water into, and the prevention of siltation etc. of the river Unmanaged discharge of water into the Ouse could result in a local impact on siltation, increase the risk of bank collapse or, in the event of a large discharge of water being sought, could impact the safe navigation of passing vessels. We consider that the proposed power in the draft DCO for the undertaker to discharge water should, in respect of the River Ouse, be subject to the Trust's consent.	The agreed form of protective provisions between the Applicant and the CRT ensures this protection, and has been incorporated in the draft DCO **[AS-008]** submitted at examination Deadline 1.
RR-036	Noise and Vibration The submitted Framework Construction Environmental Management Plan does discuss wider impacts from noise and vibration from construction works. However, the document does not refer to navigational safety with regards to noise or vibration during the proposed directional drilling. These matters should be considered as noise could affect navigational safety and the riverbank and bed may be adversely affected by vibration causing silt mobilization. We therefore request that these matters should be assessed, and that the Framework CEMP is amended to account for this risk as applicable.	As set out in the Framework CEMP **[APP-238]** (which will inform a detailed CEMP to be approved post consent prior to construction and is secured by a requirement in Schedule 2 to the draft DCO **[AS-008]**) HDD works would be undertaken a minimum of 5m beneath the bed of the River Ouse and there will be a 16m buffer between HDD send and receive pits from the landward toe of flood defences. The Framework CEMP **[APP-238]** also sets out that the Applicant commits to no works being undertaken within at least 30 m of the River Ouse. This means that HDD pits would be at least 30m from the riverbanks on either side. In addition, the form of protective provisions agreed between the Applicant and the CRT includes an express obligation obliging the Applicant to have regard to the CRT's Code of Practice in the detailed survey, design, construction and approval of the relevant works. The Applicant will amend the Framework CEMP and Outline Design Principles Document so that the depth of HDD is measured with reference to the surveyed depth of the river bed, i.e. *a minimum of 5m below the lowest surveyed point of the River Ouse riverbed.* The amended documents have been submitted at examination Deadline 1. We understand the agreement of the protective provisions has resolved the CRT's concerns. This is reflected in the signed SoCG submitted at Deadline 1.

RR Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
RR-036	Lighting During Construction 2.6.1 of the Framework CEMP indicates that focused task specific lighting will be provided in areas requiring night time working, with HDD locations highlighted as likely requiring this. Paragraph 2.6.4 details measures to help reduce the impact of light spillage. Temporary lighting has the potential to dazzle passing boaters, and could impact the ecology of the river corridor. We therefore consider it necessary for details of the proposed lighting specification to be provided for works close to the River Ouse. We request that the Framework CEMP should be amended to specifically address impacts of light spillage on passing navigational craft. The Trust would wish to review and provide comment on an amended document prior to the determination of the examination.	The Applicant has discussed these concerns with the CRT and explained that lighting associated with HDD would not be directed towards the river at any time. The CRT concluded that under para 5(4)(b) of the protective provisions in the amended draft DCO **[AS-008]** to be submitted at examination Deadline 1**,** the CRT's engineer can specify 'such other requirements as may be reasonably necessary to prevent detriment', so they can deal with any issues arising from lighting of the HDD at the point they are approving plans of the detailed designs. Therefore, it was agreed that no additional wording was required to be added to the Framework CEMP **[APP-238]** or protective provisions.
RR-036	Use of the River Ouse for Works Traffic The River Ouse is a commercial waterway, which has the potential to be used for the transportation of freight. Chapter 13 (Transport and Access) from the submitted Environment Statement does not discuss the potential for use of the river to transport construction materials to site. Opportunities may exist for the carriage of construction materials to the site via waterborne craft, which could help reduce the need for carriage by road. This would notably be the case for the transport of equipment or HDD activities alongside the River Ouse. This could help to reduce road miles and help improve the sustainability of the proposal, and to help mitigate the impacts of goods transport to and from site in line with the principles of section 5.13 of EN-1. and section 2 of the National Planning Policy Framework. The potential use of the river for such use is not discussed in the submitted documents. We consider that options for alternative non-road based construction transport to and from the site, including use of the river, should be considered alongside the main application, to explore whether this option is feasible (even if just to discount this option). We would be happy to provide further advice upon this.	The usage of nearby ports (such as Goole) to transfer materials required for the Scheme was considered by the Applicant at an early stage of the Scheme development. However, the likely origin of the majority of materials would not make usage of these port locations feasible logistically. As set out in paragraph 6.12.19 of the Planning Statement **[APP-233],** the River Ouse is not considered feasible to transport equipment and materials via waterborne transport for the Scheme. In addition, it should be stated that a full and detailed assessment of potential traffic and transport impacts at sensitive receptors on the road network has been undertaken within Chapter 13: Transport and Access, ES Volume 1 **[APP-065]**. The conclusions (reference to Section 13.7) indicated that significant adverse effects would only be expected in one location (B1228 between B1230 and Brind Lane junctions) and not related to freight movements. No significant adverse effects would be expected at any other locations. Any impacts (including at the B1228 between B1230 and Brind Lane junctions) would be temporary and would be managed through the embedded mitigation measures. The Framework CTMP **[APP-113]** has been developed to consider measures seeking to minimise the impacts and disturbance caused by construction traffic on the local road network. Appendix A of the Planning Statement **[APP-233]** and Appendix A: National Policy Statements for Energy (designated January 2024) Accordance Tables submitted at Deadline 1 consider compliance with the Scheme against relevant NPS policies.
RR-036	The Trust's interest in the River Derwent The applicant's Book of Reference has named the Trust as having an interest in the River Derwent in respect of maintenance (Plot 18/09). We wish to confirm that the Trust has no responsibilities as Navigation Authority (or landowner) for the River Derwent in this location. As a result, the applicant may wish to amend the Book of Reference to avoid any future potential confusion. The above comments are given without prejudice to other matters or comments that may be raised by the Trust at a later stage of the examination process.	The Applicant notes this comment and will update the Book of Reference **[AS-012]** to remove the CRT as having an interest in the River Derwent in respect of maintenance (Plot 18/09). This update to the Book of Reference has been submitted at examination Deadline 1.

North Yorkshire Fire & Rescue

Table 2-9. Applicant's Responses to Relevant Representations – North Yorkshire Fire & Rescue Service

RR Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
RR-283	Grid Scale Battery Energy Storage System guidance issued by the National Fire Chiefs Council should be applied to the design of the project	There will be no battery energy storage system as part of the Scheme. For this reason, Grid Scale Battery Energy Storage System guidance issued by the National Fire Chiefs Council is not applicable to the Scheme.

Ouse and Humber Drainage Board

Table 2-10. Applicant's Responses to Relevant Representations – Ouse and Humber Drainage Board

RR Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
RR-288	I am registering on behalf of Ouse and Humber Drainage Board, an Internal Drainage Board whose district includes the development area. The Land Drainage Act 1991 and local Land Drainage Byelaws apply, which may affect the proposals.	The Applicant notes this comment.

Forestry Commission

Table 2-11. Applicant's Responses to Relevant Representations – Forestry Commission

RR Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
RR-118	Thank you for engaging with the Forestry Commission on this proposal. As the Governments forestry experts, we endeavour to provide as much relevant information to enable the project to reduce any impact on irreplaceable habitat such as Ancient\semi natural Woodland as well as other woodland. Comments below are in line with NPS for Energy (EN1) 5.11.27. There is no ancient woodland within the site boundary. However, there are numerous small woodlands, including lowland mixed deciduous woodlands. Lowland mixed deciduous woodland is on the Priority Habitat Inventory (England). Some of the woodlands within the proposal footprint remain under Obligation of Farm Woodland Premium Scheme grant support, other woodlands have woodland management plans with approved Felling Licences, (Felling Licences may be conditional on restocking and maintaining replanted trees for 10 years). Measures should be taken to ensure project design and management should not prevent the future access to and management of woodlands. Woodlands habitat value generally increases as a result of sustainable woodland management. Farm woodland management can be reliant on (seasonal) access from adjacent farm land, proposals should ensure woodland management access is maintained or enhanced to allow delivery of management objectives, which may include biodiversity value and ecosystem services. It's good to see proposals seek to retain existing woodland, noting the exception of an area of short rotation energy crop plantation. Opportunities should be taken where possible to link and buffer existing woodlands, trees and hedges, which normally increases their ecological value. While not specific to this proposal, the cumulative impact of multiple extensive developments on availability of land for other uses, including woodland creation or farming should be considered. Proposals include creation of 8.1ha native new woodland these should be designed and managed in order to mitigate potential negative impacts of development, and designed to facilitate future sustainable management. When proposing significant planting schemes, there are a number of issues that need to be considered: • Consideration of ecological and cultural (historic environment) features that may be affected by woodland creation • Biosecurity of all planting stock needs to be considered to avoid the introduction of pests and diseases • Woodlands should be designed to be climate and pest and disease resilient.? • Maximise the ecosystem services benefits of all new woodland wherever possible e.g. for flood reduction and also to ensure the planting contributes to a resilient treescape by maximising connectivity across the landscape. • Plans are in place to ensure long term management and maintenance of woodland. The inclusion of the minimum buffer distance of 15m from existing woodland is welcomed as a minimum, however it should be noted that while a 15m buffer limits the impact of the development proposals on existing woodland, once implemented this buffer distance may not adequately mitigate the ongoing shading impact of woodland / trees on solar panels, thereby creating potential conflict between the interests of solar farm management and the retained woodland and trees. A 15m buffer from the stems of adjacent woodland is effectively reduced by the overhang of branches (which can often be 5-10m overhang). Increasing buffer width particularly on north, east and west side of woodlands would reduce shading on the development and help mitigate potential	The Applicant notes the Forestry Commission's comments with regard to the existing small areas of woodland, including Priority woodland which are present within and adjacent to the Solar PV Site. The Applicant commits to enabling access to existing woodland within or abutting the Order limits where relevant during construction, operation and decommissioning. Sections 5 and 6 of the Framework LEMP **[APP-246]** explain the management of existing vegetation and proposed planting as part of the Scheme, including long term management. The Framework LEMP has been updated to include a specific commitment to enabling access to existing adjacent woodland. The updated Framework LEMP is submitted at Deadline 1 of the Examination. The detailed LEMP, which will need to be approved post consent prior to construction by East Riding of Yorkshire Council and North Yorkshire Council (the relevant local authorities) and must be in accordance with Framework LEMP **[APP-246],** will secure the management measures for existing woodland and access to adjacent existing woodland. The detailed LEMP is secured by requirement 6 in Schedule 2 to the Draft Development Consent Order **[AS-008].** Paragraph 4.1.18 of the Framework LEMP **[APP-246]** explains that the Scheme will increase the overall woodland cover across the Solar PV Site and connectivity of woodland habitats by linking existing areas of woodland with new areas of planting. The Scheme design will increase the overall woodland cover with 8.1 ha of native woodland planting and shrub planting with trees and woodland edge planting, and further 1.95 ha of native traditional orchard Furthermore, the proposed planting will improve connectivity of woodland habitats by linking existing areas with woodland with new areas of planting. This is illustrated on the Framework Landscape Masterplan at Appendix A of the Framework LEMP **[APP-246]**. As set out in Section 5 of the Framework LEMP **[APP-246]** new woodland and shelter belts are proposed and in some cases are provided as mitigation to help screen sensitive receptors and soften views, but also to provide increased structure, ecological connectivity, and interest within the landscape. Specific management measures for new woodland are explained in sections 5 and 6 of the Framework LEMP **[APP-246]** and demonstrate that the Scheme will facilitate future sustainable management of proposed woodland. An update has been made to the Framework LEMP to ensure that the Scheme commits to adhering to the principles of the UK Forestry Standard for any new woodland planting and management. The updated Framework LEMP is submitted at Deadline 1 of the Examination.

RR Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
	future management conflict, and maintain or enhances ecological value of trees and woodlands. For the purposes of a 50 year project I would encourage decisions to reflect the maximum tree size within the project lifespan. The proposals indicate the proposed (15m) buffer from woodlands does not inhibit placement of cables within this woodland buffer zone. Inclusion of cables within this zone has potential to undermine the purpose and integrity of such buffers. This is particularly important if cabling is to be installed below ground, or is on the ground and allowed to become incorporated in vegetation over time. The woodland/ tree buffer should seek to secure protection of the adjacent habitat, through exclusion of development activity including within the critical root protection zone of woodlands and trees. I would therefore encourage further consideration of the activity undertaken within tree and woodland protection buffers. The Forestry Commission would be able to provide further advice in respect of the above comments.	The Applicant has considered ecological and cultural (historic environment) features that may be affected by woodland creation and sets out an assessment of how the Scheme interacts with these features within Chapter 8: Ecology, ES Volume 1 **[APP-060]** and Chapter 7: Cultural Heritage, ES Volume 1 **[APP-059].** The Applicant is committed to preparing a Biosecurity Management Plan which will set out procedures to ensure any imported building/landscaping materials are free from invasive non-native species and diseases (see Table 3 and Table 15 of the Framework CEMP **[APP-246]**). Table 6 Arboriculture of the Framework CEMP specifically commits to biosecurity measures in accordance with the Arboricultural Association Guidance Note 2 (which relates to pruning/felling/access rather than planting). Proposed woodland planting will be species which will be appropriate to the particular requirements of the geographical area, but also take account of climate change and potential pest and pathogen threats, as set out in section 5 of the Framework LEMP **[APP-246]**. The Applicant commits to maximising the ecosystem benefits of all new woodland within the Framework LEMP **[APP-246]** by managing them to facilitate longevity, increased species diversity, enhanced habitat value and connectivity and greater resilience to climate change. The Framework LEMP **[APP-246]** sets out the plans in place to ensure long term management and maintenance of woodland. An update has been made to the Framework LEMP to ensure that the Scheme commits to adhering to the principles of the UK Forestry Standard for any new woodland planting and management. The updated Framework LEMP is submitted at Deadline 1 of the Examination. A detailed LEMP and a detailed CEMP, which will need to be approved post consent prior to construction by East Riding of Yorkshire Council and North Yorkshire Council (the relevant local authorities) and must be in accordance with the Framework LEMP and Framework CEMP, will secure the above-mentioned measures. The detailed LEMP is secured by requirement 6 and detailed CEMP is secured by requirement 11 in Schedule 2 to the Draft Development Consent Order **[AS-008].** The Scheme has been designed with impact avoidance measures, including buffers to existing woodlands, trees and hedges. These include minimum buffers of: • 15 m from woodlands, individual trees and hedgerows with trees (with few exceptions for some cabling); and • 10 m from hedgerows without trees. The minimum buffers proposed as part of the Scheme design are detailed in Table 3 of the Framework CEMP **[APP-238]** and the Framework LEMP **[APP-246]**. This will secure the working space for works close to woodlands. Table 6 also includes other arboricultural mitigation measures to avoid and minimise impacts on trees and their root protection areas. Paragraph 4.1.18 of the Framework LEMP **[APP-246]** explains that the Scheme will increase the connectivity of woodland habitats by linking existing areas of woodland with new areas of planting. This is illustrated on the Framework Landscape Masterplan at Appendix A of the Framework LEMP **[APP-246]**.

RR Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
		The Applicant has considered shading as part of the design process. This is explained in section 4.6 of the AIA **[APP-102]**. Trees groups and woodlands have been assigned specific buffers based on their actual RPAs in accordance with British Standard 5837:2012. The AIA states that the Tree Constraints Plan **[APP-103]** and the Tree Protection Plan **[APP-104]** illustrate that no solar PV panels will be subject to significant shading at the time of construction. The AIA **[APP-102]** states shading impacts are '*typically slight and are generally associated with mature trees which will not increase significantly in size'*. It is generally the height of trees rather than the extent of overhanging branches that results in the greatest volume of shading and this is reflected in the guidance in British Standard 5837: 2012 section 5.2 Note 1. The Applicant therefore considers the buffer distances from trees and woodland to be appropriate with regard to shading. For clarification, the design life of the Scheme is 40 years. Requirement 18 in Schedule 2 of the Draft Development Consent Order **[AS-008]** sets out that the final date of decommissioning of the Scheme must commence no later than 40 years after the final commissioning. Regarding cabling, the Applicant provides an explanation, at Section 4.5 of the AIA report **[APP-102],** of how the design for the Scheme will avoid, where practicable, cable routes or access routes incurring within the RPA of retained tree features (including woodlands), and where avoidance is not practicable – how it will be managed in principle. The final extent of incursions and the methodology for any such work will be detailed as part of an Arboricultural Method Statement secured as part of the detailed CEMP as per Table 6 of the Framework CEMP **[APP-238].** Retained trees will be periodically inspected by an arboriculturist during construction as set out in the Framework LEMP **[APP-246].** Where excavation works are within the RPA of retained trees, works will be undertaken under a watching brief by an arboriculturist to ensure agreed methodologies are fully implemented, to record any root pruning and to recommend further arboricultural remedial works where required. The Applicant considers that with the measures described above and secured through the detailed LEMP, and the limited activity within the buffers proposed, this will, where possible, avoid impact on existing tree and woodland RPAs. The Government has identified through its energy policy, most recently in the Overarching National Policy Statement for Energy EN-1 and National Policy Statement for Renewable Energy EN-3, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's Statement of Need **[APP-232]**, this includes low carbon energy generation using solar technology. Developing the Scheme at its proposed size will therefore be an important contribution to meeting this need. In accordance with NPS EN-1 paragraph 5.11.3 and NPS EN-3 paragraph 2.10.29 the Applicant considered the use of previously developed land and did not identify any available land within its area of search of an appropriate size to locate the Scheme.

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		The Scheme is located mostly on lower quality agricultural land, with the majority of the Scheme being on land not classed as Best and Most Versatile (BMV). For the Solar PV Site, 92.8% of the land used is non BMV land. The Applicant's discussions with farmers who farm areas of the Solar PV Site have also identified that this land is difficult to farm. The vast majority of agricultural land within the Order limits would also be available for return to its existing agricultural use following decommissioning of the Scheme. The conversion of arable land to grassland during the 40 year operational period has the potential to accrue improvement to soil function over a large area. The Applicant has assessed the cumulative effects of the Scheme. The assessment of cumulative effects of the Scheme with other existing and proposed energy developments as well as other developments in the locality is set out in chapters 6–16 of the ES **[APP-058** to **APP-061, AS-014, APP-064** to **APP-067,** and **AS-016]** and is summarised in Chapter 17: Cumulative Effects and Interactions, ES Volume 1 **[APP-069].** No new likely significant adverse effects are anticipated to arise from the Scheme when considered alongside those effects generated by nearby developments. The Scheme is anticipated to have a significant beneficial effect upon the functional improvement of soil resources that would follow with the conversion of arable land to grassland when considered with the other solar farm proposals in the area. Mitigation measures to minimise adverse effects on soil resources are set out in the Framework Soil Management Plan **[APP-241]** which is secured by a requirement in Schedule 2 of the draft DCO **[AS-008]**.

Ouse & Derwent Internal Drainage Board

Table 2-12. Applicant's Responses to Relevant Representations – Ouse & Derwent Internal Drainage Board

RR Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
RR-287	Part of the Grid Connection Corridor is within the district for Ouse & Derwent Internal Drainage Board. Our district sits between the River Derwent and the River Ouse around Babthorpe and Hemingbrough. Our comments therefore relate solely to the Grid Connection Corridor within that area. Under the Land Drainage Act 1991 and the Boards' byelaws, the Board's prior written consent (outside of the planning process) is needed for:- a. any connection into a Board maintained watercourse, or any ordinary watercourse in the Board's district. b. any discharge, or change in the rate of discharge, into a Board maintained watercourse, or any ordinary watercourse in the Board's district. This applies whether the discharge enters the watercourse either directly or indirectly (i.e. via a third party asset such as a mains sewer). c. works within or over a Board maintained watercourse, or any ordinary watercourse in the Board's district – for example, land drainage, an outfall structure, bridges, culverting etc. d. any proposed works or structures in, under, over or within 9 metres of the top of the bank of any "Board maintained watercourse". Please note that the Board does not, generally, own any watercourses and the requirement to obtain the Board's consent is in addition to obtaining consent from any land owner or other authority to carry out the relevant works. Using the "Environmental Statement – Figure 9-2 – Drain Names – Sheet 3 of 3", the Board will be looking at the below watercourses which may/will be effected: 1. Drain DE21 – this is the Board maintained watercourse known as Loftsome Bridge Drain. 2. Drain DE53 - this is the Board maintained watercourse known as Bishops Clough Drain. The Board's pumping station is downstream, prior to the outfall into the River Derwent. 3. Drain DE52 – this is an ordinary watercourse not maintained by the Board but by the riparian owner. 4. Drain DE03 – this is an ordinary watercourse not maintained by the Board but by the riparian owner. The Board's understanding is that there are no drainage requirements along the Grid Connection Corridor. The Board will therefore be looking at: 1. cables crossing any watercourses within our district; and 2. access road crossings over watercourses within our district.	The Applicant notes that the Ouse and Derwent IDB accept that the element of the Scheme that is within the district for the IDB is within the Grid Connection Corridor only. The Applicant is seeking to disapply the need for consent under s.23 of the Land Drainage Act 1991, alongside any byelaws made under the s.66 of the same Act. This is standard procedure, following DCOs recently made of a similar nature. The Applicant notes the recent guidance "Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects" which confirms *"The presumption should be therefore that where an applicant proposes a provision within their DCO to remove a requirement for a prescribed non-planning consent to be granted by the relevant body, the body that would normally be responsible for granting this consent is expected to make every effort to agree to the proposal. Such a body should only object to the inclusion of such provision with good reason, and after careful consideration of reasonable alternatives."* The Applicant understands that the Ouse and Derwent IDB is now satisfied on this point. The Applicant accepts that the Ouse and Derwent IDB will be looking at the watercourses identified in their relevant representation. The Applicant notes that the Ouse and Derwent IDB accept that there are no drainage requirements along the Grid Connection Corridor in relation to the Scheme, and they will therefore be looking at cable crossing and access road crossings over any watercourses within the district.
RR-287	CABLE CROSSINGS The Environmental Statement, Chapter 9, states: "9.4.4 All cables will be installed a minimum of 1.5 m below the bed of watercourses (excluding the River Ouse and River Derwent). … The minimum installation depth of 1.5 m for Featherbed Drain, DE53 and Loftsome Bridge Drain will ensure that the channel is not disturbed or risk being exposed by future bed scour." With regards to the proposed Horizontal Directional Drilling, the Environmental Statement, Chapter 9, states: "9.6.23 The sections of the cables that will be installed via trenchless approaches will require send and receive pits to be installed at each crossing point. … The send and receive pit excavations for drilling/boring will be located at least 10 m from the watercourse edge, as measured from the top of bank (or 16 m from the landward toe of flood defences). This may require survey work (prior to construction) in some locations to adequately define and agree the top of bank position." The Board notes that the applicant is proposing Horizontal Directional Drilling for both DE21 and DE53. The principle of this is agreed. The Environmental Statement, Chapter 9, states: "9.4.5 As a worst case for the assessment, it is assumed that all other watercourses crossings required for cables would be installed using an open cut technique. This is considered	The Applicant notes that the all cables will be installed a minimum of 1.5 m below the bed of watercourses (excluding the River Ouse and River Derwent), and that the minimum installation depth of 1.5 m for Featherbed Drain, DE53 and Loftsome Bridge Drain will ensure that the channel is not disturbed or risk being exposed by future bed scour, as set out in the Framework CEMP **[APP-238],** which will inform a detailed CEMP secured by a requirement in the draft DCO **[AS-008].** Further detail is set out in Chapter 9: Flood Risk, Drainage and Water Environment, ES Volume 1 **[APP-061]**. The Ouse and Derwent IDB have not raised any objections to this. The Applicant notes that the River Ouse and Derwent IDB agree with the principles of HDD for both DE21 and DE53, which is set out in Chapter 9: Flood Risk, Drainage and Water Environment, ES Volume 1 **[APP-061]** and the Framework **CEMP [APP-238],** which will inform a detailed CEMP secured by a requirement in the updated draft DCO which will be submitted at Deadline 1 of the Examination**.** As set out in paragraph 9.4.5 of Chapter 9: Flood Risk, Drainage and Water Environment, ES Volume 1 **[APP-061]**, the assumption that open cut crossings may be used for Drain DE52 and

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	a reasonable worst-case assumption and follows a precautionary approach. 9.4.6 Where intrusive crossings of small watercourses are required, it is assumed that water flow would be maintained by temporarily damming the watercourse and either over pumping or fluming the flow through the works. The final crossing proposals for watercourses cable installation will be determined at the detailed design stage post-consent…" Open cut crossings are potentially proposed for Drain DE52 and Drain DE03. The Board would prefer the use of Horizontal Directional Drilling for these watercourses but if this is not possible, we shall await specific details in due course.	Drain DE03 is a reasonable worst-case assumption following a precautionary approach. The Applicant will continue to liaise with the Ouse and Derwent IDB during the detailed design of the Scheme, to agree an approach. Further details of the crossing designs are not yet available but would be presented to the Ouse & Derwent IDB as part of the plans of specified work to be submitted to the IDB for approval in accordance with paragraph 20(2) of Part 3 of Schedule 14 of the updated draft DCO which will be submitted at Deadline 1 of the Examination.
RR-287	ACCESS ROAD CROSSINGS The Environmental Statement, Chapter 9, states: "9.6.34 … a temporary open span bridge is to be installed to facilitate the construction of the Grid Connection Corridor on Drain DE53 at NGR SE 69239 29218. Bridge foundations would again be set back from the edge of the channel to ensure continuity of riparian habitat." There only appears to be one potential access road crossing within the Board's district. This is a new open span bridge on Drain DE53. The Board has no objection to the principle of this new bridge. Our initial comments would be: 1. There must be sufficient distance between the proposed bridge and our pumping station downstream. 2. Given that this is a temporary crossing, then provided the landowner is happy with the bridge foundations being set more landward (rather than on the bank top), the Board are satisfied in this regard also.	The Applicant notes that the Ouse and Derwent IDB have no objection to the principle of the new open span bridge on Drain DE53. The Applicant notes that the Ouse and Derwent IDB seek to ensure that there is sufficient distance between the proposed bridge and their pumping station downstream, and that the proposed bridge foundations are to be set more landward, rather than on the bank top, provided the landowner is satisfied with this approach. This can be confirmed to the Ouse and Derwent IDB as part of the plans of specified work to be submitted to the Ouse and Derwent IDB for approval in accordance with paragraph 20(2) of Part 3 of Schedule 14 of the draft DCO **[AS-008].**
RR-287	DRAFT DEVELOPMENT CONSENT ORDER The Board notes that Article 6 of the draft Development Consent Order is disapplying sections 23 and 32 of the Land Drainage Act 1991, together with any Byelaws that the Board has made under Section 66 of the Land Drainage Act 1991. Instead, Article 43 states that Schedule 14 (the Protective Provisions) have effect. Part 3 of Schedule 14 is relevant to the Board. Article 16 relates to the discharge of surface water. Article 16(5) states that the protection provisions apply where the drain "belongs or under the control of a drainage authority". The Board does not "own" any watercourses and we do not maintain all watercourses in our district. Under our Byelaws, the Board's prior written consent is however needed for any discharge of water into any watercourse within our district (whether it is Board maintained or not). We would therefore ask that it is made clear that Article 16(5) includes any watercourse within the district of a drainage authority. With regards to Part 3 of Schedule 14 of the draft Development Consent Order, the Board are in agreement with these provisions other than: a) ""specified work" means so much of the authorised development as is in, on, under, over or within 8 metres of a drainage work or is otherwise likely to affect the flow of water in any watercourse." The Board would ask that this is amended to 9 metres and would like to specifically note that if it is a watercourse, for example, we would be looking at 9 metres from the bank top and would not measure from the water's edge or centre of the watercourse. b) Please can we have a similar provision to that provided to the Environment Agency at paragraph 51 of Schedule 14. The Board would request: "If by reason of construction of the specified work the drainage authority's access to an ordinary watercourse is materially obstructed, the undertaker must provide an alternative means of access as soon as reasonably practicable to allow the drainage authority to maintain the ordinary watercourse."	The Applicant has engaged with the IDB to seek to resolve its concerns with the DCO drafting. With regards Article 16(5), if the byelaws require IDB consent for any discharge into a watercourse then that is a watercourse "under the control" of the IDB and so captured by the provision. If the watercourse is not under the control of the IDB then the owner of the drain must consent in accordance with Article 16(3) and (4). Therefore, either the drain is not controlled by the IDB and owner permission must be sought or it is controlled by the IDB and the protective provisions apply. This is reasonable and is well precedented. The Applicant understands that the IDB is now satisfied on this point. With regards the definition of "specified work" and the extension of 8m to 9m, the Applicant has agreed to extend the distance in the definition of "specified works" in the protective provisions in Part 3 of Schedule 14 to the DCO to 9m for land under the control of the Ouse and Derwent Internal Drainage Board. This is reflected in the updated draft DCO submitted at Deadline 1. With regards to the provision relating to access, the Applicant considers this is impractical given a crossing of the watercourse will take place. The provision for the benefit of the Environment Agency is limited to flood defences, which of a significantly higher risk than ordinary watercourses and drainage works. Given the Ouse and Derwent IDB must approve the plan of specified works in advance of them being carried out, provision for continued access can be ensured through that approvals process, where necessary and appropriate. The Applicant has updated the Protective Provisions at Part 2 of Schedule 14 of the draft DCO at Deadline 1 to provide the following: 20.-(1) Before commencing construction of a specified work, the undertaker must submit to the drainage authority plans of the specified work (such plans to include any proposals for access for

RR Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
		maintenance to the drainage work) and such further particulars available to it as the drainage authority may reasonably require within 14 days of the submission of the plans.

Northern Powergrid (Yorkshire) Plc

Table 2-13. Applicant's Responses to Relevant Representations – Northern Powergrid (Yorkshire) Plc

RR Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
RR-284	The following representations are submitted on behalf of Northern Powergrid (Yorkshire) Plc ('Northern Powergrid') as an electricity undertaker for the area within which the East Yorkshire Solar DCO Project is located: Northern Powergrid is in principle supportive of the East Yorkshire Solar DCO project but has concerns relating to the impacts which the proposed scheme will have on Northern Powergrid's existing assets and their pending improvement works. There is a significant amount of Northern Powergrid infrastructure within the red line boundary area of the Order 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. Northern Powergrid's rights for these assets are essential in maintaining an uninterrupted power supply to the customers they serve. The proposed development seeks to interfere with Northern Powergrid's existing apparatus; there are many points at which the East Yorkshire Solar Farm DCO crosses Northern Powergrid's overhead lines and underground cables which are vital to Northern Powergrid's 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 required infrastructure including the depth, diameter and respective easement strips are unknown. The accompanying Compulsory Purchase Order for the development seeks 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. In addition to the technical impacts of the proposed development, Northern Powergrid has concerns over the 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. Northern Powergrid has discussed its concerns with East Yorkshire Solar Farm Limited ('the Applicant') and the parties are working closely to reduce the project's impacts on Northern Powergrid's apparatus and agree bespoke protective provisions within the draft Order. Northern Powergrid is keen to keep an open dialogue with the Applicant and to engage with the applicant's legal representative to agree appropriate amendments to the protective provisions.	The Applicant is in discussions with Northern Powergrid (Yorkshire) Plc regarding a bespoke form of protective provisions, noting that the assets are currently protected under Part 1 of Schedule 14 of the draft DCO **[AS-008]**. The Applicant understands that these protective provisions, when agreed and completed, will allow Northern Powergrid (Yorkshire) Plc to withdraw its representation. The Applicant is confident that agreement will be reached with Northern Powergrid (Yorkshire) Plc at an early stage of the Examination.

National Highways

Table 2-14. Applicant's Responses to Relevant Representations – National Highways

RR Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
RR-265	National Highways requests to be an Interested Party on this application. This is because there is potential for the proposals to impact upon the safe and efficient operation of the Strategic Road Network. We have reviewed the Scoping documents and would recommend that.	Whilst it is accepted that some use of the strategic road network will be required by vehicles during the construction period, information provided within Table 24 of the Transport Assessment **[APP-112]** demonstrates that across the day, a low volume of traffic is anticipated to use M62 Junctions 36 and 37 (which forms part of the SRN managed by National Highways) and therefore the Scheme is not anticipated to impact upon the safe and efficient operation of the SRN. The maximum number of vehicles would use Junction 37, during the hours of 06:00–07:00 and 19:00–20:00, when 95 two-way construction worker vehicle movements are predicted to move through the junction. As the volume of traffic expected during the network peak hours (e.g. 08:00–09:00 and 17:00–18:00) are zero the Applicant has not undertaken any junction assessments at these locations.
	1) The production of a detailed CTMP is conditioned and agree with National Highways on any permission granted for the proposed development. The detailed CTMP would specifically need to contain a commitment to ensure that the arrival and departure of construction staff shift times / construction deliveries are secured outside of the AM / PM network peak hours as is currently proposed. a. The CTMP would also need to contain a detailed construction staff trip monitoring methodology which will provide detail on how the adherence to staff shift periods / movements will be monitored, in addition to detail as to what adjustive / remedial measures will be implemented should construction movements be considered to materially breach any imposed condition	A Framework CTMP **[APP-113]** has been developed to set out measures to minimise the impacts and disturbance caused by construction traffic on the local road network. The Framework CTMP **[APP-113]** will be developed further by the appointed contractor who will liaise, as necessary, with the Local Highway Authorities, National Highways, North Yorkshire and Humberside Police and other stakeholders to prepare a detailed CTMP. The Applicant has prepared a Framework CTMP **[APP-113]** that will inform a detailed CTMP. This sets out at Table 2 that there will be no generated trips travelling across the road network during network AM and PM peak hours of 08:00–09:00 and 17:00–18:00 respectively, therefore construction traffic is secured outside these hours. The Framework CTMP **[APP-113]** which the detailed CTMP will need to substantially accord with, explains that a Traffic Management and Monitoring System (TMMS) will be developed to provide details of the technologies and other means employed to monitor HGVs to/from the Construction Compounds (e.g., Global Positioning System (GPS) and Automatic Number Plate Recognition (ANPR)). This will enable the Applicant to monitor the following: • Compliance with the Heavy Goods Vehicles (HGV) routes; • Compliance with the limits on the number of HGVs in terms of number of deliveries arriving and departing at any one time and over the course of the day; and • Compliance with the timing restrictions throughout the day. In addition, the TMMS will also record all Light Goods Vehicles (LGV) which enter and exit the Site, to allow all vehicles to be monitored. In the instance that a complaint has been made in relation to inappropriate routes being used, then this will be cross-referenced with the TMMS to allow appropriate actions to then be taken. The precise form of TMMS would be determined following the appointment of a contractor and will include a summary of the contractual requirements which those visiting the Site will have to adhere to, along with the measures to be taken for non-compliance.

RR Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
		The detailed CTMP (which must substantially accord with the Framework CTMP) will need to be approved post consent prior to construction by the relevant local authorities and this is secured by requirement 13 in Schedule 2 to the Draft DCO **[AS-008]**. Under requirement 13 approval of the detailed CTMP is to be approved in consultation with National Highways and this is reflected in Schedule 2 of the draft DCO which is being submitted to the examination at Deadline 1.
	2) We would recommend that the production of a Decommissioning Management Plan [DMP] is conditioned on any permission granted for the proposed development. As and when considered necessary, the DMP would need to detail how any highway impact associated with the decommissioning of the development site would be secured and controlled.	The Applicant is required under requirement 18 of the draft DCO **[AS-008]** to produce a detailed Decommissioning Environmental Management Plan (DEMP) which will need to be substantially in accordance with the Framework DEMP **[APP-240]** which was submitted with the Application. The Framework DEMP **[APP-240]** details how highway impacts associated with the decommissioning of the Scheme would be secured and controlled.

National Grid Electricity Transmission Plc

Table 2-15. Applicant's Responses to Relevant Representations – National Grid Electricity Transmission Plc

Examination Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
AS-022	This relevant representation is submitted on behalf of National Grid Electricity Transmission Plc ("NGET") in respect of the Project, and in particular NGET's infrastructure and land which is within or in close proximity to the proposed Order Limits. NGET will require appropriate protection for retained apparatus including compliance with relevant standards for works proposed within close proximity of its apparatus. NGET'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 NGET's interests in land or NGET's apparatus, NGET will require appropriate protection and further discussion is required on the impact to its apparatus and rights.	The Applicant notes this comment.
AS-022	NGET infrastructure within/in close proximity to the proposed Order Limits NGET owns or operates the following infrastructure within or in close proximity to the proposed 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: • 4VC 400kV OHL and associated cable fibre • Drax Substation 400kV/132kV Protection of NGET Assets As a responsible statutory undertaker, NGET'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, 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. As noted, NGET's rights to retain its apparatus in situ and rights of access to inspect, maintain, renew, repair and refurbishment such apparatus located within or in close proximity to the Order Limits should be maintained at all times and access to inspect and maintain such apparatus must not be restricted. NGET 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. NGET is liaising with the Applicant in relation to such protective provisions, along with any supplementary agreements which may be required. NGET 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 NGET assets which will remain in situ, along with facilitating all future access	The Applicant notes this comment. The Applicant has provided protective provisions for the benefit of NGET at Part 7 of Schedule 14 of the draft DCO **[AS-008]**. The Applicant is engaged with NGET regarding the form of protective provisions and is confident that agreement will be reached with NGET at an early stage of the Examination.

Examination Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
	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. Compulsory Acquisition Powers in respect of the Project The Applicant is seeking compulsory powers over plot 22/172 which forms part of NGET's substation at Drax. NGET objects to the compulsory acquisition of its assets, land or rights over its land in the absence of an agreed form of Protective Provisions. It is essential that nothing contained within the Order prevents NGET from continuing to deliver future plans or from accommodating other electricity connection customers. Furthermore, the Applicant is seeking compulsory powers over a number of plots which include NGET overhead line assets and/or interests. As noted, where the Applicant intends to acquire land or rights, or interfere with any of NGET's interests in land, NGET will require further discussion with the Applicant and NGET will require its standard Protective Provisions to be included within the Order NGET 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.	
AS-022	Connections The Applicant's Grid Connection Statement states that NGET has confirmed a spare bay within the existing National Grid Drax Substation. At present NGET is unable to confirm the connection location for the East Yorkshire Solar Farm project until it has undertaken further site reviews.	This comment is noted. The grid connection offer (a Bilateral Embedded Generation Agreement (BEGA)) to the Applicant and Eclipse was originally received on 17 December 2021 and this was accepted by the Applicant and Eclipse on 12 April 2022. The BEGA is for the export of up to 400 MW. Engagement with National Grid Electricity System Operator Limited has continued since 2021 and discussions are ongoing at the time of this submission.
AS-022	NGET New Infrastructure NGET is promoting the Eastern Green Link 2 project (EGL2). EGL2 is a 2GW electricity transmission to connect the transmission systems of Scotland and England. It is a nationally significant project which benefits from consent. There is an urgent need for EGL2 as part of the decarbonisation of the electricity grid and, in particular, in the context of the target of 50GW of offshore wind energy by 2030. NGET was granted planning permission from East Riding of Yorkshire Council (application reference 22/01990/STPLFE) on 3 March 2023 (the ERYC Permission) and was granted planning permission from North Yorkshire Council (with application reference 2022/0711/EIA) on 11 August 2023 (the NYC Permission) for the development of the onshore components for EGL2. These comprise approximately 68km of underground High Voltage Direct Current (HVDC) cables from Fraisthorpe to Drax, a converter station located off New Road at Drax and underground High Voltage Alternating Current (HVAC) cables between the converter station and Drax	The Applicant is engaged in commercial discussions with NGET regarding the coexistence of the Scheme and EGL2. The Applicant is confident that coexistence can be achieved and will provide regular updates to the Examining Authority during Examination.

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400kV Substation as well as associated temporary works to facilitate construction. Subject to planning permission being granted it is expected that construction of the onshore components will be undertaken between 2024 and 2029. NGET is currently seeking voluntary land rights in respect of the EGL2 project and made The National Grid Electricity Transmission plc (Scotland to England Green Link 2) Compulsory Purchase Order 2023 on 5 September 2023 (the CPO).

NGET has engaged with the Applicant at the pre-application stage and has submitted consultation responses to make it clear to the Applicant that the Applicant must have regard to the onshore components of EGL2 in developing its scheme, and that it would need to fully consider EGL2 as part of the cumulative assessment of your Environmental Impact Assessment (EIA) and its outline design principles statement.

In spite of this engagement, the Project still overlaps with the land required for EGL2 in a number of areas. The plans appended to this representation (ref: J002384-24-01, Sheet 1 of 3, Sheet 2 of 3 and Sheet 3 of 3) show the extent of EGL2 (edged red) and the extent of the Project (edged blue). This demonstrates the interaction between the Project and EGL2 and the continued overlap.

NGET will require its ordinary protective provisions to apply in respect of EGL2. In order to avoid serious detriment to NGET and its undertaking, the Applicant must not be granted powers of acquisition in respect of any land required for EGL2.

In order to protect EGL2, the DCO for the Project and the Outline Design Principles Statement
must make it clear that:
• no part of the ground mounted solar photovoltaic generating station or any associated works can be located in an area marked for EGL2; and
• no part of the grid connection for the Project can be located in the area marked for EGL2. This is particularly important given that the Applicant seeks broad powers of compulsory acquisition over an area of land consented for the converter station for EGL2.

Land Position for EGL2
NGET is now the freehold owner of Plot 22/165 as shown on the Applicant's Land Plans. Plot 22/165 is required for the construction of the converter station as part of EGL2, and the associated HVAC cable connection to connect to the Drax substation. The Project's Grid Connection interacts with the location of the EGL2 converter station where is it routed along New Road. NGET has drawn the Applicant's attention to this matter during the pre-application stages of the Project.

The Applicant has not sought to acquire these rights through negotiation with NGET and given the availability of a route for the grid connection in the adjacent street there is no compelling case in the public interest for the acquisition of these rights over NGET's land. Through CPO for EGL2, NGET is also seeking the acquisition of rights over parts of:

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	• Plot 22/151 and Plot 22/167 to deliver the HVAC cable connection required to connect EGL2 to the Drax substation; and • Plot 22/155, 22/156 and 22/159 in order to access the converter station. Given NGET's landholdings and the interaction with EGL2, NGET's position is that the Order should be amended so that the grid connection cable infrastructure is limited to installation in New Road at Plot 22/170. NGET's understanding is that this is where the grid connection cable infrastructure would be installed in any event. The Applicant must not be permitted to acquire or extinguish the rights of NGET in respect of these parcels of land. NGET reserves the right to make further representations as part of the Examination process in relation to specific interactions with EGL2	

The Coal Authority

Table 2-16. Applicant's Responses to Relevant Representations – The Coal Authority

Examination Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
AS-021	Thank you for your notification of 25 January 2024 seeking the views of the Coal Authority on the above. The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas. We have reviewed the site location plan provided and can confirm that the site falls within the Coal Authority's defined Development Low Risk Area. On this basis we have no specific comments to make. However, in the interest of public safety, it is requested that the Coal Authority's Standing Advice note is drawn to the applicant's attention, where relevant.	The Applicant notes this comment.

2.2 Local Authorities

Table 2-17. Applicant's Responses to Relevant Representations – Local Authorities

Ref. No.	IP Name	Comments from Relevant Representations	Response to Relevant Representation
RR-089	East Riding of Yorkshire Council	The East Riding of Yorkshire Council (ERYC), together with North Yorkshire Council are the host authority for the East Yorkshire Solar Farm DCO (DCO) application. Under section 102(1)(c) of the Planning Act 2008, the ERYC are automatically Interested Parties for the duration of the examination and therefore do not need to register to participate. The majority of the 'order limits' of the DCO are within the administrative boundary of the ERYC.	The Applicant notes this comment.
RR-089	East Riding of Yorkshire Council	Thank you for the opportunity to submit the following Relevant Representation (RR). ERYC have liaised with the Applicants for some time and have provided comments throughout the pre-submission period. ERYC will provide detailed comments within its Local Impact Report (LIR) and may submit a Written Representation (WR) during the examination. The LIR will set out the views of the ERYC following a detailed appraisal of the DCO application.	The Applicant notes this comment.
RR-089	East Riding of Yorkshire Council	ERYC consider that an assessment of the following issues are pertinent to the consideration of the case, and a full assessment of these will follow in the LIR: Loss of Best and Most Versatile (BMV) Land, landscape and visual effects, the impact on living conditions including noise, glint and glare and air quality, ecology, biodiversity and trees, traffic and transport, the impact on PRoW, flood risk and drainage, archaeology, and heritage impacts. Detailed consideration is required of the individual impacts of the project, together with any cumulative impacts of other nearby solar farm applications.	The Applicant notes this comment. The Applicant is continuing to liaise with ERYC officers. The Applicant has carried out a full Environmental Impact Assessment (EIA) which is presented in the Environmental Statement (ES) **[APP-052 to APP-061, AS-014, APP-063 to APP-067, AS-016, and AS-018]** and its associated figures **[APP-133 to APP-299]** and appendices **[APP-071 to APP-132].** This provides a detailed assessment of the impacts of the Scheme including the matters identified by ERYC. The significant adverse effects of the Scheme identified by this assessment have been mitigated where practicable and there are limited residual significant adverse effects of the Scheme. Impacts on the local area and community have therefore been minimised as far as practicable.
RR-089	East Riding of Yorkshire Council	The Council reserves the right to amend its position or comments following detailed analysis. ERYC will continue to engage with the NSIP process and seek to work proactively with the Inspector and the Applicants in connection with this project.	The Applicant notes this comment. The Applicant is continuing to liaise with ERYC officers.
RR-282	North Yorkshire Council	North Yorkshire Council EYSF Relevant Representation – 08-03-2024 The following is the Relevant Representation from North Yorkshire Council. This, as per the guidance notes, is intended as a brief summary of the Council's position on key areas of the application as it relates to council services. We look forward to engaging further, throughout the examination.	The Applicant notes this comment.
RR-282	North Yorkshire Council	Highways and Transportation Impact of the project North Yorkshire Council as Local Highway Authority (LHA) has been consulted on this project which is to provide additional electricity to National Grid. The construction involves installing solar panels in land within East Riding	The Applicant notes this comment. The Framework Construction Management Plan **[APP-238]** (Framework CTMP) provides details of embedded mitigation measures that are proposed to prevent or reduce potential adverse

Ref. No.	IP Name	Comments from Relevant Representations	Response to Relevant Representation
		County Council. Work within North Yorkshire Councils area is confined to the grid connection corridor crossing fields near to Long Drax and the site of the existing Drax power station. The operation enters North Yorkshire to the east of Hemmingborough crossing the River Derwent near Hagthorpe Hall and then crosses the A63 Hull Road. At this point the developer wishes to create a new access on the southern verge of the A63 and construct a compound store near to this location creating a new access on a unadopted minor road to the north of A63. The grid connection corridor then heads south crossing the River Ouse near Drax Abbey Farm. After this point new accesses are to be created on Pear Tree Ave Carr Lane and New Road again to allow the corridor to access Drax Power Station which connects the project to the National Grid. A compound is to be form near Drax abbey Farm. Consultation with LHA The developer has consulted North Yorkshire Council on highway matters and officers have engaged with the developer from an early stage expressing concerns with the project as it entered the County. The A63 county road due to the traffic volumes on the road present the likely location where traffic congestion and road safety may be compromised and as part of the consultation the LHA offered feed back to the developer to improve the working environment and suggested how the site is to be manged which the developer has focused on and included as necessary. Therefore the authority, as with the rest of the network would expect the developer to continue to engage with officers as the work progresses, if the project is approved by planning inspector. The LHA wishes to be involved and believes the developer will agree to this approach, mindful that Traffic orders and street work notices will be required to undertake the work on the network.	effects associated with construction traffic on local roads in North Yorkshire. A detailed CTMP (which must substantially accord with the Framework CTMP) will need to be approved post consent prior to construction with the relevant local authorities which includes North Yorkshire Council. The detailed CTMP is secured by a requirement in Schedule 2 to the Draft DCO **[AS-008]**. The Applicant will continue to engage with North Yorkshire Council on highway matters. Article 8 (Street Works) of the Draft DCO **[AS-008]** includes powers to carry out street works and Article 15 (Traffic Regulation Measures) includes powers to implement traffic regulation measures required during construction which are equivalent to Traffic Regulation Orders made under the Road Traffic Regulation Act 1984. These powers are discussed in the Explanatory Memorandum to the Draft DCO **[AS-010]** and the Streets, Access and Rights of Way Plans Part 1 **[APP-009]** and Part 2 **[APP-010]** and the Traffic Regulation Measures Plans **[AS-005-007]** show the location of works. The Applicant therefore considers it has the necessary powers in the Draft DCO to carry out the works and not require additional powers to be applied for.
RR-282	North Yorkshire Council	Construction. The LHA agrees that the construction phase of the project will generate the most traffic and that construction of the solar farm within East Riding will create the most impact to the public highway. The construction may last for approximately 18 months and at peak times generate 500 vehicle trips per day over the whole site hence the Authority understands the impact to be low on the network within North Yorkshire. It is expected that vehicles used for construction will operate outside the peak times on the network further reducing any impact. The Applicant has stated that up to 75 Heavy Goods Vehicles (HGVs) per day will deliver equipment and materials to all the compounds within the scheme area. However no clear figures of the likely traffic generated by the project within North Yorkshire have been provided. The project within North Yorkshire will construct new accesses points which join the adopted highway all shall be design to the Councils standards The Authority does not wish to see loose material on or near the highway or debris of any kind. Over running of the verge must be avoided where possible and repaired as directed by the LHA when necessary. Once removed the LHA expects all points of access to be returned to grass verge or landscape as necessary. A.I.L are expected to access either Drax power station or Compound E along the A645 and New Road and	The Applicant notes that North Yorkshire Council accepts the methodology and assessment conclusions of Chapter 13: Transport and Access, ES Volume 1 **[APP-065]** which state that no significant residual effects are anticipated at any receptors within North Yorkshire. Details of construction traffic numbers are provided within Appendix 13-2 Traffic Flow Diagrams **[APP-110]**. The specific traffic survey location sites that indicate construction traffic flows within North Yorkshire are ATC 1, ATC 7, ATC 17, ATC 18 and ATC 19. Construction Worker, Construction HGV and Construction Tractor-Trailer movements at these locations over a 24-hour period are shown on pages 9, 10 and 11 of Appendix 13-2 Traffic Flow Diagrams **[APP-110]**. Movements during the network peak hours of 08:00-09:00 and 17:00-18:00 are shown on page 19 and movements during the peak construction hours of 06:00-07:00 and 19:00-20:00 are shown on page 24. The Applicant has prepared a series of access designs for the proposed works which are provided in Annex A of Appendix 13-5 of the Framework CTMP **[APP-238]**. These access proposals have been developed to accommodate the largest predicted vehicle movements required to facilitate the construction. The access proposals have been developed in accordance with the Design Manual for Roads and Bridges and have taken on board comments from North Yorkshire Council Highways

Ref. No.	IP Name	Comments from Relevant Representations	Response to Relevant Representation
		the LHA will expect to be consulted at each stage to effectively manage the road network. The developer has provided a framework construction management plan which as the project progresses will need amending to manage the project. North Yorkshire Council as LHA expects to be involved in this process allowing the authority to comment on all aspects of the project when considering its impact on the highway.	Department as part of ongoing dialogue prior to the DCO application submission. This dialogue agreed junction visibility splay parameters and resulted in an update to the distance set back for junction visibility. In respect to loose material and debris, the Applicant can confirm that wheel washing facilities will be provided within each Construction Compound as reported in Section 5.3.12 of the Framework CTMP **[APP-238],** with the access bellmouth surfacing specification to be agreed as part of detailed design. Pre and post construction road condition surveys will be undertaken at identified locations in coordination with the relevant LHA, as referenced in Section 5.2 of the Framework CTMP **[APP-238].** Access points for the Solar PV Site installed during the construction phase (either new accesses or modified/extended existing accesses) will remain in place throughout the operational phase. Accesses to the Grid Connection Corridor alone and other temporary construction accesses, may be modified/reduced in footprint to suit the operational phase; the specification of this reinstatement will be discussed with North Yorkshire as the relevant Highways Authority. The Applicant can confirm that no abnormal load manoeuvres are anticipated to be required to Compound E. The Framework CTMP **[APP-238]** will be developed further by the appointed contractor in consultation with the relevant highway authorities including North Yorkshire Council post consent prior to construction to secure the proposed commitments and mitigation measures. This detailed CTMP is secured through requirement 13 of Schedule 2 of the Draft DCO **[AS-008]** and must substantially accord with the Framework CTMP.
RR-282	North Yorkshire Council	Built Heritage Relevant Listed Buildings and Scheduled Ancient Monuments have been identified and the search area is considered to be satisfactory. The grid connection corridor would result in disturbance to the setting and therefore the significance of some of the identified heritage assets during the construction phase. The proposal to introduce solar panels on mass coupled with their closeness to acknowledged heritage assets is considered to amount to harm to the setting and therefore significance of heritage assets. As harm has been acknowledged the justification for these works and then in turn harm needs to be outweighed by the public benefit of the proposal.	The Applicant notes that North Yorkshire Council accept that harm has been acknowledged, in the assessment of significance on designated and non-designated heritage assets, as set out in Chapter 7: Cultural Heritage, Volume 1 ES **[APP-059]** (see 3.2.3 below) which concludes that due to the temporary nature of the impact the effects, which range from negligible to minor adverse, are assessed to be not significant. An assessment of potential harm arising from the temporary construction activities is summarised in a Heritage Statement, which is presented in Appendix C of the Planning Statement **[APP-233].** Section 6.10 of the Planning Statement **[APP-233]** discusses the heritage impacts and compliance with policy tests. This concludes that the significant public benefits of the Scheme presented in Section 5 and Section 6.2 of the Planning Statement clearly and demonstrably outweigh the temporary less than substantial harm to designated heritage assets by construction activities in their setting and the very small scale permanent harm to the non-designated asset of schedulable quality that would result from the Scheme. The Scheme, therefore, meets the heritage policy tests set out by NPS EN-1, and local planning policy. The assessment of operational effects on designated heritage assets in section 7.7 of the ES **[APP-059]** (the closest listed building is located 1 km from the Solar PV Site) concludes that the

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			land within the Order limits does not make an important contribution to their setting, and therefore to their heritage value. Furthermore, the site walkover and setting assessment detailed in section 4.3 of the Cultural Heritage Desk-based Assessment **[APP-080]** confirms that the distances involved from the Solar PV Site, and the screening from intervening hedgerows, would preclude the operational Scheme introducing a magnitude of change that would detract from the listed buildings' settings. The assessment concludes there would be no impact and no effect, and therefore no potential for harm.
RR-282	North Yorkshire Council	Cumulative Impacts Volume 1, Chapter 17: Cumulative Effects and Interactions (doc ref: APP-069). It is noted that paragraph 17.3.8 refers to Policy SG10 (Low Carbon and Renewable Energy) of the Selby District Council Local Plan Publication Version 2022. This is an emerging Development Plan document. On 17 September 2019, the former 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. The Council's intention is to consult on a further Revised Pre-Submission Publication (Regulation 19) Consultation in Spring 2024 prior to the submission of the plan to the Secretary of State for Examination. In accordance with paragraph 48 of the NPPF, given the stage of preparation following the consultation process and depending on the extent of unresolved objections to policies and their degree of consistency with the policies in the NPPF, the policies contained within the emerging Local Plan can be given weight as a material consideration in decision making. The equivalent local policy within the adopted Development Plan for the Selby area of North Yorkshire Council is Policy SP17 (Low Carbon and Renewable Energy) of the Core Strategy Local Plan.	The Applicant notes this comment. Compliance with both Draft and adopted planning policy is considered within the Planning Statement **[APP-233]**.
RR-282	North Yorkshire Council	Volume 2, Appendix 17-1: Shortlist of Cumulative Schemes (doc ref: APP-125). ID64 – it is correct that this application was refused, however a resubmission has been made, planning reference ZG2023/0720/FULM, which should be included within the short list. ID74 – The status of this application has evolved since the document was prepared. Whilst still pending decision, the application was been taken to Strategic Planning Committee in January 2024 and there was a resolution to grant subject to conditions and negotiation and completion of a S106 agreement securing management and maintenance of off-site landscaping and sky lark plots. The long list cannot be located.	The Applicant notes the changes identified with regard to the shortlist, however these do not alter the cumulative assessment presented in Chapters 6 to 18 of the ES **[APP-058, APP-059, APP-060, APP-061, AS-04, APP-063, APP-064, APP-065, APP-066, APP-067, AS-016, APP-069 and AS-018]** therefore the short list will not be updated**.** The cumulative assessment is focused on assessing the impact of the developments which have the potential to generate significant cumulative effects. The long list of other developments initially identified for the cumulative effects assessment was provided with the Preliminary Environmental Information (PEI) Report published for consultation in May 2023. As part of the development of the ES, any developments of a nature or scale without the potential to result in likely significant cumulative effects were excluded, following discussion with the local planning authorities which included North Yorkshire Council and consideration of the likely zone of influence for each environmental topic. The long list of cumulative developments has informed the shortlist, which is presented in Appendix 17-1, ES Volume 2 **[APP-125]**). The long list itself was not included in the ES, given it was not considered to add value to the assessments.

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RR-282	North Yorkshire Council	Environmental Health Noise and Vibration. While the literature captures 55 noise-sensitive receptors for assessment, please note that I have only considered those within the boundary of North Yorkshire Council in my response (R37 & R38). Construction Noise/Vibration. Existing background sound levels are well defined (Appendix 11-3: Baseline Noise Survey ref: EN010143/APP/6.2 [N16]) and support the alignment of BS5228-1:2009+A1:2014 Category A noise threshold values with the lowest observed adverse effect level (LOAEL) (Table 11-6). Construction noise is assessed and predicted to adhere to LOAEL at R37 & R38 (Table 11-13), which was derived through noise modelling of input data set out within Appendix 11-4: Construction and Operational Noise Assessment ref: EN010143/APP/6.2. A Construction Environmental Management Plan (CEMP) is secured through DCO requirement 11 and, amongst other Best Practicable Means (BPM) measures, there is prior commitment to restrict core working hours to between 07:00 and 19:00 Monday to Friday, 07:00 and 13:00 Saturday and not at all on Sundays and Bank Holiday. There is a caveat for emergency works which should be clearly defined in the CEMP. Overall, taking into account the aforementioned, there are no objections relating to construction noise/vibration impacts. Operational Noise/Vibration. Significant operational noise/vibration impacts at receptors R37 and R38 are not envisaged due to distances from noise-generating fixed plant installations.	The comment accurately discusses the conclusion of Chapter 11: Noise and Vibration of the ES **[APP-063]**, which identifies no significant adverse effects during construction or operation of the Scheme. Reference to emergency works is made in the Framework CEMP **[APP-238]**.
RR-282	North Yorkshire Council	Ground Conditions Chapter 16 of the ES and the Phase 1 Preliminary Risk Assessment Report provide a good overview of the site's history, its setting, and its potential to be affected by contamination. The proposal to carry out intrusive site investigation and GQRA in the areas of potential contamination is considered acceptable. If contamination is found, appropriate remediation/mitigation measures will be required to manage the potential risks from land contamination. Following implementation of these measures, it is agreed that no significant effects associated with ground conditions are likely.	The Applicant notes this comment. The Framework CEMP **[APP-238]** presents outline mitigation measures for the unlikely event if contamination were to be identified onsite, which will be built upon in the detailed CEMP post consent. The detailed CEMP is secured by Requirement 11 in the Draft DCO, which requires that it must substantially accord with the Framework CEMP **[APP-238].**
RR-282	North Yorkshire Council	Archaeology The ES includes a Chapter on the Historic Environment (Chapter 7). This chapter is supported by an archaeological desk-based assessment (Appendix 7.2) and the results of archaeological geophysical survey (Appendix 7.3). There is a report on archaeological trial trenching (Appendix 7.4) but this falls outside of the North Yorkshire Council area. Together, these documents represent an adequate assessment of the proposal on heritage assets of archaeological interest. Whilst it would have been desirable to carry out trial trenching within North Yorkshire the proposal is limited to the cable connection meaning that very significant impact is not expected. Whilst the cable connection may have a localised impact in places it's linear nature will mean that it is unlikely to destroy an archaeological site in its entirety and should not prejudice our ability to understand such sites in the future. In addition, large areas adjacent to the river are likely to have	The Applicant notes this comment.

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		considerable accumulations of largely sterile alluvial silts and other expected archaeological features are limited to drainage and agriculture associated with the medieval and later use of the landscape. Although of interest these types of remains are not of such significance as to warrant a higher level of assessment. The Framework Construction Environment Management Plan submitted with the DCO includes proposed mitigation in relation to heritage assets of archaeological interest. I am pleased to see that an Archaeological Clerk of Works will be appointed to oversee the implementation of this mitigation. I support the framework as set out in the CEMP.	
RR-282	North Yorkshire Council	Landscape Summary These comments principally relate to Chapter 10 Landscape and Visual Effects in the Applicant's EIA, but comments may overlap with other topic areas such as Chapter 16 Other Environmental Topics - Glint and Glare, and Chapter 17 Cumulative Effects and Interactions. These comments are based on the current published details within the North Yorkshire Council area, principally focussed within the Grid Connection Corridor. The Works within the North Yorkshire Council area are shown on Works Plan Sheets 18 – 22 (Document Reference: EN010143/APP/2.3). We have concerns which mainly relate to protection and retention of existing vegetation within the Grid Connection Corridor and the lack of certainty for this to be secured through the Environmental Mitigation and Commitments Register and DCO. The scheme generally allows a Site with wide spatial working area for the installation of the Grid Connection Cables, typically 30m wide corridor, where this could be widened or narrowed in places to accommodate operations (page 2-29 Document Reference: EN010143/APP/6.1). We would wish to see greater certainty for protection and retention of existing vegetation and in the agreement of final routing options within the Grid Connection Corridor and a landscape framework capable of minimising potential vegetation loss and offsetting the wider cumulative effects. Cumulative Effects There are a number of large energy projects planned in the study area utilising the connection to the National Grid Substation at Drax. Some of these are in proximity to and overlap with this DCO Application site boundary. Collectively these have potential to radically change land use within several km radius of the Grid connection point at Drax Power Station, for a long-period of time (40+ years). The existing landscape infrastructure, woodlands and hedgerows is extremely important in screening the existing development at Drax Power Station and in helping to mitigate, screen and buffer the effects of existing and proposed energy-related development in this area. Replacement planting would take many years to become established if this had to be replaced and reinstated. There is potential for ongoing erosion of the landscape baseline in this area over a number of years, therefore we would wish to see greater certainty for protection and retention of existing vegetation and in the agreement of final routing options, recommend that the landscape strategy should	The Applicant has updated the Framework LEMP as part of the Deadline 1 package of information to make it clear that areas of existing vegetation within the Grid Connection Corridor, specifically in proximity to Drax Power Station, will be retained and protected. The update sets out the measures to be undertaken to minimise impacts upon existing vegetation and hedgerows within the Grid Connection Corridor including, where possible, the reduction in working width to approximately 5 metres when the route passes through vegetation and hedgerows. The Applicant will determine the route of the Grid Connection Cables following trial trenching, as set out in the Overarching Written Scheme of Investigation (submitted to examination at Deadline 1), and any ground investigation work is undertaken as described in Table 14 of the Framework CEMP **[APP-238]**. The update has also been made to the Landscape Masterplan presented at Appendix A of the Framework LEMP **[APP-246]** to illustrate the retention of existing vegetation. These updates are being submitted into the examination at Deadline 1. The protection of trees in relation to the route of the Grid Connection Cables is addressed in detail in Section 4.5 of the Arboricultural Impact Assessment (AIA) report **[APP-102]** and this sets out how the design will be amended where possible to avoid cable routes or access routes incurring within the Root Protection Area (RPA) of retained tree features and where avoidance is not possible how it will be managed in principle. The final extent of incursions and the methodology for any such work will be detailed as part of an Arboricultural Method Statement which will be secured as part of the detailed CEMP. This is described in Table 6 of the Framework CEMP **[APP-238]**. The detailed CEMP and a detailed LEMP will need to be approved post consent prior to construction by the relevant local authorities. These detailed management plans must substantially accord with the framework management plans the Applicant has prepared and this is secured by requirements in Schedule 2 to the Draft DCO **[AS-008]**. The assessment within Chapter 10: Landscape and Visual Amenity of the ES **[APP-063]** has been undertaken on the assumption that areas of woodland along the Grid Connection Corridor such as those close to Drax Power Station will be retained and that the majority of hedgerows and trees, where possible, would be retained or a section of approximately 5m would be removed, in accordance with the reduction of working width through vegetation and hedgerows being committed to by the Applicant. Within Chapter 10: Landscape and Visual Amenity of the ES **[APP-063]**, paragraph 10.5.83 states that the potential viewpoint to the south of Drax, along New Lane would not experience views of the Grid Connection as a result of the retention of the mature vegetation located along Wren Hall Lane and Carr Lane.

Ref. No.	IP Name	Comments from Relevant Representations	Response to Relevant Representation
		consider a landscape framework capable of minimising this erosion and offsetting the wider cumulative effects. Landscape and Visual Assessment (LVIA) Certain assumptions have been made within the LVIA, but it is not clear that a worse-case scenario has been taken into account for landscape, visual and cumulative effects, and there is potential for important woodland and hedgerow vegetation to be cleared within the Grid Connection Corridor and around Drax Power Station. There are contradictions between the parameters and level detail considered in the assessments, and the wider principles assumed and secured through the DCO. The LVIA includes statements that no vegetation will be lost as a result of the scheme (e.g. paragraph 10.5.83 of the LVIA). However, trees and hedgerows are shown for removal on the Tree Protection Plans, and generally allowed within the DCO. Detailed routing for the connection cables has been considered within the Arboricultural Impact Assessment and Tree Protection Report (Document Reference: EN010143/APP/6.2) with red, yellow and green routing options being shown in detail, but these are not secured in the DCO. The DCO secures only broad principles for habitat reinstatement within a wider Proposed Cable Corridor, as shown on the Works Plans (Document Reference: EN010143/APP/2.3) and on the Landscape Masterplan within the Framework Landscape and Ecology Management Plan (Document Reference: EN010143/APP/7.14). Similarly, the Environmental Mitigation and Commitments Register (Document Reference: EN010143/APP/6.5) outlines commitments for protection and reinstatement of vegetation through Requirements 5 Detailed Design for Approval, Requirement 6 LEMP, requirement 6 CEMP, but these link only to the broader principles of the relevant Frameworks. LV-03 within the EMCR set out minimum offsets for the layout of the scheme in order to protect woodland, hedgerows and individual trees, but it is assumed that this is meant within the layout for the PV Solar Site, rather the Grid Connection Corridor. Proposed and existing landscape features between the plan and plan key are also confusing, inconsistent and unclear. Landscape mitigation and principles shown on the Landscape Masterplan are minimal in content and lacks commitment given the overall scale of the Works. The plans provide no explanation of how potential clearance works would be minimised, mitigated or reinstated.	The assessment of cumulative impacts of the Scheme with other existing and proposed energy developments as well as other developments in the locality is set out in chapters 6 – 16 of the ES **[APP-058 to APP-061, AS-014, APP-064 to APP-067, and AS016]** and is summarised in Chapter 17: Cumulative Effects and Interactions of the ES **[APP-069].** No new likely significant adverse effects are anticipated to arise from the Scheme when considered alongside those effects generated by nearby developments. The Scheme is anticipated to have a significant beneficial effect upon the functional improvement of soil resources that would follow with the conversion of arable land to grassland when considered with the other solar farm proposals in the area. The Framework Landscape Masterplan will be updated following updates to the Biodiversity Net Gain (BNG) Assessment, and proposed and existing features between the plan and key will be updated to make it clearer. This will be submitted during Examination.
RR-282	North Yorkshire Council	Biodiversity The approach to ecological assessment is supported as it follows current best practice guidance. The Council generally agree with the assessment which appears reasonable in terms of the location, type and scale of the proposed works. We are fully supportive of the intention of this project to provide a minimum of 10% biodiversity net gain in line with current guidance set out in the Environment Act 2021. We support use of the most up to date version of the Defra Biodiversity Metric in presenting data on biodiversity losses and gains. The proposals for BNG should sit within a wider landscape and biodiversity strategy which has clear objectives and sets out how monitoring and management will be delivered in the long term.	The Applicant notes this comment. The Applicant has prepared a Framework LEMP **[APP-246]** and BNG assessment **[APP-243]**. These are being updated for the Examination and have been submitted at Deadline 1. Measures set out in the BNG assessment **[APP-243]** are incorporated in the Framework LEMP **[APP-246].**

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RR-208	Leeds City Council	Leeds City Council forms a neighbouring authority to the development project insofar as the proposed grid connection route and point of connection is located at Drax in Selby. For this reason and given the substantial geographical distance between Leeds and the main part of the project within East Yorkshire, we do not expect the project to result in any adverse impact of significance on the Leeds district. We note that the Applicant has had regard to our pre-application consultation advice which referred to the protection of i) bird migration routes, ii) mineral resources of local and national importance, and iii) private and public aviation interests. For these reasons, Leeds City Council is not likely to provide further comment on the project and will default to the affected host local authorities of North Yorkshire Council and East Riding of Yorkshire Council to provide expert comments in assisting the examination process.	The Applicant notes this comment.
RR-149	Hull City Council (Hull City Council)	The Council wishes to register its support for the proposed development in principle. The Council declared a Climate Emergency in March 2019, setting targets for the city and reflecting our key ambitions for sourcing energy in the future. This project has the potential to support the City's and HEYLEP's net zero, clean growth economy, and renewables sector priorities, and contribute to a vital part of the solution to the UK's net zero 2050 target.	The Applicant notes this comment.
RR-149	Hull City Council (Hull City Council)	The application is accompanied by a Framework Skills, Supply Chain and Employment Plan (Document Reference: EN010143/APP/7.15). The document defines a study area based upon a 60-minute drive time, within which the city of Hull squarely sits, and from within which it is estimated that 45% of construction staff could be sourced. Whilst reference is made to the York, North Yorkshire and East Riding's Local Enterprise Partnership, not so the Hull and East Yorkshire Local Enterprise Partnership (HEY LEP), nor its Employment & Skills Strategy 2021-2026, or Hull & East Yorkshire Careers Hub. It is noted that Jobcentre Plus facilities within the study area but outside of the host authorities are referenced, but not Jobcentre Plus Hull, nor Hull City Council's Employment Hub. Similarly for apprenticeship training providers, for which Hull-based courses delivered by such as Hull Training and Adult Education, and Hull College of Further Education should be considered for inclusion.	The Applicant acknowledges that the city of Hull sits within the 60 minute drive time of the Order limits which has been defined as the principal labour market catchment area for the Scheme in the Framework Skills, Supply Chain and Employment Plan (SSCEP) **[APP-247]**. Strategies of the Hull and East Yorkshire Local Enterprise Partnership will be fully reviewed and reflected within the detailed SSCEP as relevant when the detailed SSCEP is developed. Requirement 16 in Schedule 2 of the Draft DCO **[AS-008]** secures the detailed SSCEP which must be substantially in accordance with the Framework SSCEP **[APP-247]**. The comments regarding Jobcentre Plus Hull, Hull City Council's Employment Hub, and Hull-based apprenticeship and training providers are also noted. The Applicant will consider including these agencies within any programme of engagement undertaken as part of the development of the detailed SSCEP.

2.3 Parish Councils

Table 2-18. Applicant's Responses to Relevant Representations – Parish Councils

Ref. No.	IP Name	Comments from Relevant Representations	Response to Relevant Representation
RR-117	Foggathorpe Parish Council	The size of the project devasting the local community and area turning it into a massive industrial site using valuable agricultural land for some 40 years that will never recovery. The residents will have panels very close to some properties with two villages surrounded which will massively effect there wellbeing (it has already for some residents). We are also concerned re the various types of pollution re noise, light, traffic and possible radiation.	The Government has identified through its energy policy, most recently in the Overarching National Policy Statement for Energy EN-1 and National Policy Statement for Renewable Energy EN-3, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's Statement of Need **[APP-232],** this includes low carbon energy generation using solar technology. Developing the Scheme at this size will therefore be an important contribution to meeting this need. The Applicant acknowledges that agricultural land will be used for the Scheme however respectfully disagrees that this is valuable for agricultural production and will never recover. Agricultural land quality was a consideration of the Applicant's site selection process as described in Chapter 3: Alternatives and Design Evolution within the ES **[APP-055]**. The Scheme is located mostly on lower quality agricultural land, with the majority of the Scheme being on land not classed as BMV. For the Solar PV Site, 92.8% of the land used is non BMV land. The Applicant's discussions with farmers who farm areas of the Solar PV Site have also identified that this land is difficult to farm. In accordance with NPS EN-1 paragraph 5.11.3 and NPS EN-3 paragraph 2.10.29 the Applicant considered the use of previously developed land and did not identify any available land within its area of search of an appropriate size to locate the Scheme. In accordance with NPS EN-1 paragraph 5.11.12 and NPS EN-3 paragraphs 2.10.29 to 2.10.34 the Applicant has taken a sequential approach to the use of agricultural land considering whether land of lower grade is available and suitable. Following the identification of an area of search derived from the point of connection at the National Grid Drax Substation the Applicant did not identify any alternative sites which would be of lower grade agricultural land (compared to the majority of the Order limits) that were available or considered suitable for the Scheme and its objectives. The vast majority of agricultural land within the Order limits would also be available for return to its existing agricultural use following decommissioning of the Scheme. Chapter 15: Soils and Agricultural Land within the ES **[APP-067]** concludes that a very small amount (0.41 ha) of BMV Subgrade 3a agricultural land for tree planting would be permanently removed from agricultural use but would provide a permanent ecological benefit. In relation to non-BMV land, 8.97 ha of Subgrade 3b agricultural land would be permanently removed from agricultural use as a result of tree and hedge planting, and further 2 ha of Subgrade 3b agricultural land would be permanently removed as a result of the potential retention of the Grid Connection Substations and associated accesses. In addition, the conversion of arable land to grassland during the 40 year operational period has the potential to accrue improvement to soil function over a large area. The Scheme design is the result of an iterative design process which delivers the Scheme's functionality, the generation of a large amount of renewable electricity using single axis tracker solar technology, whilst addressing the local context and setting within which it is located.

Ref. No.	IP Name	Comments from Relevant Representations	Response to Relevant Representation
			The Applicant's design team has worked collaboratively to provide an integrated and responsive design which has been informed by the process of environmental impact assessment, statutory consultation and stakeholder engagement. As set out in the DAS **[APP-234]** design objectives have guided the design response from an early stage to develop a good design that balances the need to maximise renewable energy generation from the Scheme, whilst minimising potential adverse impacts and providing mitigation and enhancement measures where practicable. This has resulted in a Scheme which, with the implementation of mitigation, avoids residual significant adverse effects in relation to designated landscapes; biodiversity sites; protected species or habitats; agricultural land; heritage assets; flood risk; water quality; access; and land uses within the local area. Impacts on the local area and community have therefore been minimised as far as practicable. The Applicant acknowledges that the operation of the Scheme will result in residual significant adverse effects upon the local landscape character and a small number of visual receptors, as presented in the Landscape and Visual Amenity Assessment within the ES **[AS-014]**. However, the Applicant has carefully designed the Scheme to ensure landscape and visual impacts are minimised as far as practicable by proposing a comprehensive landscape and ecological design and increased connectivity and local access through the landscape as discussed in the DAS **[APP-234]** and in the Framework LEMP **[APP-246]**. Both documents include the Framework Landscape Masterplan illustrating this design. One of the Scheme's design objectives is to ensure the design responds sensitively to residential properties in proximity to the Scheme regarding visual impact, noise and lighting. This design approach is in accordance paragraph 5.10.22 of NPS EN-1. To achieve this, the Scheme design therefore retains existing vegetation as far as practicable and provides carefully designed planting to provide screening. The design also incorporates buffers from residential properties to the solar PV infrastructure which are shown on the Framework Landscape Masterplan and the Applicant has committed to positioning noise emitting Field Stations 250 metres (m) or further from residential properties to avoid disturbance from operational noise. The two Grid Connection Substations proposed as part of the Scheme are also greater than 250 m from residential properties. The Scheme is also not proposing any visible lighting from CCTV or artificial lighting for security purposes. These design principles are set out in the Outline Design Principles Statement **[APP-235]**. The detailed design for the Scheme, which will need to be approved post consent prior to construction by East Riding of Yorkshire Council and North Yorkshire Council (the relevant local authorities), must be in accordance with the design principles set out in the Outline Design Principles Statement **[APP-235]** and this is secured by a requirement in Schedule 2 to the Draft DCO **[AS-008]**. Chapter 11: Noise and Vibration within the ES **[APP-063]** describes the assessment of noise during construction, operation and decommissioning. No significant adverse effects are identified for residents within the Foggathorpe Parish. The Applicant recognises that the potential for future environmental changes associated with the Scheme during construction, operation and decommissioning are currently a source of concern for local residents. To address this concern, the Applicant has undertaken a comprehensive and robust Environmental Impact Assessment so that any likely significant effects of the Scheme can

Ref. No.	IP Name	Comments from Relevant Representations	Response to Relevant Representation
			be identified and mitigated. Chapter 14: Human Health within the ES **[APP-066]** assesses potential effects of the Scheme on health and wellbeing of local residents. The assessment takes a holistic approach to health and considers a wide range of health determinants which are relevant to quality of life and amenity. The assessment considers elements of the Scheme which could affect mental health (for example changes in landscape and visual amenity, noise, access to open space and employment) as well as physical health (for example associated with air pollution and access to healthcare facilities). No significant adverse effects are identified with regards to human health. A full and detailed assessment of potential traffic and transport impacts from construction at sensitive receptors has been undertaken within Chapter 13: Transport and Access of the ES **[APP-065]**. The conclusions (reference to Section 13.7) indicate that significant adverse effects would only be expected in one location (B1228 between B1230 and Brind Lane junctions). No significant adverse effects would be expected at any other locations. Any impacts (including at the B1228 between B1230 and Brind Lane junctions) would be temporary and would be managed through the embedded mitigation measures. The Framework CTMP **[APP-238]** provides full details of embedded mitigation measures that are proposed to prevent or reduce potential adverse effects associated with construction traffic on local roads. A detailed CTMP (which must substantially accord with the Framework CTMP) will need to be approved post consent prior to construction with the relevant local authorities and this is secured by a requirement in Schedule 2 to the Draft DCO **[AS-008]**. Measures to minimise community disturbance from noise, lighting and traffic and minimise impacts on visual amenity as a result of the Scheme are provided in the Framework CEMP **[APP-238],** the Framework CTMP **[APP-238]** and the Framework OEMP **[APP-239]**. Detailed management plans will need to be approved post consent prior to construction by the relevant local authorities. These detailed management plans must substantially accord with the framework management plans and this is secured by a requirement in Schedule 2 to the Draft DCO **[AS-008]**. Regarding 'radiation', the Applicant understands this relates to electric and electro-magnetic fields. Section 16.8 of Chapter 16: Other Environmental Topics, ES Volume 1 **[AS-016]** provides an assessment of the potential impacts associated with Electric and Electro-Magnetic Fields and concludes that no significant adverse effects are anticipated. All electric appliances emit electric and magnetic fields (EMF). Solar PV panels emit EMF in the same extremely low frequency ranges as electrical appliances and wiring found in most houses and buildings. Cables would be installed at a minimum of 10 m from the façade of any residential dwelling, as confirmed in the Outline Design Principles Statement **[APP-235]** (which is secured by a requirement in Schedule 2 to the Draft DCO **[AS-008]**). Therefore, no significant adverse effects to residential receptors from electric and electro-magnetic fields are predicted to occur.
RR-341	Spaldington Parish Council	As acting clerk to Spaldington Parish Council I am aware that some residents will have solar panels to 2 or 3 sides of their properties with very little buffer space. The screening suggested by the developers has not been properly detailed in the application. Is it to be mature planting or whips? The hedges in this area are species rich and do not need disturbing. Any further planting would need to fit that same criteria and the developer has not confirmed that this will be done. The hedgerows are alive with wildlife and as	The Government has identified through its energy policy, most recently in the Overarching National Policy Statement for Energy EN-1 and National Policy Statement for Renewable Energy EN-3, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's Statement of Need **[APP-232]**, this includes low carbon energy generation using solar technology. Developing the Scheme at its proposed size will therefore be an important contribution to meeting this need. As discussed in the Statement of Need **[APP-232]** the Applicant recognises that decentralised energy generation on roof tops has an important role to play in decarbonisation, however on its own, smaller scale solar, including rooftop solar, is not

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		such should not be disturbed. The area is a haven for owls, how will they hunt for food in a landscape covered in solar panels which are of a size which is unprecedented in this area. The materials used are a magnet for thieves and residents are concerned about the impact the build of the solar farm will on their own residential security. Flooding is another issue residents are concerned about. The dykes are full after this years rainfall to the point where some gardens are flooded. Will this development add to residents concern about flooding. Increased traffic will cause problems for residents on these single track roads. With the area already having a windfarm and an (Anaerobic Digestion) AD plant the addition of a large scale solar farm will in effect turn a rural landscape into an industrial landscape. There is no logic to the pattern of the solar farm. It is spread out and not all farmers/landowners in the area appear to have been approached by the developer. Had they been then the impact may not have been as great as it may have been contained in a more suitable area away from residential properties. The roads in the area are single track and unsuitable for heavy vehicles. The areas utilities are laid in the verges and residents have already suffered during previos developments with loss of telephone, broadband, electric and water despite reassurances that this wouldn't happen. The demographic of Spaldington is such that at least a third of the residents work from home and therefore need full access to the utilities with no breaks. Residents have either been born and brought up in the area and appreciate the peace and quiet, the plethora of wildlife, the sense of community and access to a good footpath network to name but a few or have moved into the area for the very same reasons. Noise concerns have been raised by residents both before and after the build from excess traffic and the panels and sub stations. The developers have failed to address these concerns adequately. Piling has been discussed as a method to be used during the build but again the noise issue has not been adequately dealt with. many properties in the area are of an age where they were built without proper foundations and residents are worried about how piling and excess traffic on unsuitable roads will affect their properties. Again these issues have not been addressed by the developer. The Chair of Spaldington Parish Council has already put forward residents concerns. Spaldington Parish Council are very concerned about this application as we believe it is far too big covering over 3000 acres of productive farmland and will effectively	likely to deliver a sufficient total capacity at the required pace and at an affordable cost to meet the Government's targets. **Site selection and land use** The Applicant has set out its rationale for selecting the Solar PV Site in Chapter 3: Alternatives and Design Evolution within the ES **[APP-055]**. This explains the stages and the main considerations which have influenced the Applicant in how it has selected the land for the Scheme. For the Solar PV Site this has included seeking to avoid environmental and land use constraints and taking into consideration other criteria such as topography; field pattern and arrangement; land use conflict, as well as land availability. The Applicant acknowledges that agricultural land will be used for the Scheme. Agricultural land quality was a consideration of the Applicant's site selection process. The Scheme is located mostly on lower quality agricultural land, with the majority of the Scheme being on land not classed as Best and Most Versatile (BMV). For the Solar PV Site, 92.8% of the land used is non BMV land. The Applicant's discussions with farmers who farm areas of the Solar PV Site have also identified that this land is difficult to farm. In accordance with NPS EN-1 paragraph 5.11.3 and NPS EN-3 paragraph 2.10.29 the Applicant considered the use of previously developed land and did not identify any available land within its area of search of an appropriate size to locate the Scheme. In accordance with NPS EN-1 paragraph 5.11.12 and NPS EN-3 paragraphs 2.10.29 to 2.10.34 the Applicant has taken a sequential approach to the use of agricultural land considering whether land of lower grade is available and suitable. Following the identification of an area of search derived from the point of connection at the National Grid Drax Substation the Applicant did not identify any alternative sites which would be of lower grade agricultural land (compared to the majority of the Order limits) that were available or considered suitable for the Scheme and its objectives. The vast majority of agricultural land within the Order limits would also be available for return to its existing agricultural use following decommissioning of the Scheme. Decommissioning of the Scheme after 40 years is required and secured via secured by a requirement in Schedule 2 of the Draft DCO **[AS-008]**). The Scheme is therefore a long term temporary use. Chapter 15: Soils and Agricultural Land within the ES **[APP-067]** concludes that a very small amount (0.41 ha) of BMV Subgrade 3a agricultural land for tree planting would be permanently removed from agricultural use but would provide a permanent ecological benefit. In relation to non-BMV land, 8.97 ha of Subgrade 3b agricultural land would be permanently removed from agricultural use as a result of tree and hedge planting, and further 2 ha would be permanently removed from agricultural use as a result of the potential retention of the Grid Connection Substations and associated accesses. In addition, the conversion of arable land to grassland during the 40 year operational period has the potential to accrue improvement to soil function over a large area. **Design**

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		turn our rural landscape into an industrial one. This huge development will engulf 5 rural villages including Spaldington. While we understand the importance of renewable energy, this particular project will have devastating consequences for our local environment and wildlife. We fear that it will cause excess traffic, flooding, disruption and destruction of farming land - all vital aspects that make up the fabric of our community. A number of our residents will be surrounded, on 2 or 3 sides of their properties, with very little buffer space between their homes and the solar panels. We are worried about the effect on their quality of life. Many of them have chosen to live in the countryside, to be away from the noise and stress of living in an urban environment, but with this development the tranquillity of the area could be destroyed permanently. Despite the assurance that the 40 year life of the solar panels is temporary we do not agree that 40 years is temporary – it is the remaining life left of many of our residents. In addition, the cumulative effect on the local landscape will be enormous. The Parish already have a large scale Wind Farm and a 250.000 tones a year AD Plant and both are known to cause a noise nuisance. The Parish Council have recently been approached by a developer regarding building a 350 acre Solar Farm along side the existing AD Plant. Why has this Parish suddenly become a hot spot when is it going to stop. Its clear that residents welfare and quality of life is not being considered. We believe that if this application was in several smaller applications rather than one huge one it is likely that not all of them would be approved on the grounds of cumulative effect. We find that there appears to be no logic in the selection of fields, and it seems that they have been chosen on the basis of which landowner was prepared to get involved rather than the suitability of the location. This whole development is piecemeal and could have been designed much more efficiently. We also feel that there are many roof top locations on warehouses, factories etc and brownfield sites that would be much more suitable. The roads all around the designated site are single track roads bordered by a number of ancient hedgerows and trees some of which are now in danger of being removed. The suggested planting would not mature in the 40 year lifespan of the solar panels so should not be used as a key point to approving the application as surely if trees and hedges are being removed they should be replaced with mature trees and hedgerows – not saplings. The current roads cannot support hundreds of heavy lorries in addition to the usual traffic without having a serious adverse effect on the local community. Many of the verges contain utilities beneath them such as water, electricity and telephone cables. The proposed traffic management scheme with road closures and traffic lights will seriously disrupt the daily lives of residents, local	The Scheme design is the result of an iterative design process which delivers the Scheme's functionality, the generation of a large amount of renewable electricity using single axis tracker solar technology, whilst addressing the local context and setting within which it is located. The Applicant's design team has worked collaboratively to provide an integrated and responsive design which has been informed by the process of environmental impact assessment, statutory consultation and stakeholder engagement. As set out in the DAS **[APP-234]** design objectives have guided the design response from an early stage to develop a good design that balances the need to maximise renewable energy generation from the Scheme, whilst minimising potential adverse impacts and providing mitigation and enhancement measures where practicable. This has resulted in a Scheme which, with the implementation of mitigation, avoids residual significant adverse effects in relation to designated landscapes; biodiversity sites; protected species or habitats; agricultural land; heritage assets; flood risk; water quality; access; and land uses within the local area. Impacts on the local area have therefore been minimised as far as practicable. The Applicant acknowledges that the operation of the Scheme will result in residual significant adverse effects upon the local landscape character and a small number of visual receptors, as presented in the Chapter 10: Landscape and Visual Amenity Assessment within the ES **[AS-014]**. One of the Scheme's design objectives is to ensure the design responds sensitively to residential properties in proximity to the Scheme regarding visual impact, noise and lighting. This design approach is in accordance with 5.10.22 of NPS EN-1 and paragraph 2.10.131 to 2.10.133 of NPS EN-3. To achieve this, the Scheme design therefore retains existing vegetation as far as practicable and proposes carefully designed planting to provide screening. The design also incorporates buffers from residential properties to the solar PV infrastructure. Details of the proposed screening and buffers including existing vegetation to be retained and proposed planting are provided in the Framework LEMP **[APP-246]** and illustrated on the Framework Landscape Masterplan included as Appendix A of the Framework LEMP **[APP-246]** and Section 5.4 of the DAS **[APP-234].** Existing hedgerows will be retained as far as practicable. Buffers of grassland, native scrub, woodland and traditional orchard will be created around the edge of the Solar PV Areas and other larger areas of grassland will be created, which will offer habitat for wildlife, including foraging habitat for owls. Section 6 of the Framework LEMP **[APP-246]** also discusses the long term management and maintenance of proposed planting. This explains that opportunities for planting of more mature stock, for example, ready hedges and larger specimen trees will also be explored with landowners, targeting this to mitigate effects on the most sensitive receptors at the earlier opportunity such as during construction. The Scheme incorporates fencing and security design measures which will mitigate against the risk of criminal activity. This includes internal facing closed circuit television (CCTV) systems which use infra-red technology avoiding the need for lighting. These will be installed around the perimeter of the operational areas of the Solar PV Site. These measures are described in Chapter 2: The Scheme of the ES **[APP-054]**.

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		businesses and farms for the whole of the construction period which we have been told could be up to two years. Another major concern is about the prospect of noise and vibration for the construction period and thereafter from the panels themselves. We do not believe the assurances from the developer about potential noise have been adequate and have failed to satisfy the concerns of our residents. The panels are so close to many properties, so residents are bound to hear any noise or activity such as extra lorry movements and are also very worried about the construction methods such as piling which can cause a severe noise nuisance. There is also the prospect of serious damage done to older properties as they were built without foundations. Again, we do not feel that developers have sufficiently dealt with residents' concerns about this issue. Police forces around the UK have warned of the potential of increased criminality as OCGs see the potential in the copper and other metals in the panels. This could mean a change in the type of fencing proposed making it even more intrusive – coupled with the inevitable cameras and lighting it will be like living in the middle of a huge industrial power station. It could also cause issues with people getting insurance on their homes and possessions particularly those who live closest to the earmarked fields. There is basic street lighting in the village itself but no street lighting in the outer parts of the parish which is part of it's charm so the prospect of living amidst cameras and arc lighting on a daily basis is quite disturbing. 5.44 km of local footpaths will be severely compromised by this development and some are also part of the historic Howden20 route which is enjoyed by many people from all over the area and further afield. Spaldington has long been a major part of the route and the sight of groups of ramblers, cyclists and horse riders enjoying the beautiful countryside and abundant wildlife is part of everyday life for us. Once operational these fields may lead to an increase in surface water runoff leading potentially to flooding issues particularly with the threat of climate change (there are also studies that show large solar farms can create microclimates) bringing even more adverse weather conditions in the future. This year after the heaviest rain experienced for many years there is low level flooding throughout the designated site. Standing water on the fields has caused run off into gardens where it has never happened before. Compressing heavy clay soil and filling it with concrete will only make the situation far worse and the threat of flooding a real possibility in the years to come.	**Flood Risk and Drainage** A Flood Risk Assessment **[APP-096]**, **[APP-097]** has been produced for the Scheme and considers risk both to, and arising from, the Scheme. This includes both the Solar PV Site and for the Grid Connection Corridor. As part of the Flood Risk Assessment, mitigation is proposed to manage the potential impacts of flood risk so that the development does not increase or exacerbate flood risk to others. This mitigation has been informed by site-specific hydraulic modelling which takes into account climate change with respect to the lifetime of the development. A Framework Surface Water Drainage Strategy **[APP-098]** has also been produced for the Scheme which aims to manage surface water from the Scheme. This strategy incorporates Sustainable Drainage Systems (SuDS) to manage surface water from the Solar PV Site so that the Scheme remains safe throughout its lifetime and does not increase flood risk to others. **Traffic** A full and detailed assessment of potential traffic and transport impacts from construction at sensitive receptors has been undertaken within Chapter 13: Transport and Access of the ES **[APP-065]**. The conclusions (reference to Section 13.7) indicated that significant adverse effects would only be expected in one location (B1228 between B1230 and Brind Lane junctions). No significant adverse effects would be expected at any other locations. Any impacts (including at the B1228 between B1230 and Brind Lane junctions) would be temporary and would be managed through the embedded mitigation measures. In relation to the point regarding the usage of single track roads, access routes have been tracked using industry standard Autotrack software, as provided in Appendix 13-5: Framework CTMP, Annex A: Proposed Access Layouts, Visibility Splays and Swept Paths within the ES **[APP-114, APP-15, APP-116]**. This has been done to ensure that movements can be made suitably and safely. Where issues were identified, carriageway widening and/or vegetation removal and associated traffic management to facilitate safe implementation would be introduced. The Framework CTMP **[APP-238]** provides full details of embedded mitigation measures that are proposed to prevent or reduce potential adverse effects associated with traffic on roads in the Spaldington area. Any large vehicles required for the construction of the Scheme will use defined routes to arrive at the compound locations, as described within Section 4 of the Framework CTMP **[APP-238]**. Details of the expected traffic volumes and types of vehicles expected to be used are provided within Section 3 of the Framework CTMP **[APP-238]**. During the peak period of construction, the Scheme would generate 25 in and 25 out daily HGV movements and 50 in and 50 out daily Tractor-Trailer movements spread across the local road network. Assessment within Chapter 13: Transport and Access of the ES, Section 13.7 **[APP-065]** concludes that significant adverse effects would only be expected in one location (B1228 between B1230 and Brind Lane junctions). This effect is not related to the volume of HGV or Tractor-Trailer movements. No significant adverse effects would be expected at any other locations. Any impacts (including at the B1228 between B1230 and Brind Lane junctions) would be temporary and would be managed through the embedded mitigation measures.

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		In conclusion we strongly object to this application on the grounds that it will have a huge detrimental effect on the residential and visual amenity of Spaldington's residents and their quality of life for all of the above reasons. There will be solar fields actually covering 25.8% of the Parish of Spaldington and the actual area affected (i.e. within sight of) will be 52%. In addition, the entire development which is defined as 3000 acres in the application will actually encompass an area of over 10,000 acres due to its piecemeal design which is of great concern to Spaldington Parish Council because of the severe potential impact on our residents. We also are very concerned about the effects on the mental health of members of our community both currently and also in the years to come – many residents are already feeling very stressed and worried about the impact on their lives from this ill-thought out application. We urge those responsible for approving this project to consider its full environmental impact on our community before making their decision. We are calling on them not only as residents but as stewards of this land that we all hold dear. Should this development be approved we would urge you to consider applying conditions to protect our Parish, residents and the local environment we hold so special	The Framework CTMP **[APP-238]** has been developed to include appropriate access routes for construction vehicles which would seek to minimise the impacts and disturbance to local road users. The Traffic Regulation Measures Plans **[AS-005, AS-006, AS-007]** outline areas where the Applicant anticipates that banks person or traffic signal control may be required to ensure the safe access and egress of construction vehicles for the Solar PV Site and Grid Connection Corridor. As referenced in the Framework CTMP **[APP-238]** where necessary temporary traffic signals would be proposed to mitigate the impact of the laying of the cable along busier roads. Where roads are less busy, traffic management will be conducted by a banks person where necessary. Traffic signal control is anticipated to be implemented on a limited basis where works to facilitate the construction of the access would require a safe working space being provided to construction operatives. The access designs for the Solar PV Site and Grid Connection Corridor have been designed on the principle of ensuring the safe access and egress of construction vehicles from the local road network whilst seeking to minimise the overall environmental impact. Access locations have sought to utilise existing access points where possible or locations where junction visibility would limit hedgerow removal. For construction access points 8 and 9 located off Ings Lane, construction vehicle will access these locations via an internal haul road accessible from Compound A off Willitoft Road. Details of access routes for travel to and from Compound A are provided within Section 4.1 of the Framework CTMP **[APP-238].** Therefore, no construction vehicles will access these sites through the village of Spaldington, thereby minimising construction traffic interactions with local residents and other road users. Construction vehicles travelled on Ings Lane between Access 8 and 9 will be managed via banks person control in order to ensure construction vehicles minimise any interaction with road users or pedestrians utilising Ings Lane to the east of the village of Spaldington. For accesses 13 and 14 situated on Willitoft Road and Spaldington Lane, access to these sites will be via Compound B situated on the B1228, with construction vehicles then travelling on Spaldington Lane. Spaldington Lane has an established passing place arrangement which will afford road users and construction traffic with appropriate points to give way to minimise disruption on the local road network. The Applicant is currently engaging with ERYC to refine passing place proposals, any updates will be entered into the examination once the proposals are deemed acceptable to East Riding of Yorkshire. The Framework CEMP **[APP-238]** includes mitigation measures to avoid impacts on existing utility infrastructure above and below ground as a result of excavation and engineering operations, which include: - Locating the Scheme outside of utilities protected zones; - Identification of unknown utilities before excavation (for example by scanning using CAT and Genny);

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- Consultation and agreement of construction/demobilisation methods will be undertaken with utility asset owners prior to works commencing; and
- Infrastructure that crosses the Scheme will be mapped and avoided through the design

The Draft DCO **[AS-008]** includes protective provisions for the protection of utility assets. Pre and post construction road condition surveys will also be undertaken at identified locations in consultation with the Local Highway Authority.

Noise and Vibration

Noise and vibration during the construction phase and noise during the operational phase have been assessed in Chapter 11: Noise and Vibration of the ES **[APP-063]**. Three assessment locations were selected at Spaldington (R11, R12 and R52) as representative of properties that would be worst-affected (shown in Figure 11-1 of the ES **[APP-211]**). This allowed the worst-case noise and vibration effects to be identified at properties in Spaldington. The construction assessment includes noise from pilling during construction of PV modules, as detailed in Table 1 of Appendix 11-4: Construction and Operational Noise Assessment within the ES **[APP-106]**.

Table 11-12 of Chapter 11: Noise and Vibration within the ES **[APP-063]** identifies a worst-case highest construction noise level at Spaldington of 60 dB LAeq,T. This would be temporary when PV construction works are taking place in close proximity to Spaldington and not significant. Spaldington properties are not close enough to PV module locations that piling induced vibration would be perceptible. No construction or operational traffic would be routed through Spaldington.

During operation of the Scheme, the highest predicted noise level at Spaldington properties was 31 dB LAr,Tr. This includes a 3 dB penalty that accounts for acoustic features that may make noise more distinguishable. To put this level of noise into context, design guides for new residential properties require an internal noise level of 30 dB LAeq,8h for good sleeping conditions. As such, noise from the Scheme may be perceptible but would not be at a level to cause disturbance.

The Applicant has also committed to positioning noise emitting Field Stations 250 metres (m) or further from residential properties. The two Grid Connection Substations proposed as part of the Scheme are also greater than 250 m from residential properties. The Scheme is also not proposing any visible lighting from CCTV or artificial lighting for security purposes. These design principles are set out in the Outline Design Principles Statement **[APP-235]**. The detailed design for the Scheme, which will need to be approved post consent prior to construction by the relevant local authorities, must be in accordance with the design principles set out in the Outline Design Principles Statement **[APP-235]** and this is secured by a requirement in Schedule 2 to the Draft DCO **[AS-008]**.

Public Rights of Way

Chapter 12: Socio-economics and Land Use within the ES **[APP-064]** assesses effects of the Scheme on PRoWs. It does not find any evidence that footpaths will be severely compromised. During the construction phase and decommissioning phase, that effects on PRoWs will be negligible. During operation, a minor beneficial effect is expected.

During construction, no PRoW closures will be required. The PRoW will be buffered from the perimeter fencing, with fencing being installed a minimum distance of 20 m either side of the centre of the PRoW where solar infrastructure lies to both sides (creating a 40 m wide corridor between the fence lines), or 15 m if solar infrastructure is to one side only. There will be a further 5

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m from the perimeter fence to the Solar PV panels. Horizontal Directional Drilling (HDD) will be used where the Grid Connection Corridor crosses the Rivers Ouse and Derwent and so the footpaths at these locations will be unaffected. The other PRoWs crossed by the Grid Connection Corridor and all PRoW which are crossed by the Interconnecting Cable Corridor would only be impacted during the short-term trenching and restoration operations. These PRoWs would remain open (likely managed through traffic management measures) although routes may be slightly diverted temporarily for a short period, for example moving from one side of a road to the other.

During operation, no closures or diversions to PRoWs are expected. Permissive Paths to enhance the current PRoW network will be provided as part of the Scheme.

During decommissioning there should be no need for any closures of PRoW. In a worst-case scenario, PRoW crossing the Grid Connection or Interconnecting Cable Corridor may be disrupted by traffic management or temporary diversions, but these will be short-term in duration.
A Framework PRoW Plan **[APP-245]** submitted with the DCO Application, outlines how (PRoW will be managed during construction and operation of the Scheme. The measures contained within this document (Section 3.7) will help to ensure the operation of PRoW in the local area in terms of user safety and accessibility.

The Framework CEMP **[APP-238]**, the Framework OEMP **[APP-239],** and Framework Demolition Environmental Management Plan (DEMP) **[APP-239]** have been prepared which explain the proposed management of PRoW (including diversions) and any PRoW mitigation during the construction, operation and decommissioning of the Scheme, as well as the implementation of permissive routes. Detailed management plans will need to be approved post consent prior to construction by the relevant local authorities. These detailed management plans must substantially accord with the framework management plans and this is secured by a requirement in Schedule 2 to the Draft DCO **[AS-008]**.

Human health
The Applicant recognises that the potential for future environmental changes associated with the Scheme during construction, operation and decommissioning are currently a source of concern for local residents. To address this concern, the Applicant has undertaken a comprehensive and robust Environmental Impact Assessment so that any likely significant effects of the Scheme can be identified and mitigated. Chapter 14: Human Health within the ES **[APP-066]** assesses potential effects of the Scheme on health and wellbeing of local residents. The assessment takes a holistic approach to health and considers a wide range of health determinants which are relevant to quality of life and amenity. The assessment considers elements of the Scheme which could affect mental health (for example changes in landscape and visual amenity, noise, access to open space and employment) as well as physical health (for example associated with air pollution and access to healthcare facilities). No significant adverse effects are identified with regard to human health.

Cumulative effects
The assessment of cumulative impacts of the Scheme with other existing and proposed energy developments as well as other developments in the locality is set out in chapters 6 – 16 of the ES **[APP-058 to APP-061, AS-014, APP-064 to APP-067, and AS016]** and is summarised in Chapter 17: Cumulative Effects and Interactions of the ES **[APP-069].** No new likely significant adverse effects are anticipated to arise from the Scheme when considered alongside those effects

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			generated by nearby developments. The Scheme is anticipated to have a significant beneficial effect upon the functional improvement of soil resources that would follow with the conversion of arable land to grassland when considered with the other solar farm proposals in the area.
RR-148	Howden Town Council	We wish to register our interest due to the potential impact of the solar farm on the residents of Howden and surrounding environment.	This comment is noted. The Applicant has carried out a full environmental impact assessment which is presented in the ES **[APP-052 to APP-061, AS-014, APP-063 to APP-067, AS-016, and AS-018]** and its associated figures **[APP-133 to APP-299]** and appendices **[APP-071 to APP-132]**. The significant adverse effects of the Scheme identified by this assessment have been mitigated where practicable and there are limited residual significant adverse effects of the Scheme. Impacts on the local area and community have therefore been minimised as far as practicable.

2.4 Non-Statutory Organisations

Table 2-19. Applicant's Responses to Relevant Representations – Non-Statutory Organisations

Ref. No.	IP Name	Comments from Relevant Representations	Response to Relevant Representation
RR-370	UK Solar Alliance	UK Solar Alliance Relevant Representation for East Yorkshire Solar NSIP Project My name is Dr Catherine Judkins and I am sending this representation on behalf of the UK Solar Alliance (formerly Solar Campaign Alliance). The UK Solar Alliance (UKSA) is an alliance of over 114 individual community groups across the UK, who have significant concerns about large-scale ground-mounted solar farms on greenfield land in their areas. The groups within the UKSA represent both NSIP schemes and projects that are seeking planning approval through local planning authorities. The UKSA recognises the importance of renewable energy and the contribution that solar PV can make towards achieving our Net Zero targets. We aim to facilitate appropriate solar developments and support roof top and car park solar, solar infrastructure corridors, etc. We agree with the Government's hierarchy for ground-mounted solar schemes - that these should be directed to brownfield sites first, and unproductive land of low economic, ecological and landscape value when suitable brownfield sites cannot be found. The UKSA does not agree with inappropriate and unnecessary solar developments on valued greenfield and greenbelt land and is particularly concerned about the rapid cumulative loss of the UK's most productive farmland to solar developments and the impact this will have on food security, as well as the UK's future farming industry. Energy Minister Graham Stuart MP has confirmed that there are far more solar farm applications at present than the UK needs. Since we have an abundance of such schemes, we believe that the right choices need to be made and that only the highest quality applications, with the least land use conflicts and least impacts on communities, should progress. We do not consider that the East Yorkshire scheme meets these criteria. The UKSA wishes to register its objection to the East Yorkshire solar proposal for the following reasons: 1. The scheme does not comply with the NPPF which stipulates that valuable farmland should be avoided. The land at the proposed East Yorkshire site sustains a range of high yielding arable crops. 2. The UK is currently importing a large proportion of its food, and restricted supply and food rationing is becoming more prevalent across the UK. Food security must be considered when looking at planning proposals that include such large areas of highly productive farmland. 3. We do not believe that the impacts of the scheme can be considered "temporary." Indeed, the loss of agricultural land could	The Applicant welcomes UK Solar Alliance's recognition of the importance of renewable energy and the contribution that solar PV can make towards achieving net zero targets. The Government has identified through its energy policy, most recently in the Overarching National Policy Statement (NPS) for Energy EN-1 and National Policy Statement for Renewable Energy EN-3, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's Statement of Need **[APP-232]**, this includes low carbon energy generation using solar technology. Developing the Scheme at its proposed size will therefore be an important contribution to meeting this need. As discussed in the Statement of Need **[APP-232]** the Applicant recognises that decentralised energy generation on roof tops has an important role to play in decarbonisation, however on its own, smaller scale solar, including rooftop solar, is not likely to deliver a sufficient total capacity at the required pace and at an affordable cost to meet the Government's targets. The Applicant has set out its rationale for selecting the Solar PV Site in Chapter 3: Alternatives and Design Evolution within the ES **[APP-055]**. This explains the stages and the main considerations which have influenced the Applicant in how it has selected the land for the Scheme. For the Solar PV Site this has included seeking to avoid environmental and land use constraints including landscapes designated for their important value nationally and locally and greenbelt, and taking into consideration other criteria such as topography; field pattern and arrangement; land use conflict, as well as land availability. The Applicant acknowledges that agricultural land will be used for the Scheme. Agricultural land quality was a consideration of the Applicant's site selection process. In response to points 1 and 2, the Scheme is located mostly on lower quality agricultural land, with the majority of the Scheme being on land not classed as BMV. For the Solar PV Site, 92.8% of the land used is non BMV land. The Applicant's discussions with farmers who farm areas of the Solar PV Site have also identified that this land is difficult to farm due to climatic factors and that this land is not always farmed to produce food for human consumption instead animal feed and for biomass purposes. In accordance with NPS EN-1 paragraph 5.11.3 and NPS EN-3 paragraph 2.10.29 the Applicant considered the use of previously developed land and did not identify any available land within its area of search of an appropriate size to locate the Scheme. In accordance with NPS EN-1 paragraph 5.11.12 and NPS EN-3 paragraphs 2.10.29 to 2.10.34 the Applicant has taken a sequential approach to the use of agricultural land considering whether land of lower grade is available and suitable. Following the identification of an area of search derived from the point of connection at the National Grid Drax Substation the Applicant did not identify any alternative sites which would be of lower grade agricultural land (compared to the majority of the Order limits) that were available or considered suitable for the Scheme and its objectives.

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		be lost indefinitely should the scheme be granted, and then 're-energised' once its term has ended. 4. We have concerns about the site selection process and the significant impact that this scheme would have on the local landscape and on those who enjoy this landscape. This includes the inadequacy of the suggested mitigation measures. The close proximity to houses and settlements seems unnecessary, and the harm caused by this is therefore also unnecessary.	The vast majority of agricultural land within the Order limits would also be available for return to its existing agricultural use following decommissioning of the Scheme. Decommissioning of the Scheme after 40 years is required and secured via secured by a requirement in Schedule 2 of the Draft DCO **[AS-008]**). The Scheme is therefore a long term temporary use. Chapter 15: Soils and Agricultural Land within the ES **[APP-067]** concludes that a very small amount (0.41 ha) of BMV Subgrade 3a agricultural land for tree planting would be permanently removed from agricultural use but would provide a permanent ecological benefit. In relation to non-BMV land, 8.97 ha of Subgrade 3b agricultural land would be permanently removed from agricultural use as a result of tree and hedge planting, and further 2 ha would be permanently removed from agricultural use as a result of the potential retention of the Grid Connection Substations and associated accesses. In addition, the conversion of arable land to grassland during the 40 year operational period has the potential to accrue improvement to soil function over a large area.
RR-370	UK Solar Alliance	5. We also have questions about noise impacts and the affect of visual and noise impacts on people's mental health and well-being.	Noise and vibration during the construction phase and noise during the operational phase have been assessed in Chapter 11: Noise and Vibration, ES Volume 1 **[APP-063]**. This concludes that no significant noise or vibration effects are predicted during the construction and decommissioning phases or the operational phase with the exception of night-time HDD activities in the construction phase. However, identification of likely significant effects is precautionary based on the worst-case assumption that 24-hour HDD working would be required. The Applicant has also committed to positioning noise emitting Field Stations 250 metres (m) or further from residential properties. The two Grid Connection Substations proposed as part of the Scheme are also greater than 250 m from residential properties. The Scheme is also not proposing any visible lighting from CCTV or artificial lighting for security purposes. These design principles are set out in the Outline Design Principles Statement **[APP-235]**. The detailed design for the Scheme, which will need to be approved post consent prior to construction by the relevant local authorities, must be in accordance with the design principles set out in the Outline Design Principles Statement **[APP-235]** and this is secured by a requirement in Schedule 2 to the Draft DCO **[AS-008]**. The Applicant recognises that the potential for future environmental changes associated with the Scheme during construction, operation and decommissioning are currently a source of concern for local residents. To address this concern, the Applicant has undertaken a comprehensive and robust Environmental Impact Assessment so that any likely significant effects of the Scheme can be identified and mitigated. Chapter 14: Human Health, ES Volume 1 **[APP-066]** assesses potential effects of the Scheme on health and wellbeing of local residents. The assessment takes a holistic approach to health and considers a wide range of health determinants which are relevant to quality of life and amenity. The assessment considers elements of the Scheme which could affect mental health (for example changes in landscape and visual amenity, noise, access to open space and employment) as well as physical health (for example associated with air pollution and access to healthcare facilities). No significant adverse effects are identified with regards to human health.
RR-370	UK Solar Alliance	6. The UKSA has significant concerns about the biodiversity claims and assessments and the long-term impacts this may	Chapter 8: Ecology, ES Volume 1 **[APP-060]** presents the findings of an assessment of the likely significant effects of the Scheme on ecology. The chapter concludes that with the mitigation measures

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		have. We note the number of rare species within the scheme area.	set out in section 8.8. of this document, there are no residual significant adverse effects that have been identified during construction, operation or decommissioning of the Scheme.
RR-370	UK Solar Alliance	7. We also consider that traffic and transport impacts have not been adequately addressed.	A full and detailed assessment of potential traffic and transport impacts at sensitive receptors has been undertaken within Chapter 13: Transport and Access, ES Volume 1 **[APP-065].** The conclusions (refer to Section 13.7) indicated that significant adverse effects would only be expected in one location (B1228 between B1230 and Brind Lane junctions). No significant adverse effects would be expected at any other locations. Any impacts (including at the B1228 between B1230 and Brind Lane junctions) would be temporary and would be managed through the embedded mitigation measures. The Framework CTMP **[APP-238]** provides full details of embedded mitigation measures that are proposed to prevent or reduce potential adverse effects associated with traffic using roads within the vicinity of the Scheme.
RR-370	UK Solar Alliance	8. More generally we have concern about the adequacy of consultation, and the fact that a number of questions raised by residents during the statutory consultation remain unanswered by the developer. This is not the way to deliver renewable energy schemes with community support. Many thanks for your consideration.	The Applicant carried out three rounds of consultation during the pre-application period ahead of finalising its proposals for the Scheme. The Applicant complied with the requirements of the Planning Act 2008 as set out in the Consultation Report **[APP-025]** and the host and neighbouring local authorities for the Scheme submitted Adequacy of Consultation Responses to confirm this **[AoC-001 to AoC-012]**. The questions raised by respondents to the statutory consultation are set out in Appendix P of the Consultation Report. Appendix P5 **[APP-045]** sets out the Applicant's response to matters raised by the public.
RR-377	Yorkshire Wildlife Trust	Yorkshire Wildlife Trust may wish to comment on the proposals, particularly in relation to the proximity to statutory and non-statutory designated sites, such as SAC's SPA's, Ramsar (and any land functionally linked to these sites), SSSI's and Local Wildlife Sites. We may also comment on ground nesting birds and proposed mitigation, and habitat creation proposals, including the long term management of these habitats, including post decommissioning.	The Applicant notes this comment.
RR-088	East Riding of Yorkshire and Kingston upon Hull Joint Local Access Forum	Outline of comments that will be submitted by the East Riding of Yorkshire and Kingston upon Hull Joint Local Access Forum. • The East Riding of Yorkshire and Kingston upon Hull Joint Local Access Forum (JLAF) is a statutory advisory body that safeguards PRoW (PRoWs) and promotes their use for public access to the countryside, which can be beneficial for health. PRoWs are protected in law and are recorded on the Definitive Map held at East Riding of Yorkshire Council (ERYC). • The East Yorkshire Solar Farm and cable corridors impact 22 PRoWs. • The JLAF does not object to the proposed development, but raises the following points: 1. Specific details of PRoW diversions are essential. 2. Proposed temporary diversions must be discussed with ERYC's Countryside Access Team. 3. Temporary closure and diversion durations should be minimised (less than 3 months). 4. Applicant to give timetable for closures which should be on a rolling basis and not for the duration of the installations.	A Framework PRoW Management Plan **[APP-245]** submitted with the DCO Application, outlines how PRoW will be managed during construction, operation and decommissioning of the Scheme. It provides specific details of PRoW diversions. The measures contained within this document (Section 3.7) will also help to ensure the PRoW in the local area remain open and are appropriately managed in terms of user safety and accessibility. As set out in Chapter 13: Traffic and Transport, ES Volume 1 **[APP-065]** and the Framework PRoW Management Plan **[APP-245]** there will be no PRoW closures as a result of the Scheme and all PRoW receptors within the Order limits will be physically separated from construction works, including traffic route where practicable and relevant. A limited number of temporary diversions and crossing points are required for PRoW affected by the installation of solar PV infrastructure and cabling. HDD will be used where the Grid Connection Corridor crosses the Rivers Ouse and Derwent and so the footpaths at these locations will be unaffected. The other PRoWs crossed by the Grid Connection Corridor and all PRoW which are crossed by the Interconnecting Cable Corridor would only be impacted during the short-term trenching and restoration operations. These PRoWs would remain open and would be likely managed through traffic management measures although routes may be slightly diverted temporarily for a short period, for example moving from one side of a road to the other.

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		5. Applicant/subsequent owners of the cables should be required to adopt medium-term (7 years) responsibility (i.e. payment) for restoration of surface settlement where PRoWs cross ground that has been disturbed, as this will undoubtedly occur. 6. Applicant be required to identify how the project will enhance PRoWs in the project area in addition to the stated intention to provide new Permissive Paths in accordance with the National Planning Policy Framework (2021 Revision, para. 100). 7. Alternatively, Applicant be required to give an undertaking to provide a reasonable annual developer contribution (similar to a Section 106 agreement) to ERYC, this fund being used to deliver improvements to public rights of way and access in parishes affected by the PV arrays and crossed by the cable corridors. 8. The Secretary of State should consider whether the DCO application includes appropriate mitigation measures regarding its impact on PRoWs and countryside access (Overarching National Policy Statement for Energy EN-1; paras 5.11.30 and 5.11.31). 9. In the DCO, the distances between all PRoWs and security fencing that encloses solar panel arrays as described in the Applicant's ES, Vol. 1, Chapt. 12: Socio-economics and Landuse; Doc. Ref: EN010143/APP/6.1 must be specified. 10. Applicant's stated intention to provide new Permissive Paths must be specified and included as an element of the permission granted by the DCO. 11. The DCO should take account of the Secretary of State for the Environment's extension of the deadline to the year 2031 for submission of claims of historical rights of way that are not recorded on the Definitive Map.	During decommissioning there should be no need for any closures of PRoW. In a worst-case scenario, PRoW crossing the Grid Connection or Interconnecting Cable Corridor may be disrupted by traffic management or temporary diversions, but these will be short-term in duration. The Framework CEMP **[APP-238]**, the Framework OEMP **[APP-239],** and Framework DEMP **[APP-239]** have been prepared which also explain the proposed management of PRoW (including diversions) and any PRoW mitigation during the construction, operation and decommissioning of the Scheme, as well as the implementation of permissive routes. Detailed management plans will need to be approved post consent prior to construction by the relevant local authorities. These detailed management plans must substantially accord with the framework management plans discussed above and this is secured by a requirement in Schedule 2 to the Draft DCO **[AS-008]**. The Applicant discussed the Scheme's impact on PRoW and its proposed provision of permissive paths with the ERYC PRoW team in February 2023 and has continued to liaise with the Council's PRoW team up to submission of the Application. As detailed in the DAS **[APP-234]** one of the Scheme's design objectives is to enhance, where practicable, the existing network of PRoW to improve accessibility (objective 7) and another objective is to respond sensitively to its proximity to PRoW with regard to visual impact, noise and lighting (objective 4). This design approach is in accordance with 5.10.21 and 5.11.30 of NPS EN-1 and paragraphs 2.10.40 to 2.10.45 of NPS EN-3. The Applicant has sought to avoid land which is crossed by PRoW and where this has not been possible consideration has been given to including sufficient buffers to ensure they are maintained during the construction, operation and decommissioning as set out in the Framework PRoW Management Plan **[APP-245]**. Perimeter fencing is proposed to be installed a minimum distance of 20 m either side of the centre of the PRoW where solar infrastructure lies to both sides (creating a 40 m wide corridor between the fence lines), or 15 m if solar infrastructure is to one side only. There will be a further 5 m from the perimeter fence to the Solar PV panels. Improvements to the connectivity of the existing PRoW are proposed through the provision of permissive paths the design of which will accord with the ERYC's PRoW design standards. These routes will be available to the public during the operational life of the Scheme, as follows: a. A continuation of Bridleway SPALB08 which currently terminates at Johnsons Farm, where the Operations and Maintenance Hub will be situated. This will be a Permissive Path over which horse riders will be permitted to travel, running northbound for approximately 340 m until connecting with the second permissive route; and b. An eastbound route from footpath SPALF14 (north of Spaldington) parallel with Londesborough Drain to connect with the first Permissive Path, continuing eastwards to the edge of the Habitat Enhancement Area running for approximately 1.4 km. This Permissive Path will allow horse riding over

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			the majority of the extent of the route. The section travelling westbound from where the two permissive routes meet will permit passage by foot only, being of approximately 250 m in length. These are shown on the Landscape Masterplan provided at Appendix A of the Framework LEMP **[APP-246].** A detailed LEMP which will be substantially in accordance with the Framework LEMP will need to be agreed with the local authority and this is secured by requirement 6 of the Draft DCO **[AS-008].** Chapter 10: Landscape and Visual Amenity, ES Volume 1 **[AS-014]** assesses the visual impacts of the Scheme on PRoW and representative viewpoints are illustrated on Figure 10-7: Representative Viewpoint Locations Plan, ES Volume 3 **[APP-162].** The assessment concludes that, with the mitigation proposed as part of the Scheme's design, during operation (Year 1), Viewpoint 4: Featherbed Lane PRoW (EASTB17), Viewpoint 11: PRoW (SPALF14 and SPALF01) Spaldington, Viewpoint 14: A614, PRoW (EASTF15 and EASTF13) Caville Hall Farm, Burland, and users of the Howden 20 long distance route will experience significant adverse effects. By operation Year 15 these effects are reduced to minor adverse and therefore not significant as a result of the establishment of the proposed mitigation, enhancement and replacement planting and the management of existing hedgerow. Requirement 18 of the Draft DCO **[AS-008]** limits the operational period of the Scheme to 40 years and therefore the effects on PRoW are reversible. Chapter 12: Socio-economics and Land Use, ES Volume 1 **[APP-064]** also assesses the effects of the Scheme on PRoWs. It does not find any evidence that PRoWs will be severely compromised. During the construction phase and decommissioning phase, effects on PRoWs will be negligible. During operation, a minor beneficial effect is expected due to the provision of permissive paths. Chapter 13: Transport and Access, ES Volume 1 **[APP-065]** also assesses the Schemes impact on PRoW in relation to transport and access. It concludes that during construction, operation and decommissioning of the Scheme, there would be no significant adverse effects on pedestrians, equestrians or cyclists in terms of severance, delay, amenity, fear and intimidation, or accidents and safety, in relation to access, and there would be no significant effects on PRoW with regard to total traffic and HGV increase. A Framework CTMP **[APP-238]** is submitted with the application which sets out the mitigation measures to minimise traffic impacts. This will inform a detailed CTMP and is secured by requirement 13 of the Draft DCO **[AS-008].**
RR-310	Ramblers Association- East Yorkshire & Derwent Branch	I am area secretary of the local Ramblers Association, and I live in Howden and regularly lead walks for the Ramblers around the Howden area. I am very concerned about the vast size of this proposed solar panel farm, it will result in the industrialisation of 3000 acres the lovely countryside, at numerous local sites where we love to walk.	The Government has identified through its energy policy, most recently in the Overarching National Policy Statement for Energy EN-1 and National Policy Statement for Renewable Energy EN-3, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's Statement of Need **[APP-232]**, this includes low carbon energy generation using solar technology. Developing the Scheme at its proposed size will therefore be an important contribution to meeting this need. The Scheme design is the result of an iterative design process which delivers the Scheme's functionality, the generation of a large amount of renewable electricity using single axis tracker solar technology, whilst addressing the local context and setting within which it is located. The Applicant's design team has worked collaboratively to provide an integrated and responsive design which has been informed by the process of environmental impact assessment, statutory consultation and stakeholder engagement.

Ref. No.	IP Name	Comments from Relevant Representations	Response to Relevant Representation
			As set out in the DAS **[APP-234]** design objectives have guided the design response from an early stage to develop a good design that balances the need to maximise renewable energy generation from the Scheme, whilst minimising potential adverse impacts and providing mitigation and enhancement measures where practicable. This has resulted in a Scheme which, with the implementation of mitigation, avoids residual significant adverse effects in relation to designated landscapes; biodiversity sites; protected species or habitats; agricultural land; heritage assets; flood risk; water quality; access; and land uses within the local area. Impacts on the local area have therefore been minimised as far as practicable. The Applicant acknowledges that the operation of the Scheme will result in residual significant adverse effects upon the local landscape character and a small number of visual receptors, as presented in the Chapter 10: Landscape and Visual Amenity Assessment, ES Volume 1 **[AS-014]**. One of the Scheme's design objectives is to ensure the design responds sensitively to residential properties in proximity to the Scheme regarding visual impact, noise and lighting. This design approach is in accordance with paragraph 5.10.22 of NPS EN-1 and paragraph 2.10.131 to 2.10.133 of NPS EN-3. To achieve this, the Scheme design therefore retains existing vegetation as far as practicable and proposes carefully designed planting to provide screening. The design also incorporates buffers from residential properties to the solar PV infrastructure. Details of the proposed screening and buffers including existing vegetation to be retained and proposed planting are provided in the Framework LEMP **[APP-246]** and illustrated on the Framework Landscape Masterplan included as Appendix A of the Framework LEMP **[APP-246]** and Section 5.4 of the DAS **[APP-234]**. Existing hedgerows will be retained as far as practicable. Buffers of grassland, native scrub, woodland and traditional orchard will be created around the edge of the Solar PV Areas and other larger areas of grassland will be created, which will offer habitat for wildlife. A Framework PRoW Management Plan **[APP-245]** submitted with the DCO Application, outlines how PRoW will be managed during construction, operation and decommissioning of the Scheme. It provides specific details of PRoW diversions. The measures contained within this document (Section 3.7) will also help to ensure the PRoW in the local area remain open and are appropriately managed in terms of user safety and accessibility. As set out in Chapter 13: Traffic and Transport, ES Volume 1 **[APP-065]** and the Framework PRoW Management Plan **[APP-245]** there will be no PRoW closures as a result of the Scheme and all PRoW receptors within the Order limits will be physically separated from construction works, including traffic route where practicable and relevant. A limited number of temporary diversions and crossing points are required for PRoW affected by the installation of solar PV infrastructure and cabling. HDD will be used where the Grid Connection Corridor crosses the Rivers Ouse and Derwent and so the footpaths at these locations will be unaffected. The other PRoWs crossed by the Grid Connection Corridor and all PRoW which are crossed by the Interconnecting Cable Corridor would only be impacted during the short-term trenching and restoration operations. These PRoWs would remain open and would be likely managed through traffic management measures although routes may be slightly diverted temporarily for a short period, for example moving from one side of a road to the other.

Ref. No.	IP Name	Comments from Relevant Representations	Response to Relevant Representation
			During decommissioning there should be no need for any closures of PRoW. In a worst-case scenario, PRoW crossing the Grid Connection or Interconnecting Cable Corridor may be disrupted by traffic management or temporary diversions, but these will be short-term in duration. The Framework CEMP **[APP-238]**, the Framework OEMP **[APP-239],** and Framework DEMP **[APP-239]** have been prepared which also explain the proposed management of PRoW (including diversions) and any PRoW mitigation during the construction, operation and decommissioning of the Scheme, as well as the implementation of permissive routes. Detailed management plans will need to be approved post consent prior to construction by the relevant local authorities. These detailed management plans must substantially accord with the framework management plans discussed above and this is secured by a requirement in Schedule 2 to the Draft DCO **[AS-008]**. The Applicant has sought to avoid land which is crossed by PRoW and where this has not been possible consideration has been given to including sufficient buffers to ensure they are maintained during the construction, operation and decommissioning as set out in the Framework PRoW Management Plan **[APP-245]**. Perimeter fencing is proposed to be installed a minimum distance of 20 m either side of the centre of the PRoW where solar infrastructure lies to both sides (creating a 40 m wide corridor between the fence lines), or 15 m if solar infrastructure is to one side only. There will be a further 5 m from the perimeter fence to the Solar PV panels. Improvements to the connectivity of the existing PRoW are proposed through the provision of permissive paths the design of which will accord with the ERYC's PRoW design standards. These routes will be available to the public during the operational life of the Scheme, as follows: a. A continuation of Bridleway SPALB08 which currently terminates at Johnsons Farm, where the Operations and Maintenance Hub will be situated. This will be a Permissive Path over which horse riders will be permitted to travel, running northbound for approximately 340 m until connecting with the second permissive route; and b. An eastbound route from footpath SPALF14 (north of Spaldington) parallel with Londesborough Drain to connect with the first Permissive Path, continuing eastwards to the edge of the Habitat Enhancement Area running for approximately 1.4 km. This Permissive Path will allow horse riding over the majority of the extent of the route. The section travelling westbound from where the two permissive routes meet will permit passage by foot only, being of approximately 250 m in length. These are shown on the Landscape Masterplan provided at Appendix A of the Framework LEMP **[APP-246].** A detailed LEMP which will be substantially in accordance with the Framework LEMP will need to be agreed with the local authority and this is secured by requirement 6 of the Draft DCO **[AS-008].** Chapter 10: Landscape and Visual Amenity, ES Volume 1 **[AS-014]** assesses the visual impacts of the Scheme on PRoW and representative viewpoints are illustrated on Figure 10-7: Representative Viewpoint Locations Plan, ES Volume 3 **[APP-162].** The assessment concludes that, with the mitigation proposed as part of the Scheme's design, during operation (Year 1), Viewpoint 4: Featherbed Lane PRoW (EASTB17), Viewpoint 11: PRoW (SPALF14 and SPALF01) Spaldington,

Ref. No.	IP Name	Comments from Relevant Representations	Response to Relevant Representation
			Viewpoint 14: A614, PRoW (EASTF15 and EASTF13) Caville Hall Farm, Burland, and users of the Howden 20 long distance route will experience significant adverse effects. By operation Year 15 these effects are reduced to minor adverse and therefore not significant as a result of the establishment of the proposed mitigation, enhancement and replacement planting and the management of existing hedgerow. Requirement 18 of the Draft DCO **[AS-008]** limits the operational period of the Scheme to 40 years and therefore the effects on PRoW are reversible. Chapter 12: Socio-economics and Land Use, ES Volume 1 **[APP-064]** also assesses the effects of the Scheme on PRoWs. It does not find any evidence that PRoWs will be severely compromised. During the construction phase and decommissioning phase, effects on PRoWs will be negligible. During operation, a minor beneficial effect is expected due to the provision of permissive paths. Chapter 13: Transport and Access, ES Volume 1 **[APP-065]** also assesses the Schemes impact on PRoW in relation to transport and access. It concludes that during construction, operation and decommissioning of the Scheme, there would be no significant adverse effects on pedestrians, equestrians or cyclists in terms of severance, delay, amenity, fear and intimidation, or accidents and safety, in relation to access, and there would be no significant effects on PRoW with regard to total traffic and HGV increase. A Framework CTMP **[APP-238]** is submitted with the application which sets out the mitigation measures to minimise traffic impacts. This will inform a detailed CTMP and is secured by requirement 13 of the Draft DCO **[AS-008].**
RR-310	Ramblers Association- East Yorkshire & Derwent Branch	There are a number of public footpaths around these villages and also the "Howden 20" a 20 mile circular network of paths starting from Howden which is well known and attracts walkers from outside our area. The installation of huge rows of tall solar panels would ruin the beauty of these lovely footpaths for walkers, with large areas of fields of metal and glass, battery storage and high heavy duty security fencing.	A Framework PRoW Management Plan **[APP-245]** submitted with the DCO Application, outlines how PRoW will be managed during construction, operation and decommissioning of the Scheme. It provides specific details of PRoW diversions. The measures contained within this document (Section 3.7) will also help to ensure the PRoW in the local area remain open and are appropriately managed in terms of user safety and accessibility. As set out in Chapter 13: Traffic and Transport, ES Volume 1 **[APP-065]** and the Framework PRoW Management Plan **[APP-245]** there will be no PRoW closures as a result of the Scheme and all PRoW receptors within the Order limits will be physically separated from construction works, including traffic route where practicable and relevant. A limited number of temporary diversions and crossing points are required for PRoW affected by the installation of solar PV infrastructure and cabling. HDD will be used where the Grid Connection Corridor crosses the Rivers Ouse and Derwent and so the footpaths at these locations will be unaffected. The other PRoWs crossed by the Grid Connection Corridor and all PRoW which are crossed by the Interconnecting Cable Corridor would only be impacted during the short-term trenching and restoration operations. These PRoWs would remain open and would be likely managed through traffic management measures although routes may be slightly diverted temporarily for a short period, for example moving from one side of a road to the other. During decommissioning there should be no need for any closures of PRoW. In a worst-case scenario, PRoW crossing the Grid Connection or Interconnecting Cable Corridor may be disrupted by traffic management or temporary diversions, but these will be short-term in duration. The Framework CEMP **[APP-238]**, the Framework OEMP **[APP-239],** and Framework DEMP **[APP-239]** have been prepared which also explain the proposed management of PRoW (including

Ref. No.	IP Name	Comments from Relevant Representations	Response to Relevant Representation
			diversions) and any PRoW mitigation during the construction, operation and decommissioning of the Scheme, as well as the implementation of permissive routes. Detailed management plans will need to be approved post consent prior to construction by the relevant local authorities. These detailed management plans must substantially accord with the framework management plans discussed above and this is secured by a requirement in Schedule 2 to the Draft DCO **[AS-008]**. The Applicant has sought to avoid land which is crossed by PRoW and where this has not been possible consideration has been given to including sufficient buffers to ensure they are maintained during the construction, operation and decommissioning as set out in the Framework PRoW Management Plan **[APP-245]**. Perimeter fencing is proposed to be installed a minimum distance of 20 m either side of the centre of the PRoW where solar infrastructure lies to both sides (creating a 40 m wide corridor between the fence lines), or 15 m if solar infrastructure is to one side only. There will be a further 5 m from the perimeter fence to the Solar PV panels. Improvements to the connectivity of the existing PRoW are proposed through the provision of permissive paths the design of which will accord with the ERYC's PRoW design standards. These routes will be available to the public during the operational life of the Scheme, as follows: a. A continuation of Bridleway SPALB08 which currently terminates at Johnsons Farm, where the Operations and Maintenance Hub will be situated. This will be a Permissive Path over which horse riders will be permitted to travel, running northbound for approximately 340 m until connecting with the second permissive route; and b. An eastbound route from footpath SPALF14 (north of Spaldington) parallel with Londesborough Drain to connect with the first Permissive Path, continuing eastwards to the edge of the Habitat Enhancement Area running for approximately 1.4 km. This Permissive Path will allow horse riding over the majority of the extent of the route. The section travelling westbound from where the two permissive routes meet will permit passage by foot only, being of approximately 250 m in length. These are shown on the Landscape Masterplan provided at Appendix A of the Framework LEMP **[APP-246].** A detailed LEMP which will be substantially in accordance with the Framework LEMP will need to be agreed with the local authority and this is secured by requirement 6 of the Draft DCO **[AS-008].** Chapter 10: Landscape and Visual Amenity, ES Volume 1 **[AS-014]** assesses the visual impacts of the Scheme on PRoW and representative viewpoints are illustrated on Figure 10-7: Representative Viewpoint Locations Plan, ES Volume 3 **[APP-162].** The assessment concludes that, with the mitigation proposed as part of the Scheme's design, during operation (Year 1), Viewpoint 4: Featherbed Lane PRoW (EASTB17), Viewpoint 11: PRoW (SPALF14 and SPALF01) Spaldington, Viewpoint 14: A614, PRoW (EASTF15 and EASTF13) Caville Hall Farm, Burland, and users of the Howden 20 long distance route will experience significant adverse effects. By operation Year 15 these effects are reduced to minor adverse and therefore not significant as a result of the establishment of the proposed mitigation, enhancement and replacement planting and the management of existing hedgerow. Requirement 18 of the Draft DCO **[AS-008]** limits the operational period of the Scheme to 40 years and therefore the effects on PRoW are reversible.

Ref. No.	IP Name	Comments from Relevant Representations	Response to Relevant Representation
			Chapter 12: Socio-economics and Land Use, ES Volume 1 **[APP-064]** also assesses the effects of the Scheme on PRoWs. It does not find any evidence that PRoWs will be severely compromised. During the construction phase and decommissioning phase, effects on PRoWs will be negligible. During operation, a minor beneficial effect is expected due to the provision of permissive paths. Chapter 13: Transport and Access, ES Volume 1 **[APP-065]** also assesses the Schemes impact on PRoW in relation to transport and access. It concludes that during construction, operation and decommissioning of the Scheme, there would be no significant adverse effects on pedestrians, equestrians or cyclists in terms of severance, delay, amenity, fear and intimidation, or accidents and safety, in relation to access, and there would be no significant effects on PRoW with regard to total traffic and HGV increase. A Framework CTMP **[APP-238]** is submitted with the application which sets out the mitigation measures to minimise traffic impacts. This will inform a detailed CTMP and is secured by requirement 13 of the Draft DCO **[AS-008].** The Applicant recognises that the potential for future environmental changes associated with the Scheme during construction, operation and decommissioning are currently a source of concern for local residents. To address this concern, the Applicant has undertaken a comprehensive and robust EIA so that any likely significant effects of the Scheme can be identified and mitigated. Chapter 14: Human Health within the ES **[APP-066]** assesses potential effects of the Scheme on health and wellbeing of local residents. The assessment takes a holistic approach to health and considers a wide range of health determinants which are relevant to quality of life and amenity. The assessment considers elements of the Scheme which could affect mental health (for example changes in landscape and visual amenity, noise, access to open space and employment) as well as physical health (for example associated with air pollution and access to healthcare facilities). No significant adverse effects are identified with regard to human health.
RR-310	Ramblers Association- East Yorkshire & Derwent Branch	We are not against solar panels, I have them on the roof of my house, but they should be installed on building roofs and brown field sites and not on agricultural land.	The Government has identified through its energy policy, most recently in the Overarching National Policy Statement for Energy EN-1 and National Policy Statement for Renewable Energy EN-3, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's Statement of Need **[APP-232]**, this includes low carbon energy generation using solar technology. Developing the Scheme at its proposed size will therefore be an important contribution to meeting this need. As discussed in the Statement of Need **[APP-232]** the Applicant recognises that decentralised energy generation on roof tops has an important role to play in decarbonisation, however on its own, smaller scale solar, including rooftop solar, is not likely to deliver a sufficient total capacity at the required pace and at an affordable cost to meet the Government's targets.

2.5 Persons with Interest in the Land

Table 2-20. Applicant's Responses to Relevant Representations – Persons with Interest in the Land

Ref. No.	IP Name	Land Interest	Comments from Relevant Representations	Response to Relevant Representation
RR-133	Graham Falkingham	Category 1 & 2 (Freehold ownership, occupation, subsoil interest & multiple rights)	In favour with some sensible screening it is well situated and a large area is not visible from many dwellings. This development is definitely needed to help stop climate change and help the governments net zero commitments. All lot of the wheat gown in this area is destined to go to the two local biofuel plants in SELBY and HULL. Solar power will be far greener than growing wheat to be made into fuel.	This comment is welcomed. The Government has identified through its energy policy, most recently in the Overarching National Policy Statement for Energy EN-1 and National Policy Statement for Renewable Energy EN-3, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's Statement of Need **[APP-232],** this includes low carbon energy generation using solar technology. Details of the proposed screening and buffers including existing vegetation to be retained and proposed planting are provided in the Framework Landscape and Ecological Management Plan **[APP-246]** and illustrated on the Framework Landscape Masterplan included as Appendix A of the Framework Landscape and Ecological Management Plan **[APP-246]** and Section 5.4 of the DAS **[APP-234].** Existing hedgerows will be retained as far as practicable. Buffers of grassland, native scrub, woodland and traditional orchard will be created around the edge of the Solar PV Areas and other larger areas of grassland will be created, which will offer habitat for wildlife.
RR-229	Matthew Axup	Category 1 (Freehold ownership, occupation & subsoil interest)	Hi, On the current plans my land has been selected for a cable corridor route. I would like to launch a complaint against Boom Power and their contractors/ agents due to the following: As we are part of the cable route they have had to carry out non intrusive surveys - We know that these surveys have been done without our permission and just let them selves onto our land like they own it. On top of this we know all the other farmers have received payment and did get notified about the surveys. We are still waiting for any communication regarding this. I asked my land agent to get in touch with them around some basic terms they posted to us with some comments on their proposal and again they never got back they just sent out some more terms with more changes to the amount of space they are looking to take and didn't take any of our comments into consideration. I attended a couple of their public events and when speaking to them I asked has all the land been sorted and finalised with the cable corridor as well - "they have agreed with all parties which the scheme will affect" I can confirm to this date (22/2/24) im still waiting for the agreement for the non intrusive survey or any heads of terms for the use of our land. I also asked as the scheme is so large I asked what they would do for the community and none of the boom power representatives had any idea, which I thought for this size of scheme is appalling. It just looks like they want to do what they want with no consideration to anyone in the local area. Along with a pure lack of respect for land owners. It seems	The Applicant carried out three rounds of consultation with the local community during the pre-application period to take into account feedback to help refine the Scheme proposals. Through this process, the Applicant carried out diligent inquiry in order to identify all persons who, by virtue of the nature of the interest they have in land, and the location of that land in relation to the Applicant's Order Limits, fall within the categories set out in Section 44 of the Planning Act 2008 for the Scheme. Land referencing has been undertaken throughout the pre-application period to ensure that any changes in ownership or new interests have been identified, consulted and subject to engagement. It was supplemented by ongoing one-to-one engagement with the affected land interests by the Applicant's appointed land agent. The Applicant is continuing negotiations with this Landowner.

Ref. No.	IP Name	Land Interest	Comments from Relevant Representations	Response to Relevant Representation
			just a big company trying to push over small land owners and village communities around. I would like to add I dont disagree with the solar however it is too large for the area half the size would be better and not to take the cable corridor all the way to Drax there must be a point closer they can use. The main complaint is just their mentality and dealing with the site and no care for local people. They have just lied to say its sorted but I can tell you one the ground its isn't sorted.	
RR-059	Colin Wilburn	Category 1 (Freehold ownership and occupation)	I have lived and worked on the land in this area all my life. As now a [REDACTED] year old, with children and grandchildren, I have seen this area change alot. When I was a child I lived with my family at Spaldington, and remember my dad taking water across to the people living on the airfield when it froze in 47. Farming has always been a tough job with little reward. This land is low quality and is struggling to leave a profit. As the government seem to want to import low quality, cheap food from who knows where, why not produce renewable energy. As ever with these projects, objectors insist the countryside will be concreted over. No such thing. The fields will be a haven for wildlife from bat's, birds, brown hares, hedgehogs, newts, toads and wild flowers boosting insects. The footpaths will be amazing to walk down. I can only hope I'm here to see it happen. Thank you.	The Applicant welcomes this comment. As acknowledged, the Scheme, with the implementation of mitigation, avoids residual significant adverse effects in relation to biodiversity sites and protected species or habitats. Biodiversity enhancements, as well as Permissive Paths to enhance the current PRoW network will be provided as part of the Scheme. The Scheme also avoids residual significant adverse effects in relation to designated landscapes; agricultural land; heritage assets; flood risk; water quality; access; and land uses within the local area. Impacts on the local area and community have therefore been minimised as far as practicable.
RR-322	Robin Wilburn	Category 1 (Freehold ownership and occupation)	Generating electricity on poorer quality land will good for the local economy. Local land owners all live and work in the area. Wildlife will be boosted by non application of pesticides and chemical fertilisers. Public footpaths will be widened and become an amazing place to see wildlife.	The Applicant welcomes this comment.
RR-320	Robert Falkingham	Category 1 (Freehold ownership & occupation)	The UK needs more green energy if we are to have any chance of reducing CO2 emissions. This scheme is on poor farmland in a very flat area, so is easily screened. A 2m high hedge adjacent to a road will	The Applicant welcomes this comment.

Ref. No.	IP Name	Land Interest	Comments from Relevant Representations	Response to Relevant Representation
			screen to the horizon. The project is well laid out in several locations, many of which are completely secluded from public view.	
RR-090	EBS Renewables Ltd (EBS Renewables Ltd)	Category 1 & 2 (in respect of apparatus)	It is the scale of the project that is the most concern. I register interest to enable me to be kept informed about the project as it goes through the process. I understand that EBS Renewables Ltd may be impacted by enforced rights of way or compulsory purchase.	The Government has identified through its energy policy, most recently in the Overarching National Policy Statement for Energy EN-1 and National Policy Statement for Renewable Energy EN-3, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's Statement of Need **[APP-232],** this includes low carbon energy generation using solar technology. Developing the Scheme at its proposed size will therefore be an important contribution to meeting this need. The Applicant notes that EBS Renewables Ltd has rights in plot 6/29 in respect of apparatus. Part 1 of Schedule 14 of the draft DCO provides protection for existing apparatus of statutory undertakers, and specifically paragraph 5 of Part 1 states that the undertaker must not acquire any apparatus other than by agreement. As such, the apparatus of EBS Renewables is protected through the draft DCO.
RR-087	E. Blenkhorn & Son (E. Blenkhorn & Son)	Paul Dirk Blenkhorn – Category 1 & 2 (Subsoil interest, occupation, rights access & rights for maintenance, access and restrictive covenants)	I am concerned about the scale of the project and its impact on the area. We have been informed that the farm may be impacted by either a compulsory purchase or enforced right of way on part of the farm.	The Government has identified through its energy policy, most recently in the Overarching National Policy Statement for Energy EN-1 and National Policy Statement for Renewable Energy EN-3, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's Statement of Need **[APP-232]**, this includes low carbon energy generation using solar technology. Developing the Scheme at its proposed size will therefore be an important contribution to meeting this need. The Scheme design is the result of an iterative design process which delivers the Scheme's functionality, the generation of a large amount of renewable electricity using single axis tracker solar technology, whilst addressing the local context and setting within which it is located. The Applicant's design team has worked collaboratively to provide an integrated and responsive design which has been informed by the process of environmental impact assessment, statutory consultation and stakeholder engagement. As set out in the Design and Access Statement **[APP-234]** design objectives have guided the design response from an early stage to develop a good design that balances the need to maximise renewable energy generation from the Scheme, whilst minimising potential adverse impacts and providing mitigation and enhancement measures where practicable. This has resulted in a Scheme which, with the implementation of mitigation, avoids residual significant adverse effects in relation to designated landscapes; biodiversity sites; protected species or habitats; agricultural land; heritage assets; flood risk; water quality; access; and land uses within the Howden area. Impacts on the local area have therefore been minimised as far as practicable. The Applicant carried out three rounds of consultation with the local community during the pre-application period to take into account feedback to help refine the Scheme proposals. Through this process, the Applicant carried out diligent inquiry in order to identify all persons who, by virtue of the nature of the interest they have in land, and the location of that land in

Ref. No.	IP Name	Land Interest	Comments from Relevant Representations	Response to Relevant Representation
				relation to the Applicant's Order Limits, fall within the categories set out in Section 44 of the Planning Act 2008 for the Scheme. Land referencing has been undertaken throughout the pre-application period to ensure that any changes in ownership or new interests have been identified, consulted and subject to engagement. It was supplemented by ongoing one-to-one engagement with the affected land interests by the Applicant's appointed land agent.
RR-061	D B Hunt & Co (D B Hunt & Co) on behalf of D B Hunt & Co (D B Hunt & Co)	Donald Beaumont Hunt – Category 1 (Subsoil interest, occupation & rights of way)	I am small farm on the perprosed route of the cable to Drax On the 5/4/22 we were approached by boom power to put a cable around the edge of 3 fields we signed a 1 year agreement so that a servey could be done A year later when boom power came back with a new agreement the cable route had moved much further into the fields and this would cut through about 30 land drains When we tried to negotiate with boom on how these drains would be rendstated boom power attitude seems to be take or leave it I now feel that that if they get planing permission they will come Back with a compulsory order So far we have not signed another agreement	The Applicant carried out three rounds of consultation with the local community during the pre-application period to take into account feedback to help refine the Scheme proposals. Through this process, the Applicant carried out diligent inquiry in order to identify all persons who, by virtue of the nature of the interest they have in land, and the location of that land in relation to the Applicant's Order Limits, fall within the categories set out in Section 44 of the Planning Act 2008 for the Scheme. Land referencing has been undertaken throughout the pre-application period to ensure that any changes in ownership or new interests have been identified, consulted and subject to engagement. It was supplemented by ongoing one-to-one engagement with the affected land interests by the Applicant's appointed land agent. The Applicant is continuing negotiations with this Landowner.
RR-162	Janice Beaumont-Hayes	Category 2 (Restrictive Covenants on title NYK411968)	Taking Farming land out of arable crop production which is more valuable for providing food to feed the human population of the country The local roads of the project can not cope with all the extra traffic A lot of the year not enough sun to produce solar power The impact on all wildlife habitation removal hedges, trees,dykes A major major impact on all the local residents and further a field I am having my say that I don't want the East Yorkshire Solar Farm and have many objections to why it should not go ahead. ,	The Government has identified through its energy policy, most recently in the Overarching National Policy Statement for Energy EN-1 and National Policy Statement for Renewable Energy EN-3, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's Statement of Need **[APP-232],** this includes low carbon energy generation using solar technology. Developing the Scheme at its proposed size will therefore be an important contribution to meeting this need. The Applicant acknowledges that agricultural land will be used for the Scheme however respectfully disagrees that this is valuable for agricultural production and will never recover. Agricultural land quality was a consideration of the Applicant's site selection process as described in Chapter 3: Alternatives and Design Evolution within the Environmental Statement **[APP-055].** The Scheme is located mostly on lower quality agricultural land, with the majority of the Scheme being on land not classed as Best and Most Versatile (BMV). For the Solar PV Site, 92.8% of the land used is non BMV land. The Applicant's discussions with farmers who farm areas of the Solar PV Site have also identified that this land is difficult to farm due to climatic factors and that this land is not always farmed to produce food for human consumption instead animal feed and for biomass purposes. The vast majority of agricultural land within the Order limits would be available for return to its existing agricultural use following decommissioning of the Scheme. Chapter 15: Soils and Agricultural Land within the Environmental Statement **[APP-067]** concludes that a very small amount (0.41 ha) of BMV Subgrade 3a agricultural land for tree planting would be permanently

Ref. No.	IP Name	Land Interest	Comments from Relevant Representations	Response to Relevant Representation

removed from agricultural use but would provide a permanent ecological benefit. In relation to non-BMV land, 8.97 ha of Subgrade 3b agricultural land would be permanently removed from agricultural use as a result of tree and hedge planting, and further 2 ha of Subgrade 3b agricultural land would be permanently removed as a result of the potential retention of the Grid Connection Substations and associated accesses. In addition, the conversion of arable land to grassland during the 40 year operational period has the potential to accrue improvement to soil function over a large area.

A full and detailed assessment of potential traffic and transport impacts from construction at sensitive receptors has been undertaken within Chapter 13: Transport and Access of the Environmental Statement **[APP-065].** The conclusions (reference to Section 13.7) indicated that significant adverse effects would only be expected in one location (B1228 between B1230 and Brind Lane junctions). No significant adverse effects would be expected at any other locations. Any impacts (including at the B1228 between B1230 and Brind Lane junctions) would be temporary and would be managed through the embedded mitigation measures.

Construction vehicle movements will be managed through the Framework Construction Traffic Management Plan **[APP-113].** The document will focus on the management of construction traffic along the local highway network within the vicinity of the Site during the construction period of the works, in order to limit any potential disruptions and implications on the wider transport network as well as for the existing road users. The Framework Construction Traffic Management Plan **[APP-133]** will inform a detailed Construction Traffic Management Plan that will be secured by a requirement in Schedule 2 of the draft DCO **[AS-008].**

The Scheme design is the result of an iterative design process which delivers the Scheme's functionality, the generation of a large amount of renewable electricity using single axis tracker solar technology, whilst addressing the local context and setting within which it is located.

The Applicant's design team has worked collaboratively to provide an integrated and responsive design which has been informed by the process of environmental impact assessment, statutory consultation and stakeholder engagement.

As set out in the Design and Access Statement **[APP-234]** design objectives have guided the design response from an early stage to develop a good design that balances the need to maximise renewable energy generation from the Scheme, whilst minimising potential adverse impacts and providing mitigation and enhancement measures where practicable.

This has resulted in a Scheme which, with the implementation of mitigation, avoids residual significant adverse effects in relation to designated landscapes; biodiversity sites; protected species or habitats; agricultural land; heritage assets; flood risk; water quality; access; and land uses within the local area. Impacts on the local area and community have therefore been minimised as far as practicable.

As set out in Chapter 8: Ecology, ES Volume 1 **[APP-060]** the Scheme avoids and mitigates significant adverse effects on internationally, nationally and locally designated sites and other important ecological features such as protected species and habitats. This has been achieved through careful design informed by a design team with qualified ecologists and embedding

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				appropriate mitigation measures during construction, operation and decommissioning phases, including appropriate buffers. In addition to protecting existing features of biodiversity value, the Applicant has also taken opportunities to maximise the enhancement of the biodiversity value of the Solar PV Site and other parts of the Scheme where relevant, including within field margins, undeveloped areas set aside for biodiversity enhancement, and in the land between and below solar PV infrastructure. This is explained in Section 5 of the Planning Statement **[APP-233]** and in the Framework LEMP **[APP-246]** and Design and Access Statement **[APP-234]** and illustrated on the landscape masterplan provided in both these documents. As a result, the Scheme delivers biodiversity net gain, and substantial improvement regarding habitat units due to the baseline of mostly agricultural fields. In relation to larger animals, there will be space between the fence and the field edge to provide space for larger animals such as deer to move around the edge of the site.
RR-207	Lawrence Beaumont-Hayes	Category 2 (Restrictive Covenants on title NYK411968)	Restriction of agricultural land to produce local food and produce. Impact on rural amenity and countryside that supports many species and biodiversity. Unsightly structures impacting properties and their values.	The Government has identified through its energy policy, most recently in the Overarching National Policy Statement for Energy EN-1 and National Policy Statement for Renewable Energy EN-3, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's Statement of Need **[APP-232],** this includes low carbon energy generation using solar technology. Developing the Scheme at this size will therefore be an important contribution to meeting this need. The Applicant acknowledges that agricultural land will be used for the Scheme. Agricultural land quality was a consideration of the Applicant's site selection process. The Scheme is located mostly on lower quality agricultural land, with the majority of the Scheme being on land not classed as Best and Most Versatile (BMV). For the Solar PV Site, 92.8% of the land used is non BMV land. The Applicant's discussions with farmers who farm areas of the Solar PV Site have also identified that this land is difficult to farm due to climatic factors and that this land is not always farmed to produce food for human consumption instead animal feed and for biomass purposes. The vast majority of agricultural land within the Order limits would be available for return to its existing agricultural use following decommissioning of the Scheme. Decommissioning of the Scheme after 40 years is required and secured via secured by a requirement in Schedule 2 of the Draft DCO **[AS-008]).** The Scheme is therefore a long term temporary use.
RR-376	William John Haywood	Category 1 (assumed rights of access)	Hi I am totally against taking agricultural land out of production when as a country we are not self sufficient, and there are plenty of other sites - warehouse roofs, supermarket roofs and house roofs (recently around 500 houses have been built in Howden and not 1 has a solar panel ..... I fully support solar having just put in 72 panels but they have to be in the right situation.	The Government has identified through its energy policy, most recently in the Overarching National Policy Statement for Energy EN-1 and National Policy Statement for Renewable Energy EN-3, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's Statement of Need **[APP-232],** this includes low carbon energy generation using solar technology. Developing the Scheme at its proposed size will therefore be an important contribution to meeting this need. As discussed in the Statement of Need **[APP-232]** the Applicant recognises that decentralised energy generation on roof tops has an important role to play in decarbonisation, however on its own, smaller scale solar, including rooftop solar, is not likely to deliver a sufficient total capacity at the required pace and at an affordable cost to meet the Government's targets.

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				The Applicant acknowledges that agricultural land will be used for the Scheme. Agricultural land quality was a consideration of the Applicant's site selection process. The Scheme is located mostly on lower quality agricultural land, with the majority of the Scheme being on land not classed as Best and Most Versatile (BMV). For the Solar PV Site, 92.8% of the land used is non BMV land. The Applicant's discussions with farmers who farm areas of the Solar PV Site have also identified that this land is difficult to farm due to climatic factors and that this land is not always farmed to produce food for human consumption instead animal feed and for biomass purposes. The vast majority of agricultural land within the Order limits would be available for return to its existing agricultural use following decommissioning of the Scheme. Decommissioning of the Scheme after 40 years is required and secured via secured by a requirement in Schedule 2 of the Draft DCO **[AS-008]**). The Scheme is therefore a long term temporary use.
RR-169	Joan Mary Lunn	Category 1 (Subsoil interest)	Transport - Single track poorly maintained lanes are unsuitable for the forecasted heavy goods traffic. Two lorries cannot pass so will drive and destroy the verges. Soil- Very heavy clay fields presently under water and have been since before December and show no signs of draining until Spring when the soil will turn to concrete. How does the contractor propose to build the solar panel farm when under water? How are the panels to be drained into waterlogged/ concrete soil? Are their details to show how the dykes will cope with this drainage? How is the excessive heavy goods traffic to be monitored to avoid constant upheaval for the residents? More clarity about the batteries needed as they are a fire hazard and will cause noise pollution on a massive scale? What is the efficiency of the panels, how are they cleaned? Are the panels opaque and so prevent vegetation growth underneath? All this noise will scare away current wildlife, what is the company going to do about it? The level of vehicular access will make cycling/walking along the lands dangerous. This will affect the workers who will be cycling to work along these lanes.	The Framework Construction Traffic Management Plan **[APP-113]** has been developed to include appropriate access routes for construction vehicles which would seek to minimise the impacts and disturbance to local road users. In relation to the point regarding single track roads, access routes have been assessed using industry standard Autotrack software, as provided in Appendix 13-5: Framework Construction Traffic Management Plan, Annex A: Proposed Access Layouts, Visibility Splays and Swept Paths **[APP-114-116].** This has been done to ensure that movements can be made suitably and safely. Where issues were identified, carriageway widening and/or vegetation removal and associated traffic management to facilitate safe implementation will be introduced. Details of how construction traffic will be monitored is provided within Section 6 (Compliance and Enforcement) of the Framework Construction Traffic Management Plan **[APP-113].** This includes details of best practice, contractual conditions, the type of communications provided to construction delivery drivers and the various types of enforcement. Management and controls introduced would also focus on the safety of non-motorised users currently using the road network. The Traffic Regulation Measures Plans **[AS-005, AS-006, AS-007]** outline areas where the Applicant anticipates that traffic marshalls or traffic signal control may be required. These measures would be introduced to assist with enhancing safety for all road users, specifically non-motorised users. The Scheme does not include the provision of batteries. All construction and decommissioning works will be subject to risk assessments as required by the Framework CEMP **[APP-238]** and the Framework DEMP **[APP-240]** which will minimise the risk of impacts from hazards such as fire. Mitigation measures to be implemented during construction and decommissioning are listed within the Framework CEMP **[APP-238]** and DEMP **[APP-240]** respectively, which will inform a detailed CEMP and DEMP and be secured by requirements in Schedule 2 of the draft DCO **[AS-008].**

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				The comment regarding the impact from cleaning panels with water is noted. No cleaning products would be used as specified in Section 2.6 of the Framework Operational Management Plan (Framework OEMP**) [APP-239].** A detailed OEMP (which will need to substantially accord with the Framework OEMP) will be submitted post consent prior to operation which is secured by requirement in Schedule 2 of the draft DCO **[AS-008].** A Flood Risk Assessment **[APP-096], [APP-097]** has been produced for the Scheme and considers risk both to, and arising from, the Scheme. As part of the Flood Risk Assessment, mitigation is proposed to manage the potential impacts of flood risk so that the development does not increase or exacerbate flood risk to others. This mitigation has been informed by site-specific hydraulic modelling which takes into account climate change with respect to the lifetime of the development. A Framework Surface Water Drainage Strategy **[APP-098]** has also been produced for the Scheme which aims to manage surface water from the Scheme. This strategy incorporates Sustainable Drainage Systems (SuDS) to manage surface water from the Solar PV Site so that the Scheme remains safe throughout its lifetime and does not increase flood risk to others. Vegetation has been shown to grow well under solar panels, as the panels track the sun, they move during the day therefore shadow moves allowing light underneath. Grass grows fine in the shade, just like a North facing garden. The bifacial panels actually capture solar irradiation from the back of the panels also. Additionally, the panels provide shade to any sheep and wildlife in summer.
RR-082	Donald Breach	Category 1 (Subsoil interest)	My particular interest is the proposed access route from Newsholme, Reference your letter dated 25/01/2024, ref. EYSF-S56-039, enclosed map access point 16/87 and 16/86. After registering my objections to this access route at two of your consultation meetings and by letter to yourself dated 12 September 2023 I am surprised that this access route is still included in your plan. I consider the access route from Newsholme to be unacceptable for the following reasons; poor access to the village of Newsholme from the A36 main road. This is a straight, narrow road with a high volume of fast moving traffic, any vehicle travelling west to enter Newsholme will need to stop blocking the west bound carriageway creating the potential for rear end collisions. The loop road through Newsholme is designated as "UNSUITABLE FOR HEAVY COODS VEHICLES" the loop road through newsholme is a narrow single vehicle width road, there are no footpaths and pedestrians have to walk in the road Where footpath number 6 joins the loop road there is a blind corner and access is currently restricted by a power line support pole, power line, telephone lines and an oak tree. Due to these restrictions and the limited road width any large vehicle approaching footpath 6 from the east is unable to turn right	As detailed within Table 4 of the Framework Construction Traffic Management Plan **[APP-113],** access to Solar PV Area 3c for HGVs and Tractor-Trailer vehicles during construction will be taken by travelling south on Rowlandhall Lane, before turning into the access and travelling east on internal roads to access 3c. A plan showing this routing is included at Appendix 13-5-5 of the same document. The road through Newsholme will not be used for construction access for the Solar PV Area 3c.

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			onto footpath number 6 To turn on to footpath number 6 any large vehicle would need to enter Newsholme from the west junction off the A63 then drive through the village to the turn off the footpath / loop road junction is a stop for the local school bus. It is also the access point for locals and walkers who regularly use the footpath. There is an alternative access to the project works, Area 3c,from another point. The alternative would be to for all traffic to exit the main A63 road at the west entrance to Newsholme, follow Green Lane to access point 16/90 or continue to access point at Roland Hall Faan. Roland Hall Farm is the shortest distance from a public road to Area 3c and also provides access to the cable connection corridor that runs along the north boundary of Area 3c from Rowland Hall to Brind. Using this alternative route it would not be necessary for traffic to enter Newsholme village and the access route, from Newsholme would not be required. The original plan for The Scotland to England Link 2 Project also included a proposed construction access route from Newsholme following footpath number 6. Following consultation they have agreed that this is not a suitable point of access for construction traffic or heavy goods vehicles and a new construction access for this project will be installed from the main road I trust you will accept that the Newsholme is not an acceptable access route and change your plans accordingly.	
RR-071	David Fielder	Category 1 (Subsoil interest)	The application is far too big and no consideration appears to the devastating effects of this rural area	The Government has identified through its energy policy, most recently in the Overarching National Policy Statement for Energy EN-1 and National Policy Statement for Renewable Energy EN-3, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's Statement of Need **[APP-232],** this includes low carbon energy generation using solar technology. Developing the Scheme at its proposed size will therefore be an important contribution to meeting this need.
RR-349	Stephen Paul Lunn	Category 1 (Subsoil interest)	The site maps provided appear to indicate that hedges on Spaldingington Road (10/45) and Willitoft Road (10/43) which form the southern and western boundaries to my property will be destroyed. This would lead to complete removal of privacy and security for our animals as well as removing windbreaks and the destruction of a number of mature trees. 2. Utilities are situated under the verge at (10/45). 3. Wider verges, which could accommodate road widening are available on the south side of (10/45) and the west side of	Details of the proposed screening and buffers including how existing vegetation is to be retained and the proposed planting are provided in the Framework Landscape and Ecological Management Plan **[APP-246]** and illustrated on the Framework Landscape Masterplan included as Appendix A of the Framework Landscape and Ecological Management Plan [APP-246] and Section 5.4 of the DAS [APP-234]. Existing hedgerow along the northern boundary of Solar PV Site 2f and the eastern boundary of Solar PV Site 2e which are adjacent to Spaldington Road (10/45) and Willitoft Road (10/43) will be retained and maintained to a height between 2.5 m and 3.5 m. The existing hedgerows will 'infilled' with new hedgerow planting where there are gaps. The Framework Construction Environmental Management Plan [APP-238] includes mitigation measures to avoid impacts on existing utility infrastructure above and below ground as a result of excavation and engineering operations, which include:

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			(10/43). In both cases this forms the edge of land already earmarked for the solar site. 4. More widely the whole is subject to considerable flooding, indeed so far this winter the areas allocated for solar panels (10/41) (11/47) and (11/48) are inundated as they have been during most recent winters.	a. Locating the Scheme outside of utilities protected zones; b. Identification of unknown utilities before excavation (for example by scanning using CAT and Genny); c. Consultation and agreement of construction/demobilisation methods will be undertaken with utility asset owners prior to works commencing; and d. Infrastructure that crosses the Scheme will be mapped and avoided through the design. The Draft DCO [AS-008] includes protective provisions for the protection of utility assets. Pre and post construction road condition surveys will also be undertaken at identified locations in consultation with the Local Highway Authority. Sections of the existing carriageway at land parcels 10/43 and 10/45 have been included within the Order Limits in order to facilitate the upgrade of existing accesses into the Solar PV Areas in order to support to construction of the development. A Flood Risk Assessment **[APP-096], [APP-097]** has been produced for the Scheme and considers risk both to, and arising from, the Scheme. As part of the Flood Risk Assessment, mitigation is proposed to manage the potential impacts of flood risk so that the development does not increase or exacerbate flood risk to others. This mitigation has been informed by site-specific hydraulic modelling which takes into account climate change with respect to the lifetime of the development. A Framework Surface Water Drainage Strategy **[APP-098]** has also been produced for the Scheme which aims to manage surface water from the Scheme. This strategy incorporates Sustainable Drainage Systems (SuDS) to manage surface water from the Solar PV Site so that the Scheme remains safe throughout its lifetime and does not increase flood risk to others.
RR-001	Adrian Mallinson	Category 1 (Subsoil interest)	A lot of farmland is going to be lost and the energy that will be generated is only a tiny fraction of what is used in this country. This area is already losing land due to housing developments and warehousing. There will be an adverse effect on wildlife, for example curlews nest in one of the fields near me which is pink on the map ie permanent acquisition of land. We frequently get flood alerts where I live. Cutting trees and hedgerows down will not help with flood risks and the environment in general.	The Government has identified through its energy policy, most recently in the Overarching National Policy Statement for Energy EN-1 and National Policy Statement for Renewable Energy EN-3, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's Statement of Need **[APP-232],** this includes low carbon energy generation using solar technology. Developing the Scheme at its proposed size will therefore be an important contribution to meeting this need. The Scheme avoids and mitigates significant adverse effects on internationally, nationally and locally designated biodviersity sites and other important ecological features such as protected species and habitats. This has been achieved through careful design informed by a design team with qualified ecologists and embedding appropriate mitigation measures during construction, operation and decommissioning phases, including appropriate buffers. An area of habitat enhancement (18.26ha in size) within the eastern portion of Solar PV Area 1e, adjacent to the River Foulness, will be left free of solar PV panels and other infrastructure as part of the Scheme design, and will provide permanent wet grassland habitat for birds that prefer such habitats during the non-breeding season (e.g., golden plover, curlew and lapwing). This has been included within the landscape design (as presented in the Framework LEMP **[APP-246]).** As such, there will not be any significant effects on curlew as a result of the Scheme.

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				A Flood Risk Assessment **[APP-096], [APP-097]** has been produced for the Scheme and considers risk both to, and arising from, the Scheme. As part of the Flood Risk Assessment, mitigation is proposed to manage the potential impacts of flood risk so that the development does not increase or exacerbate flood risk to others. This mitigation has been informed by site-specific hydraulic modelling which takes into account climate change with respect to the lifetime of the development. A Framework Surface Water Drainage Strategy **[APP-098]** has also been produced for the Scheme which aims to manage surface water from the Scheme. This strategy incorporates Sustainable Drainage Systems (SuDS) to manage surface water from the Solar PV Site so that the Scheme remains safe throughout its lifetime and does not increase flood risk to others.
RR-101	Elizabeth Hayes	Category 1 (Subsoil interest)	This project is taking valuable farming land out of commission for up to 40 years. As much of the land is clay, I dispute BOOM's suggestion that sheep may graze between the panels, as they will get footrot. The project is far too big, one of the largest in Europe, and the construction phase will disrupt many people for a number of years.	The Government has identified through its energy policy, most recently in the Overarching National Policy Statement for Energy EN-1 and National Policy Statement for Renewable Energy EN-3, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's Statement of Need **[APP-232],** this includes low carbon energy generation using solar technology. Developing the Scheme at this size will therefore be an important contribution to meeting this need. The Applicant acknowledges that agricultural land will be used for the Scheme. Agricultural land quality was a consideration of the Applicant's site selection process. The Scheme is located mostly on lower quality agricultural land, with the majority of the Scheme being on land not classed as Best and Most Versatile (BMV). For the Solar PV Site, 92.8% of the land used is non BMV land. The Applicant's discussions with farmers who farm areas of the Solar PV Site have also identified that this land is difficult to farm due to climatic factors and that this land is not always farmed to produce food for human consumption instead animal feed and for biomass purposes. The vast majority of agricultural land within the Order limits would be available for return to its existing agricultural use following decommissioning of the Scheme. Decommissioning of the Scheme after 40 years is required and secured via secured by a requirement in Schedule 2 of the Draft DCO [AS-008]). The Scheme is therefore a long term temporary use. As set out in the Design and Access Statement **[APP-234]** design objectives have guided the design response from an early stage to develop a good design that balances the need to maximise renewable energy generation from the Scheme, whilst minimising potential adverse impacts and providing mitigation and enhancement measures where practicable. This has resulted in a Scheme which, with the implementation of mitigation, avoids residual significant adverse effects in relation to designated landscapes; biodiversity sites; protected species or habitats; agricultural land; heritage assets; flood risk; water quality; access; and land uses within the local area. Impacts on the local area and community have therefore been minimised as far as practicable. The Applicant acknowledges that the operation of the Scheme will result in residual significant adverse effects upon the local landscape character and a small number of visual receptors, as presented in the Landscape and Visual Amenity Assessment within the Environmental

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				Statement **[AS-014].** However, the Applicant has carefully designed the Scheme to ensure landscape and visual impacts are minimised as far as practicable by proposing a comprehensive landscape and ecological design and increased connectivity and local access through the landscape as discussed in the Design and Access Statement **[APP-234]** and in the Framework Landscape and Ecological Management Plan **[APP-246].** Both documents include the Framework Landscape Masterplan illustrating this design. The Applicant has commissioned an independent consultant to review the feasibility of sheep grazing on the grassland beneath solar panels, this has shown it is feasible for sheep to graze on the land. More detail is contained within the Grazing Feasibility Study, Appendix 2-1, ES Volume 2 **[APP-071].** With regard to weed management, grazing by sheep is the Applicant's preferred option for the management of the grassland created within the solar farm. Should grazing not be possible in some or all areas of the Solar PV Site, grassland will instead be managed by mowing as secured in the Framework Operational Environmental Management Plan **[APP-239]** which is secured in the draft DCO **[AS-008].** The flock would be of a suitable size for the land available, rotated as required to ensure that no areas were over-grazed and that the land being currently grazed was sufficiently dry to support them thereby avoiding potential damage to soil structure.
RR-100	Elizabeth Breach	Category 1 (Subsoil interest)	Most of the roads in the area are single track roads which are not suitable for construction traffic. The Hamlet of Newsholme is designated as unsuitable for for heavy goods vehicles, Newsholme and the footpath between Newsholme and Brind should not be used as an access route for this project. Locating solar panels on farm land will reduce our capacity to produce food and make us more reliant on food imports in the future. The loss of 1445 Hectares of good quality farm land to produce electricity is unacceptable. Solar panels should be sited on brown field land or on the roofs of buildings, there are many hectares of roof space currently available in the UK. It should be a condition of any planning consent that all domestic and industrial building are fitted with solar panels so that they are self sufficient in electricity. A solar farm on this scale effectively converts a rural area into an industrial site which will have a significant negative impact on the quality of life the local residents. There should be a limit on the size and number of solar farms permitted in a given area to ensure the impact on the local environment is minimised	The Framework Construction Traffic Management Plan **[APP-238]** has been developed to include appropriate access routes for construction vehicles which would seek to minimise the impacts and disturbance to local road users. In relation to the point regarding single track roads, access routes have been assessed using industry standard Autotrack software, as provided in Appendix 13-5: Framework Construction Traffic Management Plan, Annex A: Proposed Access Layouts, Visibility Splays and Swept Paths **[APP-133].** This has been done to ensure that movements can be made suitably and safely. Where issues were identified, carriageway widening and/or vegetation removal and associated traffic management to facilitate safe implementation will be introduced. As detailed within Table 4 of the Framework Construction Traffic Management Plan **[APP-133],** access to Solar PV Area 3c for HGVs and Tractor-Trailer vehicles will be taken by travelling south on Rowlandhall Lane, before turning into the access and travelling east on internal roads to access 3c. Subsequently, the road through Newsholme will not be used for construction access for the Solar PV Area 3c. There will also be no usage of the public right of way in Newsholme (reference WRESF06) as an access route for vehicles. The Government has identified through its energy policy, most recently in the Overarching National Policy Statement for Energy EN-1 and National Policy Statement for Renewable Energy EN-3, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's Statement of Need **[APP-232],** this includes low carbon energy generation using solar technology. Developing the Scheme at its proposed size will therefore be an important contribution to meeting this need. As discussed in the Statement of Need **[APP-232]** the Applicant recognises that decentralised energy generation on roof tops has an important role to play in decarbonisation, however on its own, smaller scale solar, including rooftop solar, is not likely to deliver a sufficient total capacity at the required pace and at an affordable cost to meet the Government's targets.

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				The Applicant acknowledges that agricultural land will be used for the Scheme. Agricultural land quality was a consideration of the Applicant's site selection process. The Scheme is located mostly on lower quality agricultural land, with the majority of the Scheme being on land not classed as Best and Most Versatile (BMV). For the Solar PV Site, 92.8% of the land used is non BMV land. The Applicant's discussions with farmers who farm areas of the Solar PV Site have also identified that this land is difficult to farm due to climatic factors and that this land is not always farmed to produce food for human consumption instead animal feed and for biomass purposes. The vast majority of agricultural land within the Order limits would be available for return to its existing agricultural use following decommissioning of the Scheme. Decommissioning of the Scheme after 40 years is required and secured via secured by a requirement in Schedule 2 of the Draft DCO **[AS-008]).** The Scheme is therefore a long term temporary use. As set out in the Design and Access Statement **[APP-234]** design objectives have guided the design response from an early stage to develop a good design that balances the need to maximise renewable energy generation from the Scheme, whilst minimising potential adverse impacts and providing mitigation and enhancement measures where practicable. This has resulted in a Scheme which, with the implementation of mitigation, avoids residual significant adverse effects in relation to designated landscapes; biodiversity sites; protected species or habitats; agricultural land; heritage assets; flood risk; water quality; access; and land uses within the local area. Impacts on the local area and community have therefore been minimised as far as practicable. The Applicant acknowledges that the operation of the Scheme will result in residual significant adverse effects upon the local landscape character and a small number of visual receptors, as presented in the Landscape and Visual Amenity Assessment within the Environmental Statement **[AS-014].** However, the Applicant has carefully designed the Scheme to ensure landscape and visual impacts are minimised as far as practicable by proposing a comprehensive landscape and ecological design and increased connectivity and local access through the landscape as discussed in the Design and Access Statement **[APP-234]** and in the Framework Landscape and Ecological Management Plan **[APP-246].** Both documents include the Framework Landscape Masterplan illustrating this design.
RR-363	Terry Hayes	Category 1 (Subsoil interest)	The size and scale of the project is far too big, there is a place for solar but not on this scale, it will industrialise a large swathe of countryside which should be used for growing crops. The UK imports 40% of its food from abroad, and this could increase, Ukraine is responsible for 12% of the world's wheat and the UK imports 15% of it's milling wheat. Farms such as this will contribute to more imports, which in itself is not green.	The Government has identified through its energy policy, most recently in the Overarching National Policy Statement for Energy EN-1 and National Policy Statement for Renewable Energy EN-3, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's Statement of Need **[APP-232],** this includes low carbon energy generation using solar technology. Developing the Scheme at its proposed size will therefore be an important contribution to meeting this need. As discussed in the Statement of Need **[APP-232]** the Applicant recognises that decentralised energy generation on roof tops has an important role to play in decarbonisation, however on its own, smaller scale solar, including rooftop solar, is not likely to deliver a sufficient total capacity at the required pace and at an affordable cost to meet the Government's targets.

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RR-182	John Yorke	Category 1 (Subsoil interest)	The solar park will be on land that is essential for agriculture. We cannot keep taking good agricultural land that is used to feed the nation and hope we can continue to buy food from abroad.	The Applicant acknowledges that agricultural land will be used for the Scheme. Agricultural land quality was a consideration of the Applicant's site selection process. The Scheme is located mostly on low and moderate quality agricultural land, with the majority of the Scheme being on land not classed as Best and Most Versatile (BMV). For the Solar PV Site, 92.8% of the land used is non BMV land. The Applicant's discussions with farmers who farm areas of the Solar PV Site have also identified that this land is difficult to farm due to climatic factors and that this land is not always farmed to produce food for human consumption instead animal feed and for biomass purposes. The vast majority of agricultural land within the Order limits would be available for return to its existing agricultural use following decommissioning of the Scheme. Decommissioning of the Scheme after 40 years is required and secured via secured by a requirement in Schedule 2 of the Draft DCO **[AS-008]).** The Scheme is therefore a long term temporary use.
RR-290	Paul Adrian Joseph Taylor	Category 1 (Subsoil interest)	The project will surround my property on 3 sides, if these were separate applications they would probably not be allowed on cumulative grounds. There is a total lack of adequate screening and borders. We need restrictions on noise and traffic. I am very worried about both mine and my wife's mental health caused by the distress this is causing.	The Applicant recognises that the potential for future environmental changes associated with the Scheme during construction, operation and decommissioning are currently a source of concern for local residents. To address this concern, the Applicant has undertaken a comprehensive and robust Environmental Impact Assessment so that any likely significant effects of the Scheme can be identified and mitigated. Chapter 14: Human Health within the Environmental Statement **[APP-066]** assesses potential effects of the Scheme on health and wellbeing of local residents. The assessment takes a holistic approach to health and considers a wide range of health determinants which are relevant to quality of life and amenity. The assessment considers elements of the Scheme which could affect mental health (for example changes in landscape and visual amenity, noise, access to open space and employment) as well as physical health (for example associated with air pollution and access to healthcare facilities). No significant adverse effects are identified with regards to human health. One of the Scheme's design objectives is to ensure the design responds sensitively to residential properties in proximity to the Scheme regarding visual impact, noise and lighting. This

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				design approach is in accordance paragraph 5.10.21 of NPS EN-1. To achieve this, the Scheme design therefore retains existing vegetation as far as practicable and provides carefully designed planting to provide screening. The design also incorporates buffers from residential properties to the solar PV infrastructure which are shown on the Framework Landscape Masterplan and the Applicant has committed to positioning noise emitting Field Stations 250 metres (m) or further from residential properties to avoid disturbance from operational noise. The two Grid Connection Substations proposed as part of the Scheme are also greater than 250 m from residential properties. The Scheme is also not proposing any visible lighting from CCTV or artificial lighting for security purposes. These design principles are set out in the Outline Design Principles Statement **[APP-235].** The detailed design for the Scheme, which will need to be approved post consent prior to construction by East Riding of Yorkshire Council and North Yorkshire Council (the relevant local authorities), must be in accordance with the design principles set out in the Outline Design Principles Statement **[APP-235]** and this is secured by a requirement in Schedule 2 to the Draft Development Consent Order **[AS-008].** Construction vehicle movements will be managed through the Framework Construction Traffic Management Plan **[APP-113].** This document sets out the management of construction traffic along the local highway network within the vicinity of the Site during the construction period of the works, in order to limit any potential disruptions and implications on the wider transport network as well as for the existing road users. The Framework Construction Traffic Management Plan **[APP-133]** will inform a detailed Construction Traffic Management Plan that will be secured by a requirement in Schedule 2 of the draft DCO **[AS-008].**
RR-139	Heather Longbottom	Category 1 (Subsoil interest)	I consider this application will have a detrimental effect on the countryside environment and the people who choose to live here because they want to live in a rural area not a semi industrial one. The Prime Minister recently pledged to support farmers and ensure food security which is as important as energy security. The land proposed is deemed to be poor grade but a lot of it currently produces crops. Where are we to get these lost crops from? We need a balance between energy and food security and not concentrate solely on energy because it is more profitable for large landowners. The roads in this area have already been decimated by large farm vehicles and will not be able to withstand the construction traffic that will be required to build the solar farm. Who will be responsible for mending the roads ? Some families are going to be completely surrounded by solar panels instead of looking onto open countryside, how is this fair? Residents have chosen to live and work in the rural East Riding . We do not have the facilities or transport links that towns have but that is a choice we have made.	The Government has identified through its energy policy, most recently in the Overarching National Policy Statement for Energy EN-1 and National Policy Statement for Renewable Energy EN-3, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's Statement of Need **[APP-232]**, this includes low carbon energy generation using solar technology. Developing the Scheme at this size will therefore be an important contribution to meeting this need. Agricultural land quality was a consideration of the Applicant's site selection process as described in Chapter 3: Alternatives and Design Evolution within the Environmental Statement **[APP-055]**. In accordance with NPS EN-1 paragraph 5.11.12 and NPS EN-3 paragraphs 2.10.29 the Applicant has taken a sequential approach to the use of agricultural land considering whether land of lower grade is available and suitable. Following the identification of an area of search derived from the point of connection at the National Grid Drax Substation the Applicant did not identify any alternative sites which would be of lower grade agricultural land (compared to the majority of the Order limits) that were available or considered suitable for the Scheme and its objectives. The Scheme is located mostly on lower quality agricultural land, with the majority of the Scheme being on land not classed as Best and Most Versatile (BMV). For the Solar PV Site, 92.8% of the land used is non BMV land. The Applicant's discussions with farmers who farm areas of the Solar PV Site have also identified that this land is difficult to farm due to climatic factors and that this land is not always farmed to produce food for human consumption instead animal feed and for biomass purposes.

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			It appears that now we have to suffer living in an industrial area when ,with more planning and consideration for others ,solar panels could be sited on industrial buildings locally in Howden and Goole. What will happen to the panels as they age and become obsolete as technology develops? Who are the people behind Boom? What happens if they cease to exist in the future? It appears that the company has not considered the comments that were made during the consultation period.	The vast majority of agricultural land within the Order limits would also be available for return to its existing agricultural use following decommissioning of the Scheme. In addition, the conversion of arable land to grassland during the 40 year operational period has the potential to accrue improvement to soil function over a large area. The Scheme design is the result of an iterative design process which delivers the Scheme's functionality, the generation of a large amount of renewable electricity using single axis tracker solar technology, whilst addressing the local context and setting within which it is located. The Applicant's design team has worked collaboratively to provide an integrated and responsive design which has been informed by the process of environmental impact assessment, statutory consultation and stakeholder engagement. The Applicant acknowledges that the operation of the Scheme will result in residual significant adverse effects upon the local landscape character and a small number of visual receptors, as presented in the Landscape and Visual Amenity Assessment within the Environmental Statement **[AS-014]**. However, the Applicant has carefully designed the Scheme to ensure landscape and visual impacts are minimised as far as practicable by proposing a comprehensive landscape and ecological design and increased connectivity and local access through the landscape as discussed in the Design and Access Statement **[APP-234]** and in the Framework Landscape and Ecological Management Plan **[APP-246]**. Both documents include the Framework Landscape Masterplan illustrating this design. One of the Scheme's design objectives is to ensure the design responds sensitively to residential properties in proximity to the Scheme regarding visual impact, noise and lighting. This design approach is in accordance paragraph 5.10.21 of NPS EN-1. To achieve this, the Scheme design therefore retains existing vegetation as far as practicable and provides carefully designed planting to provide screening. The design also incorporates buffers from residential properties to the solar PV infrastructure which are shown on the Framework Landscape Masterplan and the Applicant has committed to positioning noise emitting Field Stations 250 metres (m) or further from residential properties to avoid disturbance from operational noise. The two Grid Connection Substations proposed as part of the Scheme are also greater than 250 m from residential properties. The Scheme is also not proposing any visible lighting from CCTV or artificial lighting for security purposes. These design principles are set out in the Outline Design Principles Statement **[APP-235]**. The detailed design for the Scheme, which will need to be approved post consent prior to construction by East Riding of Yorkshire Council and North Yorkshire Council (the relevant local authorities), must be in accordance with the design principles set out in the Outline Design Principles Statement **[APP-235]** and this is secured by a requirement in Schedule 2 to the Draft Development Consent Order **[AS-008]**. Construction vehicle movements will be managed through the Framework Construction Traffic Management Plan **[APP-113]**. The document will focus on the management of construction traffic along the local highway network within the vicinity of the Site during the construction period of the works, in order to limit any potential disruptions and implications on the wider transport network as well as for the existing road users. The Framework Construction Traffic

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				Management Plan **[APP-133]** will inform a detailed Construction Traffic Management Plan that will be secured by a requirement in Schedule 2 of the draft DCO **[AS-008]**. With regard to the condition of the roads, pre and post construction road condition surveys will be undertaken at identified locations in coordination with the relevant Local Highway Authority. This is included at paragraph 5.2.3 of the aforementioned Framework Construction Traffic Management Plan **[APP-113]**. Any damage identified through this process would be made good with the relevant Local Highway Authority consulted. As discussed in the Statement of Need **[APP-232]** the Applicant recognises that decentralised energy generation on roof tops has an important role to play in decarbonisation, however on its own, smaller scale solar, including rooftop solar, is not likely to deliver a sufficient total capacity at the required pace and at an affordable cost to meet the Government's targets. The Applicant carried out three rounds of consultation during the pre-application period ahead of finalising its proposals for the Scheme. All responses received to the statutory consultation and the Applicant's response to these can be found in Appendix P in Consultation Report Appendices **[APP-041 to APP-045]**. There have been changes made to the Scheme as a result of consultation or specific requests, which are outlined in Section 4.7 and 7.8 of the Consultation Report **[APP-025]**. Solar panels are guaranteed for 30 years, with the oldest solar panels functioning are at over 40 years old. When their efficiency starts to reduce, stocks of replacement panels will be available if they are required. The Applicant will have ongoing relationships with solar panel manufacturers to allow a solution if panels need replacing. The Funding Statement **[APP-022]** sets out the corporate structure of Boom, including an organogram, providing ownership details.
RR-102	Elizabeth Jane Shutt	Category 1 (Subsoil interest)	This has been agricultural area since the Domesday Book and this project will be taking land which has been used for food production out of use. The project is going to seriously affect the roads which are single tracks which are already in a poor condition due pot holes, poor surface and the vehicles using them are tearing up the grass verges construction traffic will only make this worse. The proposed site of the substation off Rowland Hall Lane will mean that substation will be accessed through a field gate that is positioned so that any vehicle travelling from the A63 up Rowland Hall Lane and crossing the railway crossing will not be able to see a vehicle coming in the opposite direction because the entrance to the field is in a blind spot.	The Applicant acknowledges that agricultural land will be used for the Scheme however respectfully disagrees that this is valuable for agricultural production and will never recover. Agricultural land quality was a consideration of the Applicant's site selection process as described in Chapter 3: Alternatives and Design Evolution within the Environmental Statement **[APP-055].** The Scheme is located mostly on lower quality agricultural land, with the majority of the Scheme being on land not classed as Best and Most Versatile (BMV). For the Solar PV Site, 92.8% of the land used is non BMV land. The Applicant's discussions with farmers who farm areas of the Solar PV Site have also identified that this land is difficult to farm due to climatic factors and that this land is not always farmed to produce food for human consumption instead animal feed and for biomass purposes. The vast majority of agricultural land within the Order limits would also be available for return to its existing agricultural use following decommissioning of the Scheme. Chapter 15: Soils and Agricultural Land within the Environmental Statement **[APP-067]** concludes that a very small amount (0.41 ha) of BMV Subgrade 3a agricultural land for tree planting would be permanently

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			This project is going to have an impact on the wild life in the area. Initially the wildlife will frightened away during the construction which is particularly concerning for some rare ground nesting birds who nest in the field [REDACTED]. Although small animals may be able to gain entrance to the land once the construction is complete larger animals such as deer, foxes and badgers will be excluded from their established habitat they will be forced onto the roads with the potential for more road traffic accidents. It will also increase the potential for poachers to shoot the animals because the animals will be unable to seek their current cover. My property is going to be impacted by the noise and disruption caused by of the construction and in the long term the potential noise from the substation and light pollution from any security lights installed on the compounds where the solar panels are to be placed. I am concerned that the level rural crime which is already impacting on this area will increase due to the presence of the solar panels in the proximity to my property. The installation of the solar panels is likely to damage the drainage of land which is already subject to flooding at times. If piles or concrete pads are used to site the solar panels then this will make it extremely difficult to reinstate the land to agricultural use at the end of the project. I run a holiday cottage business from my property and I am concerned that the unsightly appearance of this solar farm is likely impact on visitors coming to or returning to my business.	removed from agricultural use but would provide a permanent ecological benefit. In relation to non-BMV land, 8.97 ha of Subgrade 3b agricultural land would be permanently removed from agricultural use as a result of tree and hedge planting, and further 2 ha of Subgrade 3b agricultural land would be permanently removed as a result of the potential retention of the Grid Connection Substations and associated accesses. In addition, the conversion of arable land to grassland during the 40 year operational period has the potential to accrue improvement to soil function over a large area. The Scheme design is the result of an iterative design process which delivers the Scheme's functionality, the generation of a large amount of renewable electricity using single axis tracker solar technology, whilst addressing the local context and setting within which it is located. The Applicant's design team has worked collaboratively to provide an integrated and responsive design which has been informed by the process of environmental impact assessment, statutory consultation and stakeholder engagement. As set out in the Design and Access Statement **[APP-234]** design objectives have guided the design response from an early stage to develop a good design that balances the need to maximise renewable energy generation from the Scheme, whilst minimising potential adverse impacts and providing mitigation and enhancement measures where practicable. This has resulted in a Scheme which, with the implementation of mitigation, avoids residual significant adverse effects in relation to designated landscapes; biodiversity sites; protected species or habitats; agricultural land; heritage assets; flood risk; water quality; access; and land uses within the local area. Impacts on the local area and community have therefore been minimised as far as practicable. One of the Scheme's design objectives is to ensure the design responds sensitively to residential properties in proximity to the Scheme regarding visual impact, noise, and lighting. This design approach is in accordance with paragraph 5.10.21 of NPS EN-1.To achieve this, the Scheme design retains existing vegetation as far as practicable and proposes carefully designed planting to provide screening. The design also incorporates buffers from residential properties to the solar PV infrastructure which are shown on the Framework Landscape Masterplan and the design commits to positioning noise emitting Field Stations 250 metres (m) or further from residential properties. The two Grid Connection Substations proposed as part of the Scheme are also greater than 250 m from residential properties. The Scheme incorporates fencing and security design measures which will mitigate against the risk of criminal activity. This includes internal facing closed circuit television (CCTV) systems which use infra-red technology avoiding the need for lighting. These will be installed around the perimeter of the operational areas of the Solar PV Site. These measures are described in Chapter 2: The Scheme of the Environmental Statement **[APP-054].** These design principles are set out in the Outline Design Principles Statement **[APP-235].** The detailed design for the Scheme, which will need to be approved post consent prior to construction by East Riding of Yorkshire Council and North Yorkshire Council (the relevant local authorities), must be in accordance with the design principles set out in the Outline Design

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				Principles Statement **[APP-235]** and this is secured by a requirement in Schedule 2 to the Draft Development Consent Order **[AS-008].** Construction vehicle movements will be managed through the Framework Construction Traffic Management Plan **[APP-113].** The document will focus on the management of construction traffic along the local highway network within the vicinity of the Site during the construction period of the works, in order to limit any potential disruptions and implications on the wider transport network as well as for the existing road users. The Framework Construction Traffic Management Plan **[APP-133]** will inform a detailed Construction Traffic Management Plan that will be secured by a requirement in Schedule 2 of the draft DCO **[AS-008].** With regard to the condition of the roads, pre and post construction road condition surveys will be undertaken at identified locations in coordination with the relevant Local Highway Authority. This is set out at paragraph 5.2.3 of the aforementioned Framework Construction Traffic Management Plan **[APP-113].** In relation to the point regarding single track roads, access routes have been assessed using industry standard Autotrack software, as provided in Appendix 13-5: Framework Construction Traffic Management Plan, Annex A: Proposed Access Layouts, Visibility Splays and Swept Paths **[APP-113].** This has been done to ensure that movements can be made suitably and safely. Where issues were identified, carriageway widening and/or vegetation removal and associated traffic management to facilitate safe implementation will be introduced. The Applicant is currently liaising with East Riding of Yorkshire Council in order to agree passing place locations on Rowlandhall Lane to support to the construction of the Scheme. The Applicant can confirm that construction vehicles will access Compound E via the B1228 and Wood Lane in order to prevent construction vehicles accessing Rowlandhall Lane via the village of Newsholme. A Flood Risk Assessment **[APP-097]** has been produced for the Scheme and considers risk both to, and arising from, the Scheme. This includes both the Solar PV Site and for the Grid Connection Corridor. As part of the Flood Risk Assessment, mitigation is proposed to manage the potential impacts of flood risk so that the development does not increase or exacerbate flood risk to others. This mitigation has been informed by site-specific hydraulic modelling which takes into account climate change with respect to the lifetime of the development. A Framework Surface Water Drainage Strategy **[APP-098]** has also been produced for the Scheme which aims to manage surface water from the Scheme. This strategy incorporates Sustainable Drainage Systems (SuDS) to manage surface water from the Solar PV Site so that the Scheme remains safe throughout its lifetime and does not increase flood risk to others. As set out in Chapter 8: Ecology of the Environmental Statement **[APP-060]** the construction of the Scheme will be undertaken over several months and will not impact upon retained habitats used by breeding birds (such as woodland and hedgerows), which will maintain connectivity across the Site for the majority of breeding bird species (such as those using hedgerows). Therefore, there will be no fragmentation of habitats used by breeding birds. Where construction

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				cannot avoid nesting birds, then nesting bird checks will be undertaken by an ornithologist, as set out in the Construction Environmental Management Plan **[APP-238]** which will inform a detailed Construction Environmental Management Plan and be secured by requirement 11 in the draft DCO, which is being updated and will be submitted at Deadline 1 of the Examination. The embedded landscape design of the Scheme provides large areas of grassland habitat, including areas free from panels, and field margins, that would provide alternative habitat for ground nesting birds. In relation to larger animals, there will be space between the fence and the field edge to provide space for larger animals such as deer to move around the edge of the site.
RR-016	Angie Yorke	Category 1 (Subsoil interest)	Loss of farming land, Construction pollution and road alterations affecting my home.	The Applicant acknowledges that agricultural land will be used for the Scheme. Agricultural land quality was a consideration of the Applicant's site selection process as described in Chapter 3: Alternatives and Design Evolution within the Environmental Statement **[APP-055].** The Scheme is located mostly on lower quality agricultural land, with the majority of the Scheme being on land not classed as Best and Most Versatile (BMV). For the Solar PV Site, 92.8% of the land used is non BMV land. The Applicant's discussions with farmers who farm areas of the Solar PV Site have also identified that this land is difficult to farm due to climatic factors and that this land is not always farmed to produce food for human consumption instead animal feed and for biomass purposes. The vast majority of agricultural land within the Order limits would also be available for return to its existing agricultural use following decommissioning of the Scheme. Chapter 15: Soils and Agricultural Land within the Environmental Statement **[APP-067]** concludes that a very small amount (0.41 ha) of BMV Subgrade 3a agricultural land for tree planting would be permanently removed from agricultural use but would provide a permanent ecological benefit. In relation to non-BMV land, 8.97 ha of Subgrade 3b agricultural land would be permanently removed from agricultural use as a result of tree and hedge planting, and further 2 ha of Subgrade 3b agricultural land would be permanently removed as a result of the potential retention of the Grid Connection Substations and associated accesses. In addition, the conversion of arable land to grassland during the 40 year operational period has the potential to accrue improvement to soil function over a large area. Construction vehicle movements will be managed through the Framework Construction Traffic Management Plan **[APP-113].** Theis document I focuses on the management of construction traffic along the local highway network within the vicinity of the Site during the construction period of the works, in order to limit any potential disruptions and implications on the wider transport network as well as for the existing road users. The Framework Construction Traffic Management Plan **[APP-133]** will inform a detailed Construction Traffic Management Plan that will be secured by a requirement in Schedule 2 of the draft DCO **[AS-008].**

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RR-293	Paul Dignan	Category 1 (Subsoil interest)	Looking at the mapping provided I would submit heavy infrastructure vehicular access should be from the Blue zone 16/89,16/90 and 16/91. I live at the side of [REDACTED] These country lanes are narrow and not maintained and the roads state not suitable for HGVs . I have no objection to smaller vehicular maintenance access when and if this project is completed.	As correctly observed, HGV access to Compound C will be taken from an access off Rowlandhall Lane using land areas 16/89,16/90 and 16/91. Construction vehicle movements will be managed through the Framework Construction Traffic Management Plan **[APP-113].** Theis document I focuses on the management of construction traffic along the local highway network within the vicinity of the Site during the construction period of the works, in order to limit any potential disruptions and implications on the wider transport network as well as for the existing road users. The Framework Construction Traffic Management Plan **[APP-133]** will inform a detailed Construction Traffic Management Plan that will be secured by a requirement in Schedule 2 of the draft DCO **[AS-008].** With regard to the condition of the roads, pre and post construction road condition surveys will be undertaken at identified locations in consultation with the relevant Local Highway Authority.
RR-006	Alex Moon	Category 1 (Subsoil interest)	Scale, impact on communities, impact on wildlife, absence of openness during consultation and it goes on.	The Government has identified through its energy policy, most recently in the Overarching National Policy Statement for Energy EN-1 and National Policy Statement for Renewable Energy EN-3, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's Statement of Need **[APP-232],** this includes low carbon energy generation using solar technology. Developing the Scheme at its proposed size will therefore be an important contribution to meeting this need. The Scheme design is the result of an iterative design process which delivers the Scheme's functionality, the generation of a large amount of renewable electricity using single axis tracker solar technology, whilst addressing the local context and setting within which it is located. The Applicant's design team has worked collaboratively to provide an integrated and responsive design which has been informed by the process of environmental impact assessment, statutory consultation and stakeholder engagement. The Applicant carried out three rounds of consultation during the pre-application period ahead of finalising its proposals for the Scheme. Consultation enabled the Applicant ton secure valuable feedback to inform the Scheme proposals. At statutory and targeted consultations, a full suite of consultation documents was provided to aid stakeholders in their understanding of the Scheme. The Applicant promoted that these materials could be made available in large print and alternative formats, to ensure that they could be read by as many people as possible. The Applicant also encouraged contact with the project team during the statutory and targeted consultations via email, freephone and Freepost to answer any queries or questions. As set out in the Design and Access Statement **[APP-234]** design objectives have guided the design response from an early stage to develop a good design that balances the need to maximise renewable energy generation from the Scheme, whilst minimising potential adverse impacts and providing mitigation and enhancement measures where practicable. This has resulted in a Scheme which, with the implementation of mitigation, avoids residual significant adverse effects in relation to designated landscapes; biodiversity sites; protected species or habitats; agricultural land; heritage assets; flood risk; water quality; access; and land uses within

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				the Howden area. Impacts on the local area have therefore been minimised as far as practicable. The Applicant acknowledges that the operation of the Scheme will result in residual significant adverse effects upon the local landscape character and a small number of visual receptors, as presented in the Landscape and Visual Amenity Assessment within the Environmental Statement **[AS-014]**. However, the Applicant has carefully designed the Scheme to ensure landscape and visual impacts are minimised as far as practicable by proposing a comprehensive landscape and ecological design and increased connectivity and local access through the landscape as discussed in the Design and Access Statement **[APP-234]** and in the Framework Landscape and Ecological Management Plan **[APP-246]**. Both documents include the Framework Landscape Masterplan illustrating this design. As set out in Chapter 8: Ecology, ES Volume 1 **[APP-060]** the Scheme avoids and mitigates significant adverse effects on internationally, nationally and locally designated sites and other important ecological features such as protected species and habitats. This has been achieved through careful design informed by a design team with qualified ecologists and embedding appropriate mitigation measures during construction, operation and decommissioning phases, including appropriate buffers. In addition to protecting existing features of biodiversity value, the Applicant has also taken opportunities to maximise the enhancement of the biodiversity value of the Solar PV Site and other parts of the Scheme where relevant, including within field margins, undeveloped areas set aside for biodiversity enhancement, and in the land between and below solar PV infrastructure. This is explained in Section 5 of the Planning Statement **[APP-233]** and in the Framework LEMP **[APP-246]** and Design and Access Statement **[APP-234]** and illustrated on the landscape masterplan provided in both these documents. As a result, the Scheme delivers biodiversity net gain, and substantial improvement regarding habitat units due to the baseline of mostly agricultural fields. In relation to larger animals, there will be space between the fence and the field edge to provide space for larger animals such as deer to move around the edge of the site.
RR-199	Kath Westin	Category 1 (Subsoil interest)	This development is immediately opposite my property. I have received details of further land aquisition but no exact information as to what it entails and how it may affect my own land ownership. I live on a single track road that is unsuitable for any vehicle over 7.5 tons. Services such as water and broadband are laid in the grass verges and these services are vunerable to breakdown when heavy traffic goes onto the verges. Openreach and Yorkshire water are called out with great regularity to repair these services.	The Applicant carried out three rounds of consultation with the local community during the pre-application period to take into account feedback to help refine the Scheme proposals. Through this process, the Applicant carried out diligent inquiry in order to identify all persons who, by virtue of the nature of the interest they have in land, and the location of that land in relation to the Applicant's Order Limits, fall within the categories set out in Section 44 of the Planning Act 2008 for the Scheme. Land referencing has been undertaken throughout the pre-application period to ensure that any changes in ownership or new interests have been identified, consulted and subject to engagement. This was supplemented by ongoing one-to-one engagement with the affected land interests by the Applicant's appointed land agent.

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			The screening for the proposed solar farm has not been properly detailed ie is it to be mature planting or whips. As a horticulurist I know that if it is whips it will be many years before it provides adequate screening. My property is close enough to the road to be severely disturbed by the increase in traffic. My residential amenity is going to be severely compromised. I moved to the area for the peace and quiet, the access to a good footpath network, quiet roads suitable for hacking my horse on, the plethora of wildlife that can be seen from my windows to name but a few of the reasons for moving to the area. Had I wanted to live next to an industrial site I would have done so. The landscape around Spaldington is going to look like one big industrial estate should this solar farm be given the go ahead. Why are these panels not put on new build housing, new warehousing/industrial estates, supermarkets etc where they would be less intrusive but also still be of benefit to the national grid. The solar farm site is very spread out and it makes no sense. It is going to permanently affect the lives of residents in several villages. It is not a small scale solar farm. Wildlife will be severely impacted. Security fencing is not going to deter thieves and that will have an impact on the security of residential properties. The solar farm will have an impact on the mental health of many residents. No mitigation for the varying effects this solar farm will have on residential amenity and residents mental health or other issues has been put forward in the application.	The Framework Construction Environmental Management Plan **[APP-238]** includes mitigation measures to avoid impacts on existing utility infrastructure above and below ground as a result of excavation and engineering operations, which include: • Locating the Scheme outside of utilities protected zones; • Identification of unknown utilities before excavation (for example by scanning using CAT and Genny); • Consultation and agreement of construction/demobilisation methods will be undertaken with utility asset owners prior to works commencing; and • Infrastructure that crosses the Scheme will be mapped and avoided through the design. The Draft DCO **[AS-008]** includes protective provisions for the protection of utility assets. Pre and post construction road condition surveys will also be undertaken at identified locations in consultation with the Local Highway Authority. As set out in Chapter 13: Traffic and Transport, ES Volume 1 **[APP-065]** there would be no significant adverse effects on road users, pedestrians, equestrians or cyclists and road links in terms of severance, delay, amenity, fear and intimidation, or accidents and safety in relation to access. With regard to total traffic and HGV increase a residual significant adverse effect is expected at only one road link – Link 15 the B1228 (Station Road) due to the level of traffic generated by construction workers. Impacts on the local highway network during the construction phase would be temporary and would be managed through the embedded mitigation measures described above. This includes the preparation of a Construction Traffic Management Plan secured by requirement 13 of the DCO (see draft DCO **[AS-008]**) which is required to be in accordance with the Framework Construction Traffic Management Plan **[APP-113].** The Framework Construction Traffic Management Plan **[APP-113]** at Annex A includes access designs, visibility splays and swept path analysis demonstrating the proposed accesses are suitable for their intended use. The Framework Construction Traffic Management Plan **[APP-113]** will focus on the management of construction traffic along the local highway network within the vicinity of the Site during the construction period of the works, in order to limit any potential disruptions and implications on the wider transport network as well as for the existing road users. The Framework Construction Traffic Management Plan **[APP-113]** also includes details of appropriate access routes for construction vehicles which seeks to minimise the impacts and disturbance to local road users **[APP-113].** With regard to single track roads, access routes have been tracked using industry standard Autotrack software, as provided in Appendix 13-5: Framework Construction Traffic Management Plan, Annex A: Proposed Access Layouts, Visibility Splays and Swept Paths within the Environmental Statement **[APP-114, APP-15, APP-116].** This has been done to ensure that movements can be made suitably and safely. Where issues were identified, carriageway widening and/or vegetation removal and associated traffic management to facilitate safe implementation would be introduced. The Framework Construction Traffic Management Plan **[APP-113]** provides full details of embedded mitigation measures that are proposed to prevent or reduce potential adverse effects associated with traffic on roads in the Spaldington area. Any

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large vehicles required for the construction of the Scheme will use defined routes to arrive at the compound locations, as described within Section 4 of the Framework Construction Traffic Management Plan **[APP-113].**

With regard to the condition of the roads, pre and post construction road condition surveys will be undertaken at identified locations in coordination with the relevant Local Highway Authority.

The Applicant acknowledges that the operation of the Scheme will result in residual significant adverse effects upon the local landscape character and a small number of visual receptors, as presented in the Landscape and Visual Amenity Assessment within the Environmental Statement **[AS-014].** However, the Applicant has carefully designed the Scheme to ensure landscape and visual impacts are minimised as far as practicable by proposing a comprehensive landscape and ecological design and increased connectivity and local access through the landscape as discussed in the Design and Access Statement **[APP-234]** and in the Framework Landscape and Ecological Management Plan **[APP-246].** Both documents include the Framework Landscape Masterplan illustrating this design.

One of the Scheme's design objectives is to ensure the design responds sensitively to residential properties in proximity to the Scheme regarding visual impact, noise, and lighting. This design approach is in accordance with paragraph 5.10.21 of NPS EN-1. To achieve this, the Scheme design retains existing vegetation as far as practicable and proposes carefully designed planting to provide screening. The design also incorporates buffers from residential properties to the solar PV infrastructure which are shown on the Framework Landscape Masterplan and the design commits to positioning noise emitting Field Stations 250 metres (m) or further from residential properties. The two Grid Connection Substations proposed as part of the Scheme are also greater than 250 m from residential properties. The Scheme is also not proposing any visible lighting from CCTV or artificial lighting for security purposes. These design principles are set out in the Outline Design Principles Statement **[APP-235].** The detailed design for the Scheme, which will need to be approved post consent prior to construction by East Riding of Yorkshire Council and North Yorkshire Council (the relevant local authorities), must be in accordance with the design principles set out in the Outline Design Principles Statement **[APP-235]** and this is secured by a requirement in Schedule 2 to the Draft Development Consent Order **[AS-008].**

The Government has identified through its energy policy, most recently in the Overarching National Policy Statement for Energy EN-1 and National Policy Statement for Renewable Energy EN-3, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's Statement of Need **[APP-232]**, this includes low carbon energy generation using solar technology. Developing the Scheme at its proposed size will therefore be an important contribution to meeting this need. As discussed in the Statement of Need **[APP-232]** the Applicant recognises that decentralised energy generation on roof tops has an important role to play in decarbonisation, however on its own, smaller scale solar, including rooftop solar, is not likely to deliver a sufficient total capacity at the required pace and at an affordable cost to meet the Government's targets.

The Applicant has set out its rationale for selecting the Solar PV Site in Chapter 3: Alternatives and Design Evolution within the Environmental Statement **[APP-055]**. This explains the stages

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				and the main considerations which have influenced the Applicant in how it has selected the land for the Scheme. For the Solar PV Site this has included seeking to avoid environmental and land use constraints and taking into consideration other criteria such as topography; field pattern and arrangement; land use conflict, as well as land availability. In accordance with NPS EN-1 paragraph 5.11.3 the Applicant considered the use of previously developed land and did not identify any available land within its area of search of an appropriate size to locate the Scheme. In accordance with NPS EN-1 paragraph 5.11.12 and NPS EN-3 paragraphs 2.10.29 the Applicant has taken a sequential approach to the use of agricultural land considering whether land of lower grade is available and suitable. Following the identification of an area of search derived from the point of connection at the National Grid Drax Substation the Applicant did not identify any alternative sites which would be of lower grade agricultural land (compared to the majority of the Order limits) that were available or considered suitable for the Scheme and its objectives. The Scheme incorporates fencing and security design measures which will mitigate against the risk of criminal activity. This includes internal facing closed circuit television (CCTV) systems which use infra-red technology avoiding the need for lighting. These will be installed around the perimeter of the operational areas of the Solar PV Site. These measures are described in Chapter 2: The Scheme of the Environmental Statement **[APP-054]**. As set out in Chapter 8: Ecology, ES Volume 1 **[APP-060]** the Scheme avoids and mitigates significant adverse effects on internationally, nationally and locally designated sites and other important ecological features such as protected species and habitats. This has been achieved through careful design informed by a design team with qualified ecologists and embedding appropriate mitigation measures during construction, operation and decommissioning phases, including appropriate buffers. In addition to protecting existing features of biodiversity value, the Applicant has also taken opportunities to maximise the enhancement of the biodiversity value of the Solar PV Site and other parts of the Scheme where relevant, including within field margins, undeveloped areas set aside for biodiversity enhancement, and in the land between and below solar PV infrastructure. This is explained in Section 5 of the Planning Statement **[APP-233]** and in the Framework LEMP **[APP-246]** and Design and Access Statement **[APP-234]** and illustrated on the landscape masterplan provided in both these documents. As a result, the Scheme is expected to deliver biodiversity net gain, and substantial improvement regarding habitat units due to the baseline of mostly agricultural fields. In relation to larger animals, there will be space between the fence and the field edge to provide space for larger animals such as deer to move around the edge of the site. The Applicant recognises that the potential for future environmental changes associated with the Scheme during construction, operation and decommissioning are currently a source of concern for local residents.

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				To address this concern, the Applicant has undertaken a comprehensive and robust Environmental Impact Assessment so that any likely significant effects of the Scheme can be identified and mitigated. Chapter 14: Human Health within the Environmental Statement **[APP-066]** assesses potential effects of the Scheme on health and wellbeing of local residents. The assessment takes a holistic approach to health and considers a wide range of health determinants which are relevant to quality of life and amenity. The assessment considers elements of the Scheme which could affect mental health (for example changes in landscape and visual amenity, noise, access to open space and employment) as well as physical health (for example associated with air pollution and access to healthcare facilities). No significant adverse effects are identified with regards to human health.
RR-247	Walton & Co (Walton & Co) on behalf of Mr Paul Taylor and Mrs Alison Taylor (Mr Paul Taylor and Mrs Alison Taylor)	Category 1 (Subsoil interest)	Introduction 1.1. We act on behalf of Mr and Mrs Taylor who occupy the property known as Sandwood House together with the surrounding land for recreational and business uses. The following comments are made in relation to the East Yorkshire Solar Farm Nationally Significant Infrastructure Project ("the Project") which was accepted by the Planning Inspectorate on 19th December 2023. 1.2. We wish to object to the Project on our clients' behalf and in order to assist the Inspectors at this early stage to set out, in summary, the very considerable concerns that we have in relation to the Project. Our comments predominantly relate specifically to Solar PV Areas 2e and 2f (as shown on Figure 3-2: Elements of the Site plan contained at page 23 of the Planning Statement). The in-combination effects of the development of these two fields, in our view, sways the planning balance in favour of removing parts of the development of these fields from the Project. 1.3. We make it clear at the outset that there is no in principle objection to this Project, nor do our clients have any objection to the development of the solar farms. Indeed, they fully understand the reason that there is a presumption in favour of such development given the essential need to combat climate change. That said, such principle cannot in our view override all and any detailed planning concerns which we briefly set out below. We should note that our clients do wish to partake in the Examination stage of the Project and wish to appear at any hearings relevant to their concerns and have asked us to give consideration to instructing Counsel. 1.4. We make these initial objections having regard to the appraisal set out in the Planning Statement EN010143 November 2023. The Planning Statement refers to both	**<u>Policy context</u>** In response to the points raised at paragraphs 1.3 and 1.4, the Application was submitted on 21 November 2023 prior to the newly designated NPS EN-1, NPS EN-3 and NPS EN-5 coming into force on 17 January 2024. As such, the Application was appraised in the Planning Statement against the 2011 and 2023 draft NPSs. An appraisal of the Scheme against the newly designated January 2024 suite of energy NPS and has been submitted at Deadline 1 of the Examination [Appendix A of EN0101/43/APP/8.18]. This demonstrates that the Scheme is in accordance with this updated policy and now introduces the classification of infrastructure that is "Critical National Priority" Solar development is classified as CNP and the Scheme is therefore CNP infrastructure. Paragraph 4.2.16 of NPS EN-1 sets out that CNP infrastructure is to be treated as if it has met any tests which are set out within the NPS or any other planning policy, which requires a clear outweighing of the harm, exceptionality or very special circumstances, as the starting point for the Secretary of States decision making. Paragraph 3.3.63 of NPS-EN-1 also states that the CNP for low carbon infrastructure will "in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy." This confirms that with respect to this policy test, that the bar is high, where the impacts of a CNP infrastructure scheme would be required to outweigh need and benefits overall in order for consent to be refused. Paragraph 4.1.3 of NPS EN-1 also specifies the presumption in favour of granting consent to applications for energy NSIPs that are identified as CNP infrastructure, due to the level and urgency of need for such infrastructure, "unless any more specific and relevant policies set out in the relevant NPSs clearly indicate that consent should be refused". Paragraph 4.1.7 of NPS EN-1 also adds that: "For projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects in all but the most exceptional cases." The environmental impacts of the Scheme, which have been assessed as reported in the ES **[APP-058 to APP-061, AS-014, APP-064 to APP-067, and AS016]** and discussed in the Planning Statement **[APP-232]**. demonstrate that overall, with the mitigation hierarchy being followed, and the mechanisms to secure this mitigation being implemented, the Scheme will have limited and localised residual significant adverse effects during its 40 year operation. These limited and localised effects are therefore outweighed by the significant national benefits that the Scheme will provide, as supported by the general presumption in favour of granting consent for CNP infrastructure set out in NPS EN-1 discussed above.

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			National Policy Statements ("NPS") designated in 2011 and draft NPS which were the subject of consultation in 2023. We note that since the acceptance of the application, the draft NPSs referred to in the Planning Statement came into force on 17 January 2024 and therefore the 2011 NPSs have been withdrawn. Unless stated otherwise, references to NPSs are to those now in force. 2. Good Design and Site Selection 2.1. The applicant cites NPS EN-1 which sets out the principles of good design that are applicable for all energy infrastructure. We agree that this guidance is entirely applicable in relation to this objection when taken in context to the particular impacts in this location. NPS EN-1 states: "Applying "good design" to energy projects should produce sustainable infrastructure sensitive to place, including impacts on heritage…" [our emphasis] 2.2. NPS EN-1 expects applicants to provide details in their application of how the design process was conducted and how the design has evolved and acknowledges that there may be opportunities for applicants to demonstrate good design in terms of siting relative to existing landscape character and land form. 2.3. NPS EN-3 advises upon the factors which influence site selection and design and discusses each in detail. These include: proximity of a site to dwellings, accessibility, public rights of way, security and lighting. Paragraph 2.10.73 onwards considers the impacts of solar PV development and includes landscape, visual and residential amenity, cultural heritage, construction traffic, noise and vibration. 2.4. Contrary to this guidance it appears that the applicant has not addressed site-specific issues in relation to our client's property, nor indeed wider issues in relation to impacts on landscape and public rights of way. This is noted from a comparison of the early engagement illustrative plans and the submitted proposal (see Appendix 1 of this representation). Despite our client writing to the applicant on numerous occasions to raise their concerns, the layout surrounding our client's property has not changed substantially. The same planting scheme appears to have been retained at the north of area 2f and the volume of panels increased in area 2e. 3. Landscape and Visual Impacts	**<u>Good Design and Site Selection</u>** The Scheme design is the result of an iterative design process which delivers the Scheme's functionality, the generation of a large amount of renewable electricity using single axis tracker solar technology, whilst addressing the local context and setting within which it is located. In accordance with NPS-EN1 the Applicant's design team has worked collaboratively to provide an integrated and responsive design which has been informed by the process of environmental impact assessment, statutory consultation and stakeholder engagement. As set out in the Design and Access Statement **[APP-234]** and in accordance with NPS EN-1 section 4.7 design objectives have guided the design response from an early stage to develop a good design that balances the need to maximise renewable energy generation from the Scheme, whilst minimising potential adverse impacts and providing mitigation and enhancement measures where practicable. This has resulted in a Scheme which, with the implementation of mitigation, avoids residual significant adverse effects in relation to designated landscapes; biodiversity sites; protected species or habitats; agricultural land; heritage assets; flood risk; water quality; access; and land uses within the local area. Impacts on the local area have therefore been minimised as far as practicable. The Applicant has set out its rationale for selecting the Solar PV Site in Chapter 3: Alternatives and Design Evolution within the Environmental Statement **[APP-055].** This explains the stages and the main considerations which have influenced the Applicant in how it has selected the land for the Scheme. For the Solar PV Site this has included seeking to avoid environmental and land use constraints and taking into consideration other criteria such as topography; field pattern and arrangement; land use conflict, as well as land availability. This approach accords with the site selection considerations identified in NPS EN-3. **<u>Landscape and visual impacts and residential amenity</u>** The Applicant acknowledges that the operation of the Scheme will result in residual significant adverse effects upon the local landscape character and a small number of visual receptors, as presented in the Landscape and Visual Amenity Assessment within the Environmental Statement **[AS-014].** However, the Applicant has carefully designed the Scheme to ensure landscape and visual impacts are minimised as far as practicable by proposing a comprehensive landscape and ecological design and increased connectivity and local access through the landscape as discussed in the Design and Access Statement **[APP-234]** and in the Framework Landscape and Ecological Management Plan (LEMP) **[APP-246].** Both documents include the Framework Landscape Masterplan illustrating the indicative Scheme design. A detailed Landscape and Ecological Management Plan will be prepared post consent which will need to be in substantial accordance with the Framework LEMP and approved by the East Riding of Yorkshire Council and North Yorkshire Council. One of the Scheme's design objectives is to ensure the design responds sensitively to residential properties in proximity to the Scheme regarding visual impact, noise, and lighting. This design approach is in accordance with paragraph 5.10.21 of NPS EN-1 and NPS EN-3. To achieve this, the Scheme design retains existing vegetation as far as practicable and proposes carefully designed planting to provide screening. The design also incorporates buffers from

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			3.1. Our client has instructed a landscape consultant and this representation is based upon his initial views. A full report is being prepared and will be submitted at the relevant stage of the examination process. 3.2. Paragraph 5.10.6 of NPS EN-1 advises that "projects need to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible." [our emphasis]. Paragraph 5.10.26 acknowledges that reducing the scale of a project can help to mitigate visual impacts. Whilst this may result in operational constraints and reduction of functions, there may be exceptional circumstances where mitigation could have a very significant benefit and warrant a small reduction in function. 3.3. NPS EN-3 advises upon how visual and landscape impacts should be dealt with through good design with reference to the requirements of NPS EN-1 and states: "Applicants should carry out a landscape and visual assessment and report it in the ES. Visualisations may be required to demonstrate the effects of a proposed solar farm on the setting of heritage assets and any nearby residential areas or viewpoints. 2.10.98 Applicants should follow the criteria for good design set out in Section 4.7 of EN-1 when developing projects and will be expected to direct considerable effort towards minimising the landscape and visual impact of solar PV arrays especially within nationally designated landscapes." 3.4. Our landscape consultant notes that there is no consideration of landscape receptors beyond a national and local character area scale. This fails to consider the more granular variations in landscape character, and associated value and susceptibility, likely to occur in the setting of local settlement. In particular, there is no consideration of the local landscape setting near to Sandwood House. The result is a deficient landscape assessment that does not transparently and accurately report likely variations in the significance of effects across the study area. 3.5. The local setting near to Sandwood House has a positive landscape character evident in its openness and distant views over large fields (see Appendix 2 of this Statement); surviving semi-natural and natural features including mature woodland,	residential properties to the solar PV infrastructure which are shown on the Framework Landscape Masterplan. The Applicant has designed location-specific buffers to mitigate for visual effects associated with the solar PV panels upon residential properties. In response to comments raised in paragraph 3.9, these vary depending on the local context hence the differences between other settlements and the properties along Spaldington Road. The design also commits to positioning noise emitting Field Stations 250 metres (m) or further from residential properties. The two Grid Connection Substations proposed as part of the Scheme are also greater than 250 m from residential properties. The Scheme is also not proposing any visible lighting from CCTV or artificial lighting for security purposes. These design principles are set out in the Outline Design Principles Statement **[APP-235].** The detailed design for the Scheme, which will need to be approved post consent prior to construction by East Riding of Yorkshire Council and North Yorkshire Council (the relevant local authorities), must be in accordance with the design principles set out in the Outline Design Principles Statement **[APP-235]** and this is secured by a requirement in Schedule 2 to the Draft Development Consent Order **[AS-008].** The landscape assessment presented in Chapter 10: Landscape and Visual Amenity [AS-014] has utilised the published East Riding of Yorkshire Landscape Character Assessment that has been produced as part of the evidence base for the East Riding of Yorkshire Council Local Plan. The LCA 5A Howden to Bubwith Farmland description within the East Riding of Yorkshire Landscape Character Assessment is considered to be representative of the landscape character around Spaldington. Within paragraph 10.5.32 [AS-014] the landscape value is considered to be low as a result of the presence of human elements (development), detracting features (overhead cables and industrial structures), no notable elements that are rare or of notable cultural heritage or historical association. It would not be a proportionate approach to produce finer grained LCA. The local setting in proximity to Sandwood House includes an arable landscape with some degraded field boundaries, medium distance views across fields with mature vegetation restricting longer distance views. There are industrial structures to the rear of Sandwood House which increase the sense of built development in the immediate area. There is a low cultural value associated with the area surrounding Sandwood House and there are no locally designated features or listed structures. The value of the landscape is consistent with the value of the landscape for LCA 5A Howden to Bubwith Farmland as a whole. The susceptibility to the Scheme is assessed to be low resulting in low sensitivity, see Table 10-11. Assessment of landscape effects – local [AS-014]. The impacts to the LCA are as set out above and landscape mitigation includes the enhancement of the existing hedgerow along Spaldington Road as set out in the Framework LEMP **[APP-246]** which includes other landscape enhancements. As set out in Chapter 10: Landscape and Visual Amenity **[AS-014]** Viewpoint 5: Sandwood House, Spaldington Road lies in close proximity to Sandwood House. Impacts on residential receptors at Viewpoint 5 are assessed at construction and operation year 1 to result in medium magnitude of impact and moderate adverse (significant) effect as a result of the visibility of the Scheme in views from gaps in the boundary hedgerow. It is acknowledged that there is the potential for views from upper storey windows from properties located along Spaldington Lane,

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			hedgerow and trees; cultural value associated with traditional rural development dating to the late 18th century (Sandwood House & Spaldington Grange), frequent drains and dykes associated with the historic agricultural development, and historic lanes surviving as rights of way (Featheredbed Lane); together with recreational value associated with local Public Rights of Way ("PRoW") and the promoted Howden20 walking route. 3.6. The local setting described above is consistent with the criteria for medium sensitivity landscape despite being assessed as 'low' in the wider consideration of Landscape Character Area 5b. 3.7. The applicant has not minimised harm to the landscape in this discrete area (Areas 2e and 2f). The Indicative Site Layout Plan (sheet 4) (see Appendix 3 of this submission) shows a small flower rich grassland strip to the south of our clients' property followed by the existing hedgerow and proposed perimeter fencing. This proposed mitigation is not considered 'reasonable' for the visual and landscape impacts in this area. The proposal's almost exclusive reliance on planting to reduce the impact on visual amenity fails to maintain, respect or retain long views and the general openness of the local landscape that is central to its character. 3.8. Proposed woodland planting to the immediate south of Spaldington Road will permanently change the current openness of the landscape, including long distance views from Spaldington Road and Sandwood House that extend over a substantial field to the mature tree-lined horizon at the south of parcel 2f. In addition, there is an absence of mitigation planting adjacent to SPALF18 and EASTB17, with open and urbanising views of perimeter fencing and solar panels likely to be experienced. The creation of grassland and small areas of woodland edge planting do little to mitigate this. 3.9. Furthermore, there is an inconsistent approach to mitigation near to existing properties and settlements. For example, there is generally a minimum 'one-field buffer' to Willitoft, Spaldington and Gribthorpe. No such buffer, or one of similar scale, has been provided near to Sandwood House and neighbouring properties on Spaldington Road. This is despite the Environmental Statement identifying visual receptors as being of the same sensitivity in these locations .	although the majority of these properties, including Sandwood House have mature vegetation within their gardens to the south of the properties which provide some intermittent filtering of views further south. It is acknowledged within Table 10-12. Viewpoint Assessment within Chapter 10: Landscape and Visual Amenity [AS-014] that the properties along Spaldington Lane, including Sandwood House would experience filtering of views. It is acknowledged that Sandwood House will experience intermittent filtering of views, although this would not result in any change to the assessed impacts for Viewpoint 5. Mitigation is proposed to the north boundary of Solar PV Area 2f to assist in reducing these assessed impacts. The extent of planting and buffer between the existing hedgerow which borders Spaldington Road has been increased as a result of feedback received during the Statutory Consultation Period. A buffer of species rich grassland at an approximate width of 18 m has resulted in the proposed native woodland planting being located further from the existing boundary hedgerow. This proposed native woodland planting is an approximate width of 10 m. This mitigation planting is shown within the Framework LEMP **[APP-246]** on the Framework Landscape Masterplan Sheet 6 of 11. The impact at this location for operation year 15 has been assessed to reduce to low magnitude of impact and minor adverse effect that is not significant. This is as a result of the growth of the mitigation planting and the assessment acknowledges that there will be a shortening to the view. A cross section illustrating the typical section of the landscape mitigation buffer to the south of Spaldington Road is provided within the Framework LEMP **[APP-246]** Indicative Landscape Sections Sheet 1 of 2. In response to the comments made regarding mitigation planting adjacent to SPALF18 and EATB17 in paragraph 3.8, a buffer of 15 m has been provided adjacent to PRoW SPALF18. This buffer includes proposed flower rich grassland and proposed woodland edge planting. Proposed mitigation for EASTB17, includes enhancement to the existing linear features (hedgerow and mature trees) and would include managing the hedgerow, increasing the width and species. As set out in the Framework LEMP **[APP-246]** boundary hedgerows will be managed to a height of between 2.5 m and 3.5 m. A species rich grassland buffer is also provided either side of the vegetation bounding Featherbed Lane. In response to comments raised in paragraph 3.10 regarding the mitigation proposed on the southern boundary of Solar PV 2e, which is to the north of the Sandwood Business Park and equestrian paddock, receptors within businesses generally have less of an appreciation of the landscape and taking into consideration their susceptibility to the Scheme would be assessed to be of low sensitivity. This therefore did not form part of the LVIA. The equestrian use to the south of Solar PV Area 2e is noted however it is understood by the Applicant to be a paddock where horses are kept and may be pastured or exercised rather than used like a bridleway where horse riders would be sensitive to changes in the landscape. In response to comments raised regarding impacts of glint and glare on residential amenity in paragraph 5.1, Chapter 16: Other Environmental Topics, ES Volume 1 **[APP-068]** and supporting Appendix 16-2 Glint and Glare

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			3.10. With regards to parcel 2e, proposed species-rich grassland and a hedgerow with trees will do little to mitigate the immediacy of the array to receptors adjoining its southern boundary within Sandwood Business Park and the neighbouring equestrian land-use. The assessment of effects fails to consider the elevated line of sight experienced by horse-riders and greater levels of visibility experienced above features such as hedgerows. Views of the array over such features will adversely affect the enjoyment of a rural-based recreational activity. 3.11. For the above reasons, the Project does not accord with the national policy set out in the NPS. As previously noted, our client will be submitting a full landscape response as part of the examination stage. 4. Impact on recreational routes 4.1. A significant number of PRoWs run through the application site, of particular importance is the Howden 20 route (see Appendix 4). The Howden 20 is a popular promoted recreational 20 mile circular walk of the countryside around the market town of Howden. The submitted landscape assessment find that users of the Howden 20 "will experience significant adverse effects" which by year 15 will be reduced to minor adverse as a result of "establishment of proposed mitigation, enhancement and replacement planting and the management of existing hedgerow". 4.2. Paragraph 2.10.43 of NPS EN-3 states: "Applicants are encouraged where possible to minimise the visual impacts of the development for those using existing public rights of way, considering the impacts this may have on any other visual amenities in the surrounding landscape.89" 4.3. Footnote 89 of NPS EN-3 acknowledges that "screening along public right-of-way networks to minimise the outlook into the Solar Park may, impact on the ability of users to appreciate the surrounding landscapes". 4.4. Parts of the Howden 20 route (and other PRoWs such as SPALF18 and EASTB17) are made up of open, medium to long distance views. The buffer provided to PROWs is inadequate and there will be a material change in the open setting of the footpaths, with open views across the wider field lost. No effort has been made to retain part of the open setting to the PRoWs which is central to their enjoyment and understanding of landscape character.	Assessment **[APP-122]** provides an assessment of glint and glare effects of the Scheme. It states that embedded mitigation, particularly the technology proposed, which is single axis tracker panels, is considered adequate to avoid likely significant effects on glint and glare. This results in no impacts anticipated on PRoW, residential, road or rail receptors as a result of solar reflections. **Impact on recreational routes** As detailed in the Design and Access Statement one of the Scheme's design objectives is to enhance, where practicable, the existing network of Public Rights of Way (PRoW) to improve accessibility (objective 7) and another objective is to respond sensitively to its proximity to PRoW with regard to visual impact, noise and lighting (objective 4). This design approach is in accordance with 5.10.21 and 5.11.30 of NPS EN-1 and paragraphs 2.10.42 to 2.10.44 of NPS EN-3. The Scheme design provides buffers where PRoW traverse through the Solar PV Site. Perimeter fencing is proposed to be installed a minimum distance of 20 m either side of the centre of the PRoW where solar infrastructure lies to both sides (creating a 40 m wide corridor between the fence lines), or 15 m if solar infrastructure is to one side only. There will be a further 5 m from the perimeter fence to the Solar PV panels. No closures or diversions to PRoWs are proposed as part of the Scheme design. Two Permissive Paths to enhance the current PRoW network are proposed as part of the Scheme. These routes will be available to the public during the operational life of the Scheme, as follows: a. A continuation of Bridleway SPALB08 which currently terminates at Johnsons Farm, where the Operations and Maintenance Hub will be situated. This will be a Permissive Path over which horse riders will be permitted to travel, running northbound for approximately 340 m until connecting with the second permissive route; and b. An eastbound route from footpath SPALF14 (north of Spaldington) parallel with Londesborough Drain to connect with the first Permissive Path, continuing eastwards to the edge of the Habitat Enhancement Area running for approximately 1.4 km. This Permissive Path will allow horse riding over the majority of the extent of the route. The section travelling westbound from where the two permissive routes meet will permit passage by foot only, being of approximately 250 m in length. These are shown on the Landscape Masterplan provided at Appendix A of the Framework LEMP **[APP-246]**. During construction, operation and decommissioning, no PRoW closures will be required. A Framework Public Rights of Way Management Plan **[APP-245]** submitted with the DCO Application, outlines how PRoW will be managed during construction, operation and decommissioning of the Scheme. The measures contained within this document (Section 3.7 **APP-245**) will help to ensure the PRoW in the local area remain open and are appropriately managed in terms of user safety and accessibility. The Framework Construction Environmental Management Plan **[APP-238]**, the Framework Operational Environmental Management Plan **[APP-239],** and Framework Decommissioning

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			4.5. The application proposes a partial diversion of the PRoW to the north east of our client's property (PRoW 10/04 – PRoW 10/05). It is not clear from the submitted plans however, the diversion corridor appears to propose to divert the PRoW into the parcel 2e. The enjoyment of this PRoW will be significantly impacted due to the change in character of part of the PRoW into a field of built form in the way of solar panels. 4.6. Further evidence in relation to the impacts upon the PRoWs, including the Howden 20, will be submitted as part of the full landscape response which will be submitted at the relevant examination stage. 5. Residential Amenity 5.1. Paragraph 2.10.27 of NPS EN-3 informs that the proximity of a site to dwellings is a factor which will influence site selection and design and states: "Utility-scale solar farms are large sites that may have a significant zone of visual influence. The two main impact issues that determine distances to sensitive receptors are therefore likely to be visual amenity and glint and glare. These are considered in Landscape, Visual and Residential Amenity (paragraphs 2.10.93-2.10.101) and Glint and Glare (paragraphs 2.10.102 – 2.10.106) impact sections" 5.2. As noted above, NPS EN-3 requires applicants to carry out a landscape and visual assessment and will be expected "direct considerable effort towards minimising the landscape and visual impact of solar PV arrays". 5.3. The initial findings of our landscape consultant are that the submitted landscape assessment makes inaccurate assumptions about residential views experienced from Sandwood House fails to identify receptors in the adjoining equestrian land to the west. The use of this land for equestrian purposes was consented under planning permission 20/02488/PLF and represents a rural-based recreation activity where the appreciation of the adjoining countryside is central to its enjoyment. 5.4. Open, long-distance views are experienced from the dwelling (and its adjoining equestrian land to the west), a sensitive receptor, the proposed woodland planting to the immediate south of Spaldington Road will permanently	Environmental Management Plan **[APP-239]** have been prepared which also explain the proposed management of PRoW (including diversions) and any PRoW mitigation during the construction, operation and decommissioning of the Scheme, as well as the implementation of permissive routes. Detailed management plans will need to be approved post consent prior to construction by the relevant local authorities. These detailed management plans must substantially accord with the framework management plans discussed above and this is secured by a requirement in Schedule 2 to the Draft Development Consent Order **[AS-008]**. **Construction impacts** Construction vehicle movements will be managed through a detailed Construction Traffic Management Plan (CTMP) which will be prepared post consent and will need to be in substantial accordance with the Framework CTMP [**APP-113].** The CTMP will focus on the management of construction traffic along the local highway network within the vicinity of the Site during the construction period of the works, in order to limit any potential disruptions and implications on the wider transport network as well as for the existing road users. As stated within Section 3.4.8 of the Framework CTMP and shown on Figure 13-5-4 of the Framework CTMP **[APP-113],** the only construction vehicles that will use Spaldington Road and deliver goods to Solar PV Areas 2e and 2f will be Tractor-Trailer vehicles. Details of construction traffic numbers are provided within Appendix 13-2 Traffic Flow Diagrams **[APP-110].** ATC 13 represents a location close to Solar PV Areas 2e and 2f on Spaldington Lane. Page 10 indicates a total of 0 two-way construction HGVs passing this location per day. Page 11 indicates a total of 20 two-way construction Tractor-Trailer movements passing this location per day. Standard environmental protection measures, as provided in the Framework CEMP [APP-238], will be implemented during the construction phase. This is secured by requirement 11 in Schedule 2 to the Draft DCO **[AS-008]**. The aim of the CEMP is to eliminate or reduce nuisance and environmental impacts and these will minimise disturbance to residential properties including residents of Sandwood House. **Cumulative Effects** The assessment of cumulative impacts of the Scheme with other existing and proposed energy developments as well as other developments in the locality is set out in chapters 6 – 16 of the Environmental Statement **[APP-058 to APP-061, AS-014, APP-064 to APP-067, and AS016]** and is summarised in Chapter 17: Cumulative Effects and Interactions of the Environmental Statement **[APP-069].** No new likely significant adverse effects are anticipated to arise from the Scheme when considered alongside those effects generated by nearby developments.

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change the current openness of the landscape, including long distance views from Spaldington Road and Sandwood House that extend over a substantial field to the mature tree-lined horizon at the south of parcel 2f.

5.5. We would strongly disagree with paragraph 10.6.8 of the Planning Statement which deals with the 'careful siting in the landscape' and states that "A wide margin is provided within Solar PV Area 2f, where a small number of properties currently have open views across the field." For the reasons set out above, the proposed landscaping is inefficient and does not minimise the impacts to the visual and residential amenity of Sandwood House.

5.6. The Planning Statement provides no further analysis on the impacts of this development on our client's property. Sandwood House is a 18th century farmhouse and the application does not consider the historic setting of our client's property. Our client's property is a sensitive receptor which ought to have been properly considered in the environmental impact statement.

6. Construction impacts

6.1. Our client's property is located within close proximity of 3 elements of the Project which will cause severe disruption and impact through the course of construction: 1. Spaldington Lane is identified as a Compound B Access Route (as shown on Appendix 13.5-4 of the ES) meaning that construction vehicles will pass the front of the property on a regular basis during construction; 2. Both fields to the north and south (areas 2e and 2f) of the property are proposed for the installation of the panels extremely close to the property. Despite the applicants assertion that a "wide margin" is provided between the residential receptor and the development; and 3. Land to the immediate west of the property is proposed for the laying of cable.

6.2. Whilst the application seeks to assess and address the individual impacts of noise, vibration and traffic, the location of our client's property directly in the middle of the above operations will result in a significant cumulative impact. We have seen no overall analysis of the impact of construction on our client's property.

7. Way forward

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			7.1. In order to remove our objections, our client would be satisfied with the removal of parts of the proposal within the immediate vicinity of our client's property in order to meet the concerns set out above. The application site occupies a substantial land holding and it is considered wholly possible for a more considered landscape strategy to be delivered that addresses the points outlined above while maintaining a similar capacity for solar power. 7.2. The reinstatement of historic field boundaries and woodland (as illustrated on historic Ordnance Survey mapping) would represent a more logical strategy of inform the scale and extent of buffers to both the north and south of Sandwood House. The reinstatement of historic field boundaries in those locations would provide a framework of primary mitigation embedded in the scale and siting of the proposal. This could, in turn, allow areas of open field to be retained alongside Spaldington Road, Howden 20, SPALF18 and EASTB17, while delivering a logical framework of landscape restoration.	
RR-134	Guy Bramley	Category 1 (Subsoil interest)	My quality of life will be destroyed with panels to three sides of my property and hundreds of acres to the north of my house facing south ie straight onto my property. Sheer hell. The Spaldington area is a very quiet rural area with nesting grey partridge and curlew/ a bleak unspoiled part of Yorkshire, soon to be destroyed. The roads in the area are not suitable for heavy industry or construction. I would also make you aware that several of these fields did not have archeological digs last autumn. I need access down Ings Lane at all times.	**Quality of Life** The Applicant recognises that the potential for future environmental changes associated with the Scheme during construction, operation and decommissioning are currently a source of concern for local residents. To address this concern, the Applicant has undertaken a comprehensive and robust Environmental Impact Assessment so that any likely significant effects of the Scheme can be identified and mitigated. Chapter 14: Human Health within the Environmental Statement **[APP-066]** assesses potential effects of the Scheme on health and wellbeing of local residents. The assessment takes a holistic approach to health and considers a wide range of health determinants which are relevant to quality of life and amenity. The assessment considers elements of the Scheme which could affect mental health (for example changes in landscape and visual amenity, noise, access to open space and employment) as well as physical health (for example associated with air pollution and access to healthcare facilities). No significant adverse effects are identified with regards to human health. **Ecology** Chapter 8: Ecology, ES Volume 1 **[APP-060]** presents the findings of an assessment of the likely significant effects of the Scheme on ecology. With mitigation measures in place, there are no residual significant adverse effects that have been identified during construction, operation or decommissioning of the Scheme. An area of habitat enhancement within the eastern portion of Solar PV Area 1e, adjacent to the River Foulness, will be left free of solar PV panels and other infrastructure as part of the Scheme design, and will provide permanent wet grassland habitat for birds that prefer such habitats during the non-breeding season (e.g., golden plover, curlew and lapwing). This has been included within the landscape design (as presented in the Framework LEMP **[APP-246]).**

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Archaeology
A programme of archaeological geophysical survey has been carried out for the Scheme. This is detailed within Chapter 7: Cultural Heritage, ES Volume **[APP-059].**

Transport
A full and detailed assessment of potential traffic and transport impacts from construction at sensitive receptors has been undertaken within Chapter 13: Transport and Access of the Environmental Statement **[APP-065].** The conclusions (reference to Section 13.7) indicate that significant adverse effects would only be expected in one location (B1228 between B1230 and Brind Lane junctions). No significant adverse effects would be expected at any other locations. Any impacts (including at the B1228 between B1230 and Brind Lane junctions) would be temporary and would be managed through the embedded mitigation measures.

Usage of single track roads: access routes have been tracked using industry standard Autotrack software, as provided in Appendix 13-5: Framework Construction Traffic Management Plan, Annex A: Proposed Access Layouts, Visibility Splays and Swept Paths within the Environmental Statement **[APP-114, APP-15, APP-116].** This has been done to ensure that movements can be made suitably and safely. Where issues were identified, carriageway widening and/or vegetation removal and associated traffic management to facilitate safe implementation would be introduced. The Framework Construction Traffic Management Plan **[APP-113]** provides full details of embedded mitigation measures that are proposed to prevent or reduce potential adverse effects associated with traffic on roads in the Spaldington area. Any large vehicles required for the construction of the Scheme will use defined routes to arrive at the compound locations, as described within Section 4 of the Framework Construction Traffic Management Plan **[APP-113].**

Construction vehicle movements will be managed through the Framework Construction Traffic Management Plan **[APP-133].** The document will focus on the management of construction traffic along the local highway network within the vicinity of the Site during the construction period of the works, in order to limit any potential disruptions and implications on the wider transport network as well as for the existing road users.

In order to minimise disruption to the local residents of Spaldington on Ings Lane, the Applicant is proposing to access Ings Lane via Access 8, which is at the easternmost terminus of Ings Lane, with construction vehicles travelling westbound in Ings Lane to enter Access 9. Details of the access arrangements referenced above are presented on maps within the appendices to the Framework Construction Traffic Management Plan **[APP-113].** Therefore, no construction vehicles will access the proposed sites in question via the village of Spaldington, minimising any interaction of construction vehicles with local residents.

The Applicant proposes to utilise banks person control to manage the access and egress of construction vehicles onto Ings Lane, with priority to be given to ahead movements on Ings Lane, rather than turns in and out of the site. Thus the ability for local residents to access Ings Lane will not be precluded by the proposed Scheme.

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RR-135	Guy Longbottom	Category 1 (Subsoil interest)	East Yorkshire Solar I have lived in [REDACTED] for 36 years and regard the areas in this planning application to be an important part of the environment we live in. I totally understand the farmland is privately owned but despite that it currently contributes greatly to our environment in its open natural views, its natural changing seasonal colours as land is cultivated, sown with new crops and harvested. Currently the land in the application produces around 9000 tonnes of food/ year which in current worldwide politics, war and climate effects should be a major consideration in this planning decision. In the last world war all the land in question [for some reason now deemed suitable for industrialisation] was drained and mechanised to grow crops for staple foods paid for by the government to establish food security -why is this now changed? It makes me feel vulnerable. Locally, surrounding our landscape are beautiful single tracked roads with wide natural verges which support a superb diverse range of species, which provide the community with our only open spaces apart from two public footpaths. A significant proportion are deemed as East Riding Verge Nature Reserve ref no. SE73/BO2.From the plans many of these are to be used for underground cabling and traffic management. I was informed of this intention only last week by post from Ardent consultants weeks after Boom's consultation had finished. This information should have been included in the consultation process. I have been to all three Boom evenings which they publicised as consultation events. I am keen on green energy and climate preservation. The first occasion I came away with an open mind and, as requested replied to them with comments. My main comments were a request to show consideration to property owners near Brind, Gribthorpe, Willitoft and Spaldington by removing areas of glass surrounding these communities and suggesting different access routes to construction traffic to ensure preservation of our local amenity. Attending the next two meetings I came away thinking that really there was little consultation going on -it was just a well-rehearsed means of jumping through the planning process. This has been confirmed by the final submission plan showing little change to the original.	**Agricultural Land** The Applicant acknowledges that agricultural land will be used for the Scheme however respectfully disagrees that this is valuable for agricultural production and will never recover. Agricultural land quality was a consideration of the Applicant's site selection process as described in Chapter 3: Alternatives and Design Evolution within the Environmental Statement **[APP-055].** The Scheme is located mostly on lower quality agricultural land, with the majority of the Scheme being on land not classed as Best and Most Versatile (BMV). For the Solar PV Site, 92.8% of the land used is non BMV land. The Applicant's discussions with farmers who farm areas of the Solar PV Site have also identified that this land is difficult to farm due to climatic factors and that this land is not always farmed to produce food for human consumption instead animal feed and for biomass purposes. In accordance with NPS EN-1 paragraph 5.11.3 the Applicant considered the use of previously developed land and did not identify any available land within its area of search of an appropriate size to locate the Scheme. In accordance with NPS EN-1 paragraph 5.11.12 the Applicant has taken a sequential approach to the use of agricultural land considering whether land of lower grade is available and suitable. Following the identification of an area of search derived from the point of connection at the National Grid Drax Substation the Applicant did not identify any alternative sites which would be of lower grade agricultural land (compared to the majority of the Order limits) that were available or considered suitable for the Scheme and its objectives. The vast majority of agricultural land within the Order limits would also be available for return to its existing agricultural use following decommissioning of the Scheme. Chapter 15: Soils and Agricultural Land within the Environmental Statement [**APP-067]** concludes that a very small amount (0.41 ha) of BMV Subgrade 3a agricultural land for tree planting would be permanently removed from agricultural use but would provide a permanent ecological benefit. In relation to non-BMV land, 8.97 ha of Subgrade 3b agricultural land would be permanently removed from agricultural use as a result of tree and hedge planting, and further 2 ha of Subgrade 3b agricultural land would be permanently removed as a result of the potential retention of the Grid Connection Substations and associated accesses. In addition, the conversion of arable land to grassland during the 40 year operational period has the potential to accrue improvement to soil function over a large area. **Ecology** As set out in Chapter 8: Ecology, ES Volume 1 **[APP-060] t**he Scheme avoids and mitigates significant adverse effects on internationally, nationally and locally designated sites and other important ecological features such as protected species and habitats. This has been achieved through careful design informed by a design team with qualified ecologists and embedding appropriate mitigation measures during construction, operation and decommissioning phases, including appropriate buffers.

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			In the last 10 years our local farmland in an approximate 10 mile radius has already lost large areas to Six Penny Wind Farm, Spaldington Wind Farm, North Howden urban extension of 2500 new houses. The remaining land if you look on a map is now going to be covered in black tilting glass. In addition, we have a R100 anaerobic digester at Spaldington whose distribution of digestate to farms is causing horrible verge and lane damage due to overweight use of tractor and tankers with again no consideration to anyone who lives in this area. The visual impact of the project I find intimidating. Despite planting a few hedges and trees the reality is miles of security fencing designed to keep people out, commercial security keep out signs, and security cameras and acres of black tilting glass on aluminium frames much higher than conventional systems on a scale not experienced in the UK. The project has already caused a lot of stress to people that regard this project area as home. The scale is frightening and no benefit to local people except already heavily subsidised farmers. Nobody knows who owns Boom or how secure their finances are. When speaking to so called Boom representatives at the consultation many turned out to be subcontract consultants unfamiliar with our local area. In conclusion I am in favour of green energy but in the right location. The proposed East Riding Solar Farm is just too large in area and the panels unusually tall. Little consideration has been given to people who live locally by the scheme designers and particularly by the farmers who own the land. Solar should go on buildings, redundant brown land already removed from agriculture before reducing even more food production by moving onto agricultural land. If this project goes ahead our area will be semi industrialised for the rest of most local people' s lifetimes. The construction phase due to our narrow roads will be a nightmare with the beauty I have mentioned destroyed. Any constructive suggestions by people who actually live here that have been put forward have generally been ignored by Boom power.	The assessment within Chapter 8: Ecology, ES Volume 1 [**APP-060]** includes consideration of site access locations and any areas where traffic routing for HGV or Abnormal Indivisible Loads (AIL) may ingress on verges close to ancient or veteran trees. During the development of the design, the tree constraints data has been considered in relation to the design and where there is potential for trees to be impacted by the design proposals further survey of these trees have been undertaken to accurately define the impacts that may occur and develop mitigation including altering the design to avoid features where practicable. The Site layout plan presented in Figure 2-3, ES Volume 3 **[APP-138]** allows for a buffer of 15m around all trees (where reduction/removal is not required to facilitate access and/or cabling works) and the design parameters allow for a minimum 15m buffer for individual veteran/ancient trees (increased as necessary following identification of root protection zones [RPZ], through survey data) and are included in the ES. In addition to protecting existing features of biodiversity value, the Applicant has also taken opportunities to maximise the enhancement of the biodiversity value of the Solar PV Site and other parts of the Scheme where relevant, including within field margins, undeveloped areas set aside for biodiversity enhancement, and in the land between and below Solar PV infrastructure. This is explained in Section 5 of the Planning Statement **[APP-233]** and in the Framework LEMP **[APP-246]** and Design and Access Statement **[APP-234]** and illustrated on the landscape masterplan provided in both these documents. As a result, the Scheme delivers biodiversity net gain, and substantial improvement regarding habitat units due to the baseline of mostly agricultural fields. **Landscape Impacts** The Applicant acknowledges that the operation of the Scheme will result in residual significant adverse effects upon the local landscape character and a small number of visual receptors, as presented in the Landscape and Visual Amenity Assessment within the Environmental Statement **[AS-014]**. However, the Applicant has carefully designed the Scheme to ensure landscape and visual impacts are minimised as far as practicable by proposing a comprehensive landscape and ecological design and increased connectivity and local access through the landscape as discussed in the Design and Access Statement **[APP-234]** and in the Framework Landscape and Ecological Management Plan **[APP-246].** Both documents include the Framework Landscape Masterplan illustrating this design. The assessment of cumulative impacts of the Scheme with other existing and proposed energy developments as well as other developments in the locality is set out in chapters 6 – 16 of the Environmental Statement **[APP-058 to APP-061, AS-014, APP-064 to APP-067, and AS016]** and is summarised in Chapter 17: Cumulative Effects and Interactions of the Environmental Statement **[APP-069].** No new likely significant adverse effects are anticipated to arise from the Scheme when considered alongside those effects generated by nearby developments. The Scheme is anticipated to have a significant beneficial effect upon the functional improvement of soil resources that would follow with the conversion of arable land to grassland when considered with the other solar farm proposals in the area. **Scale** The Government has identified through its energy policy, most recently in the Overarching National Policy Statement for Energy EN-1 and National Policy Statement for Renewable

Ref. No.	IP Name	Land Interest	Comments from Relevant Representations	Response to Relevant Representation
			Even our so called local involved farmers have demonstrated quite clearly that they have no regard at all for their neighbours living in close proximity to the black glass. They just want the maximum area to satisfy their greed. The way the project has been presented leaves one feeling intimidated by people who have no scruples about how they achieve their goal . Finally one important factor that does worry me is the effect of 3000 acres of black glass on climate change ,in hot weather anything black for example glass ,tarmac absorbs heat and is too hot to walk on, vegetation for example, grass or ,cereals is always cooler because unlike glass it has the ability to transpire so reducing temperature. The effect on the environment is similar to making our rural area into an industrial estate, the only difference is the roofs are lower and black in colour as opposed to modern industrial buildings being painted pale blue to blend into the surrounding sky. The highly visible security fencing further adds to the industrial vision we will be surrounded by calling the project the East Riding Solar Farm suggests a community project ,the community feels no involvement at all apart from feeling invaded and pushed over by organisations they know little about ,and feel completely unable to have any control in the area they call home.	Energy EN-3, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's Statement of Need **[APP-232]**, this includes low carbon energy generation using solar technology. Developing the Scheme at its proposed size will therefore be an important contribution to meeting this need. **Funding** The Applicant is committed to making a positive and significant impact on climate change and the achievement of the UK Government's aim for a fully decarbonised, reliable and lowcost power system and net zero emissions by 2050. The Boom Managing Director and team have been responsible in previous roles for constructing more than 700 MW of solar developments in the UK between 2015 and 2017 and developing more than 850 MW of solar projects, including the UK's first NSIP solar PV project, Cleve Hill, which was granted a Development Consent Order in 2020. A Funding Statement **[APP-022]** provides details on how the Scheme would be funded and the organisational structure of Boom. **Design** The Scheme design, including height of the panels, is the result of an iterative design process which delivers the Scheme's functionality, the generation of a large amount of renewable electricity using single axis tracker solar technology, whilst addressing the local context and setting within which it is located. The Applicant's design team has worked collaboratively to provide an integrated and responsive design which has been informed by the process of environmental impact assessment, statutory consultation and stakeholder engagement. As set out in the Design and Access Statement **[APP-234]** design objectives have guided the design response from an early stage to develop a good design that balances the need to maximise renewable energy generation from the Scheme, whilst minimising potential adverse impacts and providing mitigation and enhancement measures where practicable. This has resulted in a Scheme which, with the implementation of mitigation, avoids residual significant adverse effects in relation to designated landscapes; biodiversity sites; protected species or habitats; agricultural land; heritage assets; flood risk; water quality; access; and land uses within the Howden area. Impacts on the local area have therefore been minimised as far as practicable. The Government has identified through its energy policy, most recently in the Overarching National Policy Statement for Energy EN-1 and National Policy Statement for Renewable Energy EN-3, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's Statement of Need **[APP-232],** this includes low carbon energy generation using solar technology. Developing the Scheme at its proposed size will therefore be an important contribution to meeting this need. As discussed in the Statement of Need **[APP-232]** the Applicant recognises that decentralised energy generation on roof tops has an important role to play in decarbonisation, however on its own, smaller scale solar, including

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rooftop solar, is not likely to deliver a sufficient total capacity at the required pace and at an affordable cost to meet the Government's targets.

Consultation
The Applicant carried out three rounds of consultation during the pre-application period ahead of finalising its proposals for the Scheme.

At statutory and targeted consultations, a full suite of consultation documents was provided to aid stakeholders in their understanding of the Scheme. This included figures and plans of the Site Boundary, Site Elements and Scheme Location Plan, in addition to a brochure, which have outlined where the proposed Scheme, including the underground cabling, would be located.

The Applicant also encouraged contact with the project team during the statutory and targeted consultations via email, freephone and Freepost to answer any queries or questions which were not answered at consultation events or covered within the consultation material.

All responses received to the statutory consultation and the Applicant's response to these can be found in Appendix P in Consultation Report Appendices **[APP-041 to APP-045].** There have been changes made to the Scheme as a result of consultation or specific requests. The changes, as well as how these have been considered, are outlined in Section 4.7 and 7.8 of the Consultation Report **[APP-025].**

Construction
Construction vehicle movements will be managed through the Framework Construction Traffic Management Plan **[APP-113].** The document will focus on the management of construction traffic along the local highway network within the vicinity of the Site during the construction period of the works, in order to limit any potential disruptions and implications on the wider transport network as well as for the existing road users.

With regard to the condition of the roads, pre and post construction road condition surveys will be undertaken at identified locations in coordination with the relevant Local Highway Authority. In addition, the Applicant is currently engaging with East Riding of Yorkshire Council to refine passing place proposals, any updates will be entered into the examination once the proposals are deemed acceptable to East Riding of Yorkshire Council.

Climate Change
Chapter 6: Climate Change, ES Volume 1 **[APP-058]** provides an assessment of the Scheme on Climate Change. Regarding concerns over the effects of black solar panels, some studies suggest that solar farms may produce a cooling effect on land surface temperatures or otherwise cool completely overnight, making it unlikely for a heat island effect to occur (Xu et al 2024, Vervloesem et al 2022, Masson et al 2014, and Fthenakis and Yu 2013). It is acknowledged that other research has also found warmer temperatures over PV plants than wildlands (Barron-Gafford et al 2016) however, on balance this is not considered a material risk for the application proposal.

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RR-007	Alison Taylor	Category 1 (Subsoil interest)	I am very concerned about this project. I believe it is far too big and in the wrong place. It will cover 3500 acres of productive farmland and turn a rural landscape into an industrial one. There are many brownfield sites that would be more suitable as well as acres of roof space. This huge development will engulf 5 small villages. Our home and business for example will be squeezed in between two huge fields of panels (300 acres) to the north and south as well as a cable connection to the west. I am worried about the effect on our quality of life. We choose to live in the countryside to be away from the noise and stress of living in the city but with this the tranquillity of the area could be destroyed forever. 40 years is NOT temporary. Removing 3500 acres of productive farmland (and yes all the proposed fields are currently farmed) at a time when food security is paramount is nothing short of madness. The cumulative affect on the local landscape will be enormous. If this was a series of smaller applications instead of one huge one each would have to be dealt with separately and some or all could be refused on the grounds of cumulative affect. The roads all around the designated site are all single track roads bordered by ancient hedgerows and trees. The current roads could not support hundreds of heavy lorries without having a serious adverse effect on the local communities. The verges have our utilities beneath them. The proposed traffic management scheme with road closures and traffic lights will seriously disrupt the daily lives of residents for the whole of the construction period which we have been told could be up to two years. I am concerned about the prospect of noise and vibrations for the construction period and thereafter from the panels themselves.	**Scale** The Government has identified through its energy policy, most recently in the Overarching National Policy Statement for Energy EN-1 and National Policy Statement for Renewable Energy EN-3, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's Statement of Need **[APP-232],** this includes low carbon energy generation using solar technology. Developing the Scheme at its proposed size will therefore be an important contribution to meeting this need. **Site Selection** The Applicant has set out its rationale for selecting the Solar PV Site in Chapter 3: Alternatives and Design Evolution within the Environmental Statement **[APP-055].** This explains the stages and the main considerations which have influenced the Applicant in how it has selected the land for the Scheme. For the Solar PV Site this has included seeking to avoid environmental and land use constraints and taking into consideration other criteria such as topography; field pattern and arrangement; land use conflict, as well as land availability. In accordance with NPS EN-1 paragraph 5.11.3 and NPS EN-3 paragraph 2.10.29 the Applicant considered the use of previously developed land and did not identify any available land within its area of search of an appropriate size to locate the Scheme. In accordance with NPS EN-1 paragraph 5.11.12 and NPS EN-3 paragraphs 2.10.29 the Applicant has taken a sequential approach to the use of agricultural land considering whether land of lower grade is available and suitable. Following the identification of an area of search derived from the point of connection at the National Grid Drax Substation the Applicant did not identify any alternative sites which would be of lower grade agricultural land (compared to the majority of the Order limits) that were available or considered suitable for the Scheme and its objectives. The Government has identified through its energy policy, most recently in the Overarching National Policy Statement for Energy EN-1 and National Policy Statement for Renewable Energy EN-3, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's Statement of Need **[APP-232],** this includes low carbon energy generation using solar technology. Developing the Scheme at its proposed size will therefore be an important contribution to meeting this need. As discussed in the Statement of Need **[APP-232]** the Applicant recognises that decentralised energy generation on roof tops has an important role to play in decarbonisation, however on its own, smaller scale solar, including rooftop solar, is not likely to deliver a sufficient total capacity at the required pace and at an affordable cost to meet the Government's targets. **Quality of Life and Health** The Applicant recognises that the potential for future environmental changes associated with the Scheme during construction, operation and decommissioning are currently a source of concern for local residents. To address this concern, the Applicant has undertaken a comprehensive and robust Environmental Impact Assessment so that any likely significant effects of the Scheme can be identified and mitigated. Chapter 14: Human Health within the Environmental Statement **[APP-**

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			The panels are so close to our home we will be bound to hear any noise or activity. The lorry movements alone will cause serious disruption and we are very worried about the construction methods - will they be using piling for example? What about cameras and lighting at night? The local footpaths will be severely compromised by this development which is a huge shame as they are part of the Howden20 route which is enjoyed by many people from all over the area. Flooding is a concern. This year after the heaviest rain experienced for many years there is low level flooding throughout the designated site. Standing water on the fields has caused run off into gardens where it has never happened before. Parts of our garden have been under water for weeks. Compressing heavy clay soil and filling it with concrete will only make the situation far worse. I am very concerned about the wildlife in the area. We have deer, brown hares, foxes, badgers, barn owls, tawny owls, little owls, several species of bats, buzzards, red kites as well as many ground nesting birds such as curlew, lapwing and skylark all around our home. The area is abundant with wildlife and yet Boom Power's representatives informed myself and many others that there wasn't any wildlife on the designated fields. Putting up high impenetrable fencing all around the sites will mean that larger animals will have to travel further causing a greater risk of traffic accidents. Invasive fencing so close to homes is a massive worry. Our outlook across open fields will become an outlook over a vast power station. The buffer zone we have been offered is tiny and just consists of grassland - how is grass going to mask anything? Even if trees are planted they need to be mature. Boom told us that any trees planted would be growing in 15 years but that is of no help at all.	**066]** assesses potential effects of the Scheme on health and wellbeing of local residents. The assessment takes a holistic approach to health and considers a wide range of health determinants which are relevant to quality of life and amenity. The assessment considers elements of the Scheme which could affect mental health (for example changes in landscape and visual amenity, noise, access to open space and employment) as well as physical health (for example associated with air pollution and access to healthcare facilities). No significant adverse effects are identified with regards to human health. **Agricultural Land.** The Applicant acknowledges that agricultural land will be used for the Scheme however respectfully disagrees that this is valuable for agricultural production and will never recover. Agricultural land quality was a consideration of the Applicant's site selection process as described in Chapter 3: Alternatives and Design Evolution within the Environmental Statement **[APP-055].** The Scheme is located mostly on lower quality agricultural land, with the majority of the Scheme being on land not classed as Best and Most Versatile (BMV). For the Solar PV Site, 92.8% of the land used is non BMV land. The Applicant's discussions with farmers who farm areas of the Solar PV Site have also identified that this land is difficult to farm due to climatic factors and that this land is not always farmed to produce food for human consumption instead animal feed and for biomass purposes. In accordance with NPS EN-1 paragraph 5.11.3 the Applicant considered the use of previously developed land and did not identify any available land within its area of search of an appropriate size to locate the Scheme. The vast majority of agricultural land within the Order limits would be available for return to its existing agricultural use following decommissioning of the Scheme. Chapter 15: Soils and Agricultural Land within the Environmental Statement **[APP-067]** concludes that a very small amount (0.41 ha) of BMV Subgrade 3a agricultural land for tree planting would be permanently removed from agricultural use but would provide a permanent ecological benefit. In relation to non-BMV land, 8.97 ha of Subgrade 3b agricultural land would be permanently removed from agricultural use as a result of tree and hedge planting, and further 2 ha of Subgrade 3b agricultural land would be permanently removed as a result of the potential retention of the Grid Connection Substations and associated accesses. In addition, the conversion of arable land to grassland during the 40 year operational period has the potential to accrue improvement to soil function over a large area. **Landscape** The Applicant acknowledges that the operation of the Scheme will result in residual significant adverse effects upon the local landscape character and a small number of visual receptors, as presented in the Landscape and Visual Amenity Assessment within the Environmental Statement **[AS-014].** However, the Applicant has carefully designed the Scheme to ensure landscape and visual impacts are minimised as far as practicable by proposing a comprehensive landscape and ecological design and increased connectivity and local access through the landscape as discussed in the Design and Access Statement **[APP-234]** and in the Framework

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			There are concerns about criminality. The panels contain copper and other metals that are greatly lucrative to criminals. Could this mean that our peaceful rural area could be further affected by crime and the methods to prevent this could be even more detrimental such as higher chain link fencing instead of basic deer fencing? The fencing and cameras will be a huge invasion of our privacy because we live so close. And finally and by no means least I have great concerns abut the effect on both mine and my family's mental and physical health. We are already being put under mental stress with this hanging over us and that will only get worse. It is a scandal that ordinary people can be faced with something as enormous as this and yet feel entirely powerless. In conclusion I strongly object to this application on the grounds that it will have a huge detrimental effect on mine and my family's residential and visual amenity and our quality of life for all of the above reasons. I would be very grateful if you could take all of these points into consideration before making a decision.	Landscape and Ecological Management Plan **[APP-246].** Both documents include the Framework Landscape Masterplan illustrating this design. The assessment of cumulative impacts of the Scheme with other existing and proposed energy developments as well as other developments in the locality is set out in chapters 6 – 16 of the Environmental Statement **[APP-058 to APP-061, AS-014, APP-064 to APP-067, and AS016]** and is summarised in Chapter 17: Cumulative Effects and Interactions of the Environmental Statement **[APP-069].** No new likely significant adverse effects are anticipated to arise from the Scheme when considered alongside those effects generated by nearby developments. The Scheme is anticipated to have a significant beneficial effect upon the functional improvement of soil resources that would follow with the conversion of arable land to grassland when considered with the other solar farm proposals in the area. **Transport Impacts** A full and detailed assessment of potential traffic and transport impacts from construction at sensitive receptors has been undertaken within Chapter 13: Transport and Access of the Environmental Statement **[APP-065]**. The conclusions (reference to Section 13.7) indicated that significant adverse effects would only be expected in one location (B1228 between B1230 and Brind Lane junctions). No significant adverse effects would be expected at any other locations. Any impacts (including at the B1228 between B1230 and Brind Lane junctions) would be temporary and would be managed through the embedded mitigation measures. Construction vehicle movements will be managed through the Framework Construction Traffic Management Plan **[APP-133].** The Framework Construction Traffic Management Plan **[APP-133]** will inform a detailed Construction Traffic Management Plan that will be secured by a requirement in Schedule 2 of the draft DCO **[AS-008].** The document will focus on the management of construction traffic along the local highway network within the vicinity of the Site during the construction period of the works, in order to limit any potential disruptions and implications on the wider transport network as well as for the existing road users. With regard to the condition of the roads, pre and post construction road condition surveys will be undertaken at identified locations in coordination with the relevant Local Highway Authority. **<u>Utilities</u>** The comments regarding the utilities are noted. The Framework Construction Environmental Management Plan **[APP-238]** includes mitigation measures to avoid impacts on existing utility infrastructure above and below ground as a result of excavation and engineering operations, which include: • Locating the Scheme outside of utilities protected zones; • Identification of unknown utilities before excavation (for example by scanning using CAT and Genny); • Consultation and agreement of construction/demobilisation methods will be undertaken with utility asset owners prior to works commencing; and • Infrastructure that crosses the Scheme will be mapped and avoided through the design.

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The draft DCO **[AS-008]** includes protective provisions for the protection of utility assets. Pre and post construction road condition surveys will also be undertaken at identified locations as set out in the Framework CTMP **[APP-113]** which will need to be agreed by the Local Highway Authority.

Noise and Vibration

Noise and vibration during the construction phase and noise during the operational phase have been assessed in Chapter 11: Noise and Vibration of the Environmental Statement **[APP-063]**. Three assessment locations were selected at Spaldington (R11, R12 and R52) as representative of properties that would be worst-affected (shown in Figure 11-1 of the Environmental Statement **[APP-211]**). This allowed the worst-case noise and vibration effects to be identified at properties in Spaldington. The construction assessment includes noise from pilling during construction of PV modules, as detailed in Table 1 of Appendix 11-4: Construction and Operational Noise Assessment within the Environmental Statement **[APP-106]**.

Table 11-12 of Chapter 11: Noise and Vibration within the Environmental Statement **[APP-063]** identifies a worst-case highest construction noise level at Spaldington of 60 dB LAeq,T. This would be temporary when PV construction works are taking place in close proximity to Spaldington and not significant. Spaldington properties are not close enough to PV module locations that piling induced vibration would be perceptible. No construction or operational traffic would be routed through Spaldington.

During operation of the Scheme, the highest predicted noise level at Spaldington properties was 31 dB LAr,Tr. This includes a 3 dB penalty that accounts for acoustic features that may make noise more distinguishable. To put this level of noise into context, design guides for new residential properties require an internal noise level of 30 dB LAeq,8h for good sleeping conditions. As such, noise from the Scheme may be perceptible but would not be at a level to cause disturbance.

The Applicant has also committed to positioning noise emitting Field Stations 250 metres (m) or further from residential properties. The two Grid Connection Substations proposed as part of the Scheme are also greater than 250 m from residential properties. These design principles are set out in the Outline Design Principles Statement **[APP-235]**. The detailed design for the Scheme, which will need to be approved post consent prior to construction by the relevant local authorities, must be in accordance with the design principles set out in the Outline Design Principles Statement **[APP-235]** and this is secured by a requirement in Schedule 2 to the Draft Development Consent Order **[AS-008]**.

Public Rights of Way

Chapter 12: Socio-economics and Land Use within the Environmental Statement **[APP-064]** assesses effects of the Scheme on PRoWs. It does not find any evidence that footpaths will be severely compromised. During the construction phase and decommissioning phase, that effects on PRoWs will be negligible. During operation, a minor beneficial effect is expected.

During construction, no PRoW closures will be required. The PRoW will be buffered from the perimeter fencing, with fencing being installed a minimum distance of 20 m either side of the

Ref. No.	IP Name	Land Interest	Comments from Relevant Representations	Response to Relevant Representation

centre of the PRoW where solar infrastructure lies to both sides (creating a 40 m wide corridor between the fence lines), or 15 m if solar infrastructure is to one side only. There will be a further 5 m from the perimeter fence to the Solar PV panels. HDD will be used where the Grid Connection Corridor crosses the Rivers Ouse and Derwent and so the footpaths at these locations will be unaffected. The other PRoWs crossed by the Grid Connection Corridor and all PRoW which are crossed by the Interconnecting Cable Corridor would only be impacted during the short-term trenching and restoration operations. These PRoWs would remain open (likely managed through traffic management measures) although routes may be slightly diverted temporarily for a short period, for example moving from one side of a road to the other.

During operation, no closures or diversions to PRoWs are expected. Permissive Paths to enhance the current PRoW network will be provided as part of the Scheme.

During decommissioning there should be no need for any closures of PRoW. In a worst-case scenario, PRoW crossing the Grid Connection or Interconnecting Cable Corridor may be disrupted by traffic management or temporary diversions, but these will be short-term in duration.

A Framework Public Rights of Way Management Plan **[APP-245]** submitted with the DCO Application, outlines how Public Rights of Way (PRoW) will be managed during construction and operation of the Scheme. The measures contained within this document (Section 3.7) will help to ensure the operation of PRoW in the local area in terms of user safety and accessibility.

The Framework Construction Environmental Management Plan **[APP-238]**, the Framework Operational Environmental Management Plan **[APP-239],** and Framework Decommissioning Environmental Management Plan **[APP-239]** have been prepared which explain the proposed management of PRoW (including diversions) and any PRoW mitigation during the construction, operation and decommissioning of the Scheme, as well as the implementation of permissive routes. Detailed management plans will need to be approved post consent prior to construction by the relevant local authorities. These detailed management plans must substantially accord with the framework management plans and this is secured by a requirement in Schedule 2 to the Draft Development Consent Order **[AS-008]**.

Flood Risk

A Flood Risk Assessment **[APP-096]**, **[APP-097]** has been produced for the Scheme and considers risk both to, and arising from, the Scheme. This includes both the Solar PV Site and for the Grid Connection Corridor. As part of the Flood Risk Assessment, mitigation is proposed to manage the potential impacts of flood risk so that the development does not increase or exacerbate flood risk to others. This mitigation has been informed by site-specific hydraulic modelling which takes into account climate change with respect to the lifetime of the development.

A Framework Surface Water Drainage Strategy **[APP-098]** has also been produced for the Scheme which aims to manage surface water from the Scheme. This strategy incorporates Sustainable Drainage Systems (SuDS) to manage surface water from the Solar PV Site so that the Scheme remains safe throughout its lifetime and does not increase flood risk to others.

Ecology

Ref. No.	IP Name	Land Interest	Comments from Relevant Representations	Response to Relevant Representation

As set out in Chapter 8: Ecology, ES Volume 1 **[APP-060]** the Scheme avoids and mitigates significant adverse effects on internationally, nationally and locally designated sites and other important ecological features such as protected species and habitats. This has been achieved through careful design informed by a design team with qualified ecologists and embedding appropriate mitigation measures during construction, operation and decommissioning phases, including appropriate buffers.

In addition to protecting existing features of biodiversity value, the Applicant has also taken opportunities to maximise the enhancement of the biodiversity value of the Solar PV Site and other parts of the Scheme where relevant, including within field margins, undeveloped areas set aside for biodiversity enhancement, and in the land between and below solar PV infrastructure. This is explained in Section 5 of the Planning Statement **[APP-233]** and in the Framework LEMP **[APP-246]** and Design and Access Statement **[APP-234]** and illustrated on the landscape masterplan provided in both these documents. As a result, the Scheme delivers biodiversity net gain, and substantial improvement regarding habitat units due to the baseline of mostly agricultural fields.

In relation to larger animals, there will be space between the fence and the field edge to provide space for larger animals such as deer to move around the edge of the site.

During the development of the design, the tree constraints data has been considered in relation to the design and where there is potential for trees to be impacted by the design proposals further survey of these trees have been undertaken to accurately define the impacts that may occur and develop mitigation including altering the design to avoid features where practicable. The Site layout plan presented in Figure 2-3, ES Volume 3 **[APP-138]** allows for a buffer of 15m around all trees (where reduction/removal is not required to facilitate access and/or cabling works) and the design parameters allow for a minimum 15m buffer for individual veteran/ancient trees (increased as necessary following identification of root protection zones [RPZ], through survey data) and are included in the ES.

Buffers

Details of the proposed screening and buffers including existing vegetation to be retained and proposed planting are provided in the Framework Landscape and Ecological Management Plan **[APP-246]** and illustrated on the Framework Landscape Masterplan included as Appendix A of the Framework Landscape and Ecological Management Plan **[APP-246]** and Section 5.4 of the DAS **[APP-234].** Existing hedgerows will be retained as far as practicable. Buffers of grassland, native scrub, woodland and traditional orchard will be created around the edge of the Solar PV Areas and other larger areas of grassland will be created, which will offer habitat for wildlife. Section 6 of the Framework Landscape and Ecological Management Plan **[APP-246]** also discusses the long term management and maintenance of proposed planting. This explains that opportunities for planting of more mature stock, for example, ready hedges and larger specimen trees will also be explored with landowners, targeting this to mitigate effects on the most sensitive receptors at the earlier opportunity such as during construction.

Safety and Security

The Scheme incorporates fencing and security design measures which will mitigate against the risk of criminal activity. This includes internal facing closed circuit television (CCTV) systems

Ref. No.	IP Name	Land Interest	Comments from Relevant Representations	Response to Relevant Representation
				which use infra-red technology avoiding the need for lighting. These will be installed around the perimeter of the operational areas of the Solar PV Site. These measures are described in Chapter 2: The Scheme of the Environmental Statement **[APP-054]**. One of the Scheme's design objectives is to ensure the design responds sensitively to residential properties in proximity to the Scheme regarding visual impact, noise, and lighting. This design approach is in accordance with paragraph 5.10.21 of NPS EN-1. To achieve this, the Scheme design retains existing vegetation as far as practicable and proposes carefully designed planting to provide screening. The design also incorporates buffers from residential properties to the solar PV infrastructure which are shown on the Framework Landscape Masterplan and the design commits to positioning noise emitting Field Stations 250 metres (m) or further from residential properties. The two Grid Connection Substations proposed as part of the Scheme are also greater than 250 m from residential properties. The Scheme is also not proposing any visible lighting from CCTV or artificial lighting for security purposes. These design principles are set out in the Outline Design Principles Statement **[APP-235]**. The detailed design for the Scheme, which will need to be approved post consent prior to construction by East Riding of Yorkshire Council and North Yorkshire Council (the relevant local authorities), must be in accordance with the design principles set out in the Outline Design Principles Statement **[APP-235]** and this is secured by a requirement in Schedule 2 to the Draft Development Consent Order **[AS-008]**.

2.6 Public Comments

Soils and Agricultural Land

Table 2-21. Applicant's Responses to Public Relevant Representations relating to Soils and Agricultural Land

Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
RR-003, RR-004, RR-008, RR-011 RR-012, RR-019 RR-023, RR-024 RR-025, RR-027 RR-030, RR-034 RR-037, RR-040 RR-046, RR-050 RR-053, RR-055 RR-056, RR-057 RR-060, RR-063 RR-066, RR-068 RR-072, RR-076 RR-076, RR-079 RR-080, RR-081 RR-083, RR-086 RR-091, RR-093 RR-098, RR-104 RR-105, RR-108 RR-110, RR-111 RR-113, RR-122 RR-123, RR-128 RR-129, RR-131 RR-132, RR-138 RR-140, RR-141 RR-144, RR-145 RR-152, RR-156 RR-157, RR-158 RR-159, RR-160 RR-164, RR-166 RR-170, RR-175 RR-177, RR-178 RR-180, RR-183 RR-185, RR-186 RR-187, RR-188 RR-190, RR-196 RR-197, RR-200 RR-202, RR-204 RR-205, RR-210 RR-211, RR-214 RR-215, RR-216	Concerns about the loss of high-quality agricultural land being used for the Scheme, including after its decommission. Concerns about the impact on food production and food security – the Scheme could increase food prices and the reliance on imported food.	The Applicant acknowledges that agricultural land will be used for the Scheme however respectfully disagrees that this is valuable for agricultural production and will never recover. Agricultural land quality was a consideration of the Applicant's site selection process as described in Chapter 3: Alternatives and Design Evolution, ES Volume 1 **[APP-055]**. The Scheme is located mostly on lower quality agricultural land, with the majority of the Scheme being on land not classed as Best and BMV. For the Solar PV Site, 92.8% of the land used is non BMV land. The Applicant's discussions with farmers who farm areas of the Solar PV Site have also identified that this land is difficult to farm due to climatic factors and that this land is not always farmed to produce food for human consumption instead animal feed and for biomass purposes. In accordance with NPS EN-1 paragraph 5.11.3 and NPS EN-3 paragraph 2.10.29 the Applicant considered the use of previously developed land and did not identify any available land within its area of search of an appropriate size to locate the Scheme. In accordance with NPS EN-1 paragraph 5.11.12 and NPS EN-3 paragraphs 2.10.29 to 2.10.34 the Applicant has taken a sequential approach to the use of agricultural land considering whether land of lower grade is available and suitable. Following the identification of an area of search derived from the point of connection at the National Grid Drax Substation the Applicant did not identify any alternative sites which would be of lower grade agricultural land (compared to the majority of the Order limits) that were available or considered suitable for the Scheme and its objectives. The vast majority of agricultural land within the Order limits would also be available for return to its existing agricultural use following decommissioning of the Scheme. Chapter 15: Soils and Agricultural Land within the ES **[APP-067]** concludes that a very small amount (0.41 ha) of BMV Subgrade 3a agricultural land for tree planting would be permanently removed from agricultural use but would provide a permanent ecological benefit. In relation to non-BMV land, 8.97 ha of Subgrade 3b agricultural land would be permanently removed from agricultural use as a result of tree and hedge planting, and further 2 ha of Subgrade 3b agricultural land would be permanently removed as a result of the potential retention of the Grid Connection Substations and associated accesses. In addition, the conversion of arable land to grassland during the 40 year operational period has the potential to accrue improvement to soil function over a large area.

Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
RR-222, RR-223, RR-225, RR-226 RR-227, RR-231 RR-232, RR-233 RR-234, RR-236 RR-237, RR-240 RR-241, RR-242 RR-245, RR-251 RR-253, RR-254 RR-257, RR-259 RR-263, RR-273 RR-274, RR-275 RR-276, RR-277 RR-279, RR-286 RR-291, RR-292 RR-294, RR-300 RR-303, RR-305 RR-305, RR-306 RR-309, RR-312 RR-315, RR-316 RR-324, RR-326 RR-333, RR-338 RR-339, RR-343 RR-345, RR-348 RR-350, RR-355 RR-357, RR-358 RR-359, RR-364 RR-365, RR-368 RR-374, RR-375		
RR-048	Concerns that construction machinery will negatively impact clay soils.	Prior to the start of construction, a Soil Management Plan (SMP) will be prepared (secured through DCO Requirement 15) following the guidance in the Defra (2009) Construction Code of Practice for the Sustainable Use of Soils on Construction Sites and other relevant documents such as The Institute of Quarrying's Good Practice Guide for Handling Soils in Mineral Workings and the British Society of Soil Science Guidance Note – Benefiting from Soil Management in Development and Construction. This will substantially accord with the Framework Soil Management Plan **[APP-241].** Further measures to protect soil resources are identified within the Framework CEMP **[APP-238].** A detailed CEMP will be provided as required by requirement 11 of the Draft DCO **[AS-008]**.
RR-108, RR-214, RR-250, RR-285	Concerns whether the land is suitable for grazing with the panels overhead.	The Applicant commissioned an independent consultant to review the feasibility of sheep grazing on the grassland beneath solar panels, which has shown it is feasible for sheep to graze on the land. More detail is contained within the Grazing Feasibility Study, Appendix 2-1, ES Volume 2 **[APP-071].** With regard to weed management, grazing by sheep is the Applicant's preferred option for the management of the grassland created within the solar farm. Should grazing not be possible in some or all areas of the Solar PV Site, grassland will instead be managed by mowing as secured in the Framework OEMP **[APP-23]** which is secured by Requirement 18 in the Draft DCO **[AS-008].** The flock would be of a suitable size for the land available, rotated as required to ensure that no areas were over-grazed and that the land being currently grazed was sufficiently dry to support them thereby avoiding potential damage to soil structure.

Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
		The provision of shade within animal husbandry has recognised welfare benefits. The Applicant is engaged with farmers who are directly impacted by the Scheme. Wool would represent a minor product of sheep farming. As grazing achieves an essential maintenance function (maintaining the grass at a low level) without the need for/cost of machinery, it is possible for solar farms to use less agriculturally productive breeds (such as heritage breeds) and to graze at low densities. The agricultural business model for grazing would be around the provision of vegetation management services in combination with the sale of fleece, meat or other products. The current landowners may not have sheep husbandry skills, but these can be developed, or other shepherds may wish to rent the land to keep and expand their own sheep enterprises. Sheep grazing can help to maintain the land in agricultural use and help to diversify farming in the area adding much needed security for farmers during challenging economic times. Sheep grazing on solar PV facilities is successfully used in the UK and carries with it multiple benefits such as soil health improvement and biodiversity enhancement. Sheep can move safely between and under the solar PV panels, and shelter under them from sun or rain. It is noted that the use of single axis tracker panels is not yet typical in the UK, however it is known from schemes elsewhere in the world (e.g., Australia and the USA) that the use of tracker technology does not influence grazing. The panels would be at a minimum height above ground level of approximately 1 m at maximum tilt with greater clearance during the rest of the day. Therefore, grazing will not be limited by the panels themselves. The Framework LEMP **[APP-246]** (secured in by Requirement 6 in Schedule 2 of the Draft DCO **[AS-008])** includes consideration of grazing densities to avoid overgrazing and to achieve ecological enhancement under the solar PV panels.
RR-073	Request to use an independent 'Soil Sampling' programme to validate claims of the use of low quality agricultural land for the Scheme.	A soil and Agricultural Land Classification (ALC) survey have been undertaken within the Solar PV Site and Ecology Mitigation Area by experienced soil specialists (Land Research Associates, LRA). The resultant Soil and ALC Survey Report is included as Appendix 15-3, ES Volume 2 **[APP-118].** The Soil Survey Methodology has been agreed with Natural England, ERYC and North Yorkshire Council.

Construction

Table 2-22. Applicant's Responses to Public Relevant Representations relating to Construction

IP Name	Comments from Relevant Representations	Response to Relevant Representation
RR-019, RR-023 RR-098, RR-152 RR-176, RR-226	Concerns around piling, specifically that it would be difficult, if not impossible to remove the piled structures, leaving the land unusable for agricultural purposes in the future. Concerns around digging of underground channels for cabling.	As described in Chapter 2: The Scheme of the ES **[APP-054]**, the solar PV panels will be attached to the PV mounting structures – metal poles driven directly into the ground. At decommissioning stage, the ground-driven poles will be extracted, and the land returned to its original use. Trenches will be dug to lay the buried cables, as described in Chapter 2: The Scheme of the ES **[APP-054].** This is a temporary activity, and the trenches will be backfilled, allowing arable farming to continue in these areas during operation of the Scheme. Further details on cable installation are contained with the Framework CEMP **[APP-238].** A detailed CEMP will be provided as required by requirement 11 of the Draft DCO **[AS-008]**. As noted in the Framework DEMP, the cabling may be removed following decommissioning of the Scheme. This would not require the trench to be reopened along its full length; the cables can be pulled back through from discrete openings.
RR-029, RR-034 RR-049, RR-055 RR-098, RR-125 RR-127, RR-138 RR-157, RR-158 RR-183, RR-200 RR-217, RR-246 RR-258, RR-260 RR-264, RR-291 RR-329, RR-333 RR-362, RR-368	Concerns for the noise levels resulting from construction activities for a prolonged period and disruptive impact this would have to local residents. Impacts on local horse riders and stress caused to horses.	Noise and vibration during the construction phase and noise during the operational phase have been assessed in Chapter 11: Noise and Vibration of the ES **[APP-063]**. The construction assessment includes noise from pilling during construction of PV modules, as detailed in Table 1 of Appendix 11-4: Construction and Operational Noise Assessment within the ES **[APP-106]**. The onsite construction activity is phased and will not occur continually at many receptors throughout the full construction phase duration; as solar PV is installed in one field, the Contractors will move onto the next field. The Applicant has also committed to positioning noise emitting Field Stations 250 metres (m) or further from residential properties. The two Grid Connection Substations proposed as part of the Scheme are also greater than 250 m from residential properties. These design principles are set out in the Outline Design Principles Statement **[APP-235].** The detailed design for the Scheme, which will need to be approved post consent prior to construction by the relevant local authorities, must be in accordance with the design principles set out in the Outline Design Principles Statement **[APP-235]** and this is secured by a requirement in Schedule 2 to the Draft DCO **[AS-008].** Noise generated by the construction, operational, and decommissioning phases of the Scheme will only affect PRoW users for limited periods of time when they are near a noise source. It is acknowledged that short-term exposure to noise can cause disturbance to PRoW users and result in adverse noise effects. Horses may be startled by short high noise events. However, given the linear nature of PRoW and the transient usage of a PRoW, it is considered that the range of noise impacts along them would form the ambient noise environment, and, it is not considered that there would be a material change in the experience of using the PRoW as a whole as a result of noise emissions from the Scheme, which could affect PRoW users' health or quality of life. In accordance with the Noise Policy Statement for England (NPSE), all reasonable steps to minimise the effects of noise on PRoW users will be taken during the construction, operational and decommissioning phases of the Scheme. These measures are set out in the Framework CEMP **[APP-238]**, Framework DEMP [APP-240], and the Framework OEMP **[APP-239]** all of which are secured in Schedule 2 of the Draft DCO **[AS-008]**. During operation, Noise from a solar farm is low and continuous and unlikely to cause disturbance in the long-term to horses.
RR-248	Concerns over the general negative ecological impact as a result of construction.	Chapter 8: Ecology, ES Volume 1 **[APP-060]** provides a summary of the magnitude of impacts and likely significance of environmental effects on ecological features during the construction of the Scheme. The assessment of effects on important ecological features has concluded that the construction, operation and decommissioning phases of the Scheme are unlikely to result in significant adverse effects for the majority of the important species, habitats and designated sites considered. Where significant adverse effects have been identified appropriate mitigation has been proposed and therefore residual effects are not significant.

IP Name	Comments from Relevant Representations	Response to Relevant Representation
		Standard environmental protection measures, as provided in the Framework CEMP **[APP-238]**, will be implemented during the construction phase. This is secured by requirement 11 in Schedule 2 to the Draft DCO **[AS-008]**.
RR-084, RR-116	Concerns on the long construction period	Construction of the Grid Connection Cables is anticipated to require 12 months, whereas construction of the solar farm will require an estimated 24 months, with operation therefore anticipated to commence in 2027. The construction period could be of longer duration however these timings have been used within the ES where they allow for worst-case assumptions in the technical assessments. Standard environmental protection measures, as provided in the Framework CEMP **[APP-238]**, will be implemented during the construction phase. This is secured by requirement 11 in Schedule 2 to the Draft DCO **[AS-008]**. The aim of the CEMP is to eliminate or reduce nuisance and environmental impacts from issues such as: a. Use of land for temporary laydown areas, accommodation, etc.; b. Construction traffic (including parking and access requirements) and changes to access and temporary road or footpath closure (if required); c. Noise and vibration; d. Utilities diversion; e. Dust generation; f. Handling of soil resources; g. Spillages of oil and other chemicals; h. Run off and drainage; and i. Waste generation.
RR-170	Concerns over the amount of concrete used during construction.	Section 16.7 of Chapter 16: Other Environmental Topics **[AS-016]** assesses the likely impacts and effects on material assets and waste resulting from the Scheme, including the use of concrete. No significant effects are anticipated.
RR-057	Request for compensation during construction period for the negative impact to local residents.	During the construction of the Scheme, there is the potential for significant adverse residual effects on several visual receptors. Although significant, most of these impacts will be temporary, due to the transient nature of the construction works. Additionally, there is the potential for significant adverse transport effects on Link 15 (B1228 between B1230 and Brind Lane junctions) as a result of a 6% increase in construction traffic. There is also potential for significant adverse effects at three residential receptors (R43, R45, R46) due to temporary noise emissions during the evening or night from possible HDD activities, should these not be able to be scheduled for daytime hours for whatever reason. These effects are considered unlikely to occur, but the assessment accounts for a worst-case scenario. Standard environmental protection measures, as provided in the Framework CEMP **[APP-238]**, will be implemented during the construction phase. This is secured by requirement 11 in Schedule 2 to the Draft DCO **[AS-008]**. The Applicant is exploring the use of a community benefit fund as part of the Scheme and aims to work with local organisations that will best spend the money to support the community. During Statutory Consultation, responses were sought on causes which the fund might support. There may be opportunities to fund projects which have a specific focus

IP Name	Comments from Relevant Representations	Response to Relevant Representation
		on education or skills, or which inform young people, workers, local residents and visitors about the Scheme more generally. The criteria for the allocation of funding has not yet been set and the Applicant welcomes these suggestions.
RR-029, RR-040	Concern regarding the impact on existing utilities including underground water supplies and pipelines during construction.	The Framework CEMP **[APP-238]** includes mitigation measures to avoid impacts on existing utility infrastructure above and below ground as a result of excavation and engineering operations, which include: e. Locating the Scheme outside of utilities protected zones; f. Identification of unknown utilities before excavation; g. Consultation and agreement of construction/demobilisation methods will be undertaken with utility asset owners prior to works commencing; and h. Infrastructure that crosses the Scheme will be mapped and avoided through the design. The Draft DCO **[AS-008]** includes protective provisions for the protection of utility assets. Pre and post construction road condition surveys will also be undertaken at identified locations in consultation with the LHA.

Consultation and Engagement

Table 2-23. Applicant's Responses to Public Relevant Representations relating to Consultation and Engagement

Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
RR-144, RR164 RR-170	Concern that there has been a lack of communication from the outset from the Applicant or local elected representatives about the proposals. Respondents state they only learnt about the Scheme through informal communications from locals.	The Applicant carried out three rounds of consultation during the pre-application period ahead of finalising its proposals for the Scheme. At statutory and targeted consultations, a full suite of consultation documents was provided to aid stakeholders in their understanding of the Scheme. This included figures and plans of the Site Boundary, Site Elements and Scheme Location Plan, in addition to a brochure, which outlined where the proposed Scheme, including the underground cabling, would be located. The Applicant also encouraged contact with the project team during the statutory and targeted consultations via email, freephone and Freepost to answer any queries or questions which were not answered at consultation events or covered within the consultation material. All responses received to the statutory consultation and the Applicant's response to these can be found in Appendix P in Consultation Report Appendices **[APP-041 to APP-045].**
RR-226, RR-164 RR-357, RR-144 RR-056, RR-200 RR-298, RR-034	Concern that consultation processes have been inadequate and did not engage everyone, especially locals with adjacent land to the Scheme Concerns that this had the aim of minimising objections. Concern that the early consultations only consulted Interested Parties to the minimum for the purpose of the application. Concern that changes have been made without suitable consultation.	The Applicant carried out three rounds of consultation during the pre-application period ahead of finalising its proposals for the Scheme. At statutory and targeted consultations, a full suite of consultation documents was provided to aid stakeholders in their understanding of the Scheme. This included figures and plans of the Site Boundary, Site Elements and Scheme Location Plan, in addition to a brochure, which outlined where the proposed Scheme, including the underground cabling, would be located. The Applicant also encouraged contact with the project team during the statutory and targeted consultations via email, freephone and Freepost to answer any queries or questions which were not answered at consultation events or covered within the consultation material. All responses received to the statutory consultation and the Applicant's response to these can be found in Appendix P in Consultation Report Appendices **[APP-041 to APP-045].** There have been changes made to the Scheme as a result of consultation or specific requests. The changes, as well as how these have been considered, are outlined in Section 4.7 and 7.8 of the Consultation Report **[APP-025]**.
RR-226, RR-357 RR-056, RR-029 RR-140, RR-056	Concern that the maps produced for consultations and for the DCO application were inaccurate and misleading. With particular references to homes not been showing correctly on the mapping. Concern that consultation maps were produced last minute and are out of date, with properties left off the map impacted by the proposals, such as in fields 1G, 1H and 1E. In particular, concern this shows a lack of research and understanding of local issues.	Due to scale, not all properties or village names may have been visible on some maps used during consultation events, which does not mean that receptors were omitted from the assessment. The Applicant has used the official Ordnance Survey base map for the figures and plans submitted as part of the Application. Site surveys were undertaken to supplement the assessments presented with the Application. The Applicant used an Ordnance Survey map to produce the figures, including the maps, as part of the DCO application, which were accurate at the time of publication. Each residential property has not been highlighted on the Application maps due to the scale, and not an error or deliberate omission.
RR-226, RR-164	Comments that the representatives at consultation events were unable to fully respond to queries asked at events.	The Applicant responded to as many questions as possible at consultation events, with a dedicated project team with technical specialists available to answer questions at each event. Any questions which were unable to be answered at the event were taken away and responded to at a later date.

Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
RR-056, RR-311 RR-144, RR-346	Concern over the detail and reliability of answers given by the project team at events. Concern that the Applicant has not provided answers to queries. Concern that project updates via email were not received as agreed.	The Applicant also welcomed and responded to enquiries received via the contact details shared during statutory and targeted consultations on the Scheme webpage and brochure. Consultees were able to share feedback via an online and hard copy feedback form; freepost; to a project email address; and via telephone, including voicemail. All enquiries received during the consultation period were responded to.
RR-144	Information about public meetings has been shared without much notice.	The Applicant has fully met the statutory consultation requirements of the pre-application process, including the duty to publicise the proposed application under section 48 Planning Act 2008. Information about public meetings was given with adequate notice during non-statutory consultation, as part of ongoing engagement and during statutory consultation (as set out in 2.4 – 3.1.17 of the Consultation Report). The Consultation Report **[APP-025]** describes the phased consultation process undertaken by the Applicant in accordance with the Planning Act 2008 and the Statement of Common Ground (SoCG) issued for the statutory consultation stage.
RR-144	Concern that only the Applicant's reports will be taken in the consideration of this DCO application, and suggestion that independent reports need to be commissioned to provide more objectivity.	The Scheme is now in a 6-month Examination process, which is independently managed by the Planning Inspectorate on behalf of the Secretary of State. As part of the Examination, interested parties (including those who have made relevant representations) have the opportunity to submit further written representations and to respond in writing to the Applicant's submissions, in addition to participating at hearings.
RR-176	Suggestion that the Scheme will have large impacts to locals and an opportunity to meet with the Applicant would be welcomed to reassure locals.	The Applicant carried out three rounds of consultation (Non statutory Consultation, Statutory Consultation and the Targeted Consultation) during the pre-application period ahead of finalising its proposals for the Scheme. This included a number of events, where the community had the opportunity to meet the Applicant and ask any questions. Requirement 4 of Schedule 2 of the Draft DCO **[AS-008]** requires the Applicant to establish a community liaison group prior to the commencement of the authorised development, through to the final commissioning of the Scheme. Terms of reference for the group must be approved in advance by the local planning authority. This group will facilitate liaison between the Applicant and the local community during construction.
RR-311, RR-073 RR-200	Comment that feedback from locals has not been listened to and that efforts have not been made to mitigate or address such concerns.	Mechanisms for securing feedback during the non-statutory consultation are outlined in section 2.6 of the Consultation Report **[APP-025].** Changes made to the Scheme in response to this feedback in detailed in section 2.9 of the Consultation Report. Mechanisms for securing feedback during the statutory consultation are outlined in section 3.11 of the Consultation Report **[APP-025]**. A summary of the issues raised is discussed in section 4.6 and the changes made in response to this feedback are outlined in section 4.7 of the Consultation Report **[APP-025]**.
RR-331	Concern that residents were told the size of the Scheme would shrink down, however, the size has increased.	The Scheme design is the result of an iterative design process which delivers the Scheme's functionality, the generation of a large amount of renewable electricity using single axis tracker solar technology, whilst addressing the local context and setting within which it is located. The Applicant's design team has worked collaboratively to provide an integrated and responsive design which has been informed by the process of environmental impact assessment, statutory consultation and stakeholder engagement.
RR-091, RR-324	Concern that the Scheme location in a rural area with a low population is a tactic to reduce the number of objections.	The Applicant has set out its rationale for selecting the Solar PV Site in Chapter 3: Alternatives and Design Evolution within the ES **[APP-055].** This explains the stages and the main considerations which have influenced the Applicant in how it has selected the land for the Scheme. For the Solar PV Site this has included seeking to avoid environmental and land use constraints and taking into consideration other criteria such as topography; field pattern and arrangement; land use conflict, as well as land availability.

Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
		The Applicant has fully met the statutory consultation requirements of the pre-application process. The Consultation Report **[APP-025]** report describes the phased consultation process undertaken by the Applicant in accordance with the Planning Act 2008) and the SoCC issued for the statutory consultation stage.
RR-115	Concerns that the proposal included faulty and inaccurate information about the area and therefore residents are not confident in its consideration and assessment of the impact on the surrounding area.	The relevant representation does not provide detail as to which information included with the proposal is faulty and inaccurate. The Applicant has based the assessments on up-to-date information sourced from official organisations, as well as a range of specialist field surveys and monitoring campaigns carried out in 2022–2024. The assessments have been undertaken by a team of specialists with relevant qualifications and experience in their respective fields. Statutory Consultees were able to comment on the application and submitted PEI Report during the Statutory Consultation. During examination, Statutory Consultees will have the opportunity to comment on the submitted application documents.

Cumulative Effects and Interactions

Table 2-24. Applicant's Responses to Public Relevant Representations relating to Cumulative Effects and Interactions

Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
RR-013, RR-034 RR-049, RR-052 RR-077, RR-106 RR-112, RR-120 RR-127, RR-128 RR-158, RR-174 RR-193, RR-200 RR-210, RR-213 RR-215, RR-216 RR-216, RR-257 RR-275, RR-285 RR-301, RR-325 RR-331, RR-333 RR-342, RR-360	Concern about the cumulative landscape impact from the Scheme and other developments, including housing to the North of Howden and wind turbines. It was noted that some wind turbines are located in clusters. Concerns that there has been a lack of sensitivity towards the villages which have already been impacted significantly with the erection of wind turbine.	The assessment of cumulative impacts of the Scheme with other existing and proposed energy developments as well as other developments in the locality is set out in chapters 6 – 16 of the ES **[APP-058 to APP-061, AS-014, APP-064 to APP-067, and AS-016]** and is summarised in Chapter 17: Cumulative Effects and Interactions of the ES **[APP-069].** The shortlist of cumulative developments, presented in Appendix 17-1, ES Volume 2 **[APP-125]**, was prepared and shared with ERYC and North Yorkshire Council for agreement in preparing the ES. No new likely significant adverse effects are anticipated to arise from the Scheme when considered alongside those effects generated by nearby developments. The functional improvement of soil resources that would follow conversion of arable land to grassland when considered with the other solar farm proposals in North Yorkshire has been assigned a moderate beneficial and significant effect.
RR-052, RR-112	Concern about the cumulative impact of the Scheme, Drax Power Station, and / or bio-gas plants in the area, especially Howden. A respondent has cited that local plants have damaged rural roads, and this has led to disagreement locally.	The assessment of cumulative impacts of the Scheme with other existing and proposed energy developments as well as other developments in the locality is set out in chapters 6 – 16 of the ES **[APP-058 to APP-061, AS-014, APP-064 to APP-067, and AS016]** and is summarised in Chapter 17: Cumulative Effects and Interactions of the ES **[APP-069].** No new likely significant adverse effects are anticipated to arise from the Scheme when considered alongside those effects generated by nearby developments. Measures to minimise community disturbance from traffic and damage to roads as a result of the Scheme are provided in the Framework CTMP **[APP-238].** Detailed management plans will need to be approved post consent prior to construction by the relevant local authorities. These detailed management plans must substantially accord with the framework management plans and this is secured by Requirement 13 in Schedule 2 to the Draft DCO **[AS-008].**
RR-158	Concern about two proposed solar farms and cumulative effects, in or west of Camblesford.	Appendix 17-1, ES Volume 2 **[APP-125]** sets out the developments which have been identified within the short list of cumulative schemes. The assessment of cumulative impacts of the Scheme with other existing and proposed energy developments as well as other developments in the locality is set out in chapters 6 – 16 of the ES **[APP-058 to APP-061, AS-014, APP-064 to APP-067, and AS-016]** and is summarised in Chapter 17: Cumulative Effects and Interactions of the ES **[APP-069].** No new likely significant adverse effects are anticipated to arise from the Scheme when considered alongside those effects generated by nearby developments.
RR-184	Concern over cumulative biodiversity and wildlife impacts from the Scheme, wind farms and bio-gas plants, in particular hedgerow and arboriculture damage. Concern over safety and the local environment.	Section 8.10 of Chapter 8: Ecology, ES Volume 1 **[APP-060]** assesses the likely significant effects of the Scheme in combination with the likely significant effects of other proposed and committed plans and projects including other developments (referred to as 'cumulative schemes') within the surrounding area on Ecology. No significant cumulative effects have been identified.
RR-267	Concern about the proximity of the Scheme to Howden, which has already experienced impacts due to increased housing developments. Future housing is planned and current roads struggle to cope with such new infrastructure.	Appendix 17-1, ES Volume 2 **[APP-125]** sets out the developments which have been identified within the short list. Section 13.10 of Chapter 13: Traffic and Transport, ES Volume 1 **[APP-065]** assesses the potential effects of the Scheme in combination with the potential effects of other proposed and committed plans and projects including other developments (referred to as 'cumulative schemes') within the surrounding area on Traffic and Transport.

Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
	Concern that cumulative effects have already resulted in the cancellation of long-standing local events.	Measures to minimise community disturbance from traffic and damage to roads as a result of the Scheme are provided in the Framework CTMP**.** Detailed management plans will need to be approved post consent prior to construction by the relevant local authorities. As part of the CTMP, restrictions on HGV and tractor-trailer movements on roads through Howden and north from Howden along the B1228 Station Road would also be introduced. These detailed management plans must substantially accord with the framework management plans and this is secured by requirement 13 in Schedule 2 to the Draft DCO [**AS-008].**
RR-073	Concern over the proximity of the Scheme to Goole and Howden, based on how close factories in these areas are to the National Grid.	Appendix 17-1, ES Volume 2 **[APP-125]** sets out the developments which have been identified within the short list. The assessment of cumulative impacts of the Scheme with other existing and proposed energy developments as well as other developments in the locality is set out in chapters 6 – 16 of the ES **[APP-058 to APP-061, AS-014, APP-064 to APP-067, and AS-016]** and is summarised in Chapter 17: Cumulative Effects and Interactions of the ES **[APP-069].** No new likely significant adverse effects are anticipated to arise from the Scheme when considered alongside those effects generated by nearby developments.
RR-096	Concern that the Scheme will add to space taken up by the existing wind farms and bio-gas plants, adding additional solar panels where they are already proposed in these other areas.	Appendix 17-1, ES Volume 2 **[APP-125]** sets out the developments which have been identified within the short list. The assessment of cumulative impacts of the Scheme with other existing and proposed energy developments as well as other developments in the locality is set out in chapters 6 – 16 of the ES **[APP-058 to APP-061, AS-014, APP-064 to APP-067, and AS-016]** and is summarised in Chapter 17: Cumulative Effects and Interactions of the ES **[APP-069].** No new likely significant adverse effects are anticipated to arise from the Scheme when considered alongside those effects generated by nearby developments.
RR-294, RR-213 RR-226, RR-122 RR-342, RR-263 RR-040	Concern about the cumulative impacts from the Scheme, new large residential and industrial developments in the area.	Appendix 17-1, ES Volume 2 **[APP-125]** sets out the developments which have been identified within the short list. The assessment of cumulative impacts of the Scheme with other existing and proposed energy developments as well as other developments in the locality is set out in chapters 6 – 16 of the ES **[APP-058 to APP-061, AS-014, APP-064 to APP-067, and AS-016]** and is summarised in Chapter 17: Cumulative Effects and Interactions of the ES **[APP-069].** No new likely significant adverse effects are anticipated to arise from the Scheme when considered alongside those effects generated by nearby developments.
RR-254	Concern that cumulative effects would result in impacts on the wellbeing of the community, local tourism and enjoyment of nature.	Appendix 17-1, ES Volume 2 **[APP-125]** sets out the developments which have been identified within the short list. Section 14.10 of Chapter 14: Human Health, ES Volume 1 **[APP-066]** assesses the potential effects of the Scheme in combination with the potential effects of other proposed and committed plans and projects including other developments (referred to as 'cumulative schemes') within the surrounding area on Human Health. It is not anticipated that there will be any cumulative effects on access to healthcare services. Section 12.10 of Chapter 12: Socio-Economics and Land Use, ES Volume 1 **[APP-064]** assesses the potential effects of the Scheme in combination with the potential effects of other proposed and committed plans and projects including other developments (referred to as 'cumulative schemes') within the surrounding area Socio-Economics and Land Use. It concludes that during the construction and the decommissioning phase, there is potential for minor adverse effects on residential properties, business premises, community facilities and development land associated with land take, amenity, and connectivity impacts. There is limited information available on how the cumulative schemes might affect such assets during the construction and decommissioning stage, however based on the assumption that each scheme will be designed to minimise such impacts wherever possible, it is considered that the cumulative effect is likely to remain minor adverse (not significant). If cumulative schemes are built at the same time as the Scheme, it is proposed that the Contractor for the Scheme liaises with the other projects to minimise cumulative issues as far as practical. There are no significant adverse cumulative effects therefore predicted when taking into account these other projects along with the Scheme.

Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
RR-357, RR-291 RR-065, RR-267	Concern about the cumulative impact of noise in addition to those from the nearby wind turbines. Request for the Scheme's planning to be revised. The concentrated nature of developments near to Howden would create long-term noise impacts. The current cumulative effects are hard to manage.	Section 11.10 of Chapter 11: Noise and Vibration, ES Volume 1 **[APP-063]** assesses the potential effects of the Scheme in combination with the potential effects of other proposed and committed plans and projects including other developments (referred to as 'cumulative schemes') within the surrounding area on noise and vibration. Cumulative noise effects during construction and operation phases may occur when developments are located nearby to a common receptor. Based on professional judgement, at distances of greater than 500 m any interaction of noise emissions from multiple developments would be attenuated such that there would normally be no combined effect. The baseline data for the noise assessment was collected through noise monitoring and local wind energy developments (Spaldington Airfield Wind Farm and the individual turbine off Tottering Lane by Solar PV Area 1c) were identified as local noise sources that influence noise conditions. Therefore, the noise modelling considers the combined effect of the Scheme and the wind turbines (and other existing local sources of noise). The assessment concludes that no cumulative effects are predicted to occur.

The Scheme Design

Table 2-25. Applicant's Responses to Public Relevant Representations relating to The Scheme Design

Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
RR-020, RR-024 RR-028, RR-046 RR-064, RR-069 RR-075, RR-084 RR-086, RR-091 RR-095, RR-097 RR-106, RR-108 RR-110, RR-112 RR-116, RR-120 RR-128, RR-132 RR-138, RR-138 RR-170, RR-176 RR-195, RR-202 RR-249, RR-252 RR-285, RR-294 RR-299, RR-302 RR-305, RR-318 RR-347, RR-356 RR-357	Concern that the Scheme's design parameters are too large, including the height and distribution of the solar panels and the height of the fence and substation. Concerns that the size may affect quality of life and enjoyment of the area and that the design and layout will enclose particular local areas.	The Government has identified through its energy policy, most recently in the Overarching National Policy Statement for Energy EN-1 and National Policy Statement for Renewable Energy EN-3, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's Statement of Need **[APP-232],** this includes low carbon energy generation using solar technology. Developing the Scheme at its proposed size will therefore be an important contribution to meeting this need. The Scheme design is the result of an iterative design process which delivers the Scheme's functionality, the generation of a large amount of renewable electricity using single axis tracker solar technology, whilst addressing the local context and setting within which it is located. The Applicant's design team has worked collaboratively to provide an integrated and responsive design which has been informed by the process of environmental impact assessment, statutory consultation and stakeholder engagement. As set out in the DAS **[APP-234]** design objectives have guided the design response from an early stage to develop a good design that balances the need to maximise renewable energy generation from the Scheme, whilst minimising potential adverse impacts and providing mitigation and enhancement measures where practicable. This has resulted in a Scheme which, with the implementation of mitigation, avoids residual significant adverse effects in relation to designated landscapes; biodiversity sites; protected species or habitats; agricultural land; heritage assets; flood risk; water quality; access; and land uses within the Howden area. Impacts on the local area have therefore been minimised as far as practicable. One of the Scheme's design objectives is to ensure the design responds sensitively to residential properties in proximity to the Scheme regarding visual impact, noise, and lighting. This design approach is in accordance with paragraph 5.10.22 of NPS EN-1 and paragraph 2.10.131 to 2.10.133 of NPS EN-3. To achieve this, the Scheme design retains existing vegetation as far as practicable and proposes carefully designed planting to provide screening. The design also incorporates buffers from residential properties to the solar PV infrastructure which are shown on the Framework Landscape Masterplan and the design commits to positioning noise emitting Field Stations 250 metres (m) or further from residential properties. The two Grid Connection Substations proposed as part of the Scheme are also greater than 250 m from residential properties. Details of the proposed screening and buffers including existing vegetation to be retained and proposed planting are provided in the Framework LEMP **[APP-246]** and illustrated on the Framework Landscape Masterplan included as Appendix A of the Framework LEMP **[APP-246]** and Section 5.4 of the DAS **[APP-234].** Existing hedgerows will be retained as far as practicable. Buffers of grassland, native scrub, woodland and traditional orchard will be created around the edge of the Solar PV Areas and other larger areas of grassland will be created which will offer habitat for wildlife..
RR-005, RR-009 RR-064, RR-080 RR-083, RR-110 RR-116, RR-128 RR-132, RR-157 RR-196, RR-219 RR-285, RR-330	Concerns that the 40-year life span is not temporary and it is likely that another application will replace the Scheme.	The Applicant is proposing a 40-year operational design life of the Scheme which is typical for solar farms, and is secured by Requirement 18 of Schedule 2 of the Draft DCO. National Policy Statement EN-3 for Renewable Energy Infrastructure sets out at paragraph 2.10.149 that for solar developments, an upper limit of 40 years is typical. At the end of the 40 years, the Site would be decommissioned and returned back to its former condition and land use. Some areas of habitat and biodiversity mitigation and enhancement may be left for species protection. Further details are set out in the DEMP [**APP-240].** Any future development on the land would require the submission and approval by relevant planning authorities of a further application.

Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
RR-302	Concerns relating to tunnelling under the River Derwent.	The Grid Connection Corridor crosses the River Derwent. HDD is a trenchless method of cable installation which allows the cables to be installed beneath obstacles/sensitive receptors without having a direct impact on them. The impact of this cable installation has been assessed in the relevant ES chapters; including in relation to noise (Chapter 11: Noise and Vibration, ES Volume 1 **[APP-063]**) and Ecology (Chapter 8: Ecology, ES Volume 1 **[APP-060]**).
RR-289	Support for engineering, technology and design of the Scheme, noting the temporary nature of solar farms and that farmland will not be impacted. Support for the benefits for sheep grazing under panels.	The Applicant notes this comment.
RR-204, RR-021 RR-285, RR-211	Concern about delays in the time between installation of the panels and the connection to the grid, specifically concerns that connection to the Grid would not be possible until 2029 and that the development would be constructed 2 years prior to this.	Subject to the grant of the DCO, the Applicant would seek to bring the connection date forward with National Grid, if the Scheme can be completed prior to 2029. If this is not viable due to the National Grid upgrade works required, the Scheme will commence building 2 years prior to the connection date, to ensure that the connection is made on the due date. The programme would be arranged to minimise / avoid any period of time between the completion of construction and the connection date. The Draft DCO **[AS-008]** allows construction to begin after the required pre-commencement requirements are approved and up to five years from the date the DCO comes into force. Although the EIA specifically mentions 2025-2027 for construction, where relevant, the technical assessment considers the effect should this be delayed or be protracted for any reason (it is not expected feasible to begin earlier than 2025) and have the potential to create different effects. It is not expected that a later construction period (say 2027-2029) or longer construction period would cause new or different effects to those already outlined in the ES. The latter is more critical to the assessment of impacts and is considered in the technical assessments; for example Chapter 8 Ecology **[APP-060]** (paragraph 8.4.2) states "Should the construction programme be extended this will not change the results of the EclA [Ecological Impact Assessment] with respect to flora, as the impact is not affected by the duration of activity but rather the change or loss of any habitats. The impact on fauna is likely to be similar if the construction period is extended, with respect to any habitat loss. The assessment is also considered to represent a worst case in terms of impacts to species. For example, although it is acknowledged that a longer construction period could result in prolonged disturbance, this is unlikely to occur for the majority of the Site due to the sequential nature of the construction programme."
RR-175, RR-327 RR-170, RR-183	Concern that solar panels will not be effective particularly due to seasonal changes.	The Solar PV Panels will be secured on single axis trackers that are orientated north-south. The panels will track from east to west during the course of the day tracking the sun's movement. This allows for optimal power generation throughout the day and during different seasons, generating more renewable electricity over the year relative to the traditional south facing fixed arrangement.
RR-348, RR-132	Concern that the Scheme is inappropriate for the area and the wider area will be impacted due to the cables or pylons connecting to the National Grid.	The Applicant has set out its rationale for selecting the Solar PV Site in Chapter 3: Alternatives and Design Evolution within the ES **[APP-055].** This explains the stages and the main considerations which have influenced the Applicant in how it has selected the land for the Scheme. For the Solar PV Site this has included seeking to avoid environmental and land use constraints and taking into consideration other criteria such as topography; field pattern and arrangement; land use conflict, as well as land availability. In accordance with NPS EN-1 paragraph 5.11.3 and NPS EN-3 paragraph 2.10.29 the Applicant considered the use of previously developed land and did not identify any available land within its area of search of an appropriate size to locate the Scheme. In accordance with NPS EN-1 paragraph 5.11.12 and NPS EN-3 paragraphs 2.10.29 to 2.10.34 the Applicant has taken a sequential approach to the use of agricultural land considering whether land of lower grade is available and suitable. Following the identification of an area of search derived from the point of connection at the National Grid Drax Substation

Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
		the Applicant did not identify any alternative sites which would be of lower grade agricultural land (compared to the majority of the Order limits) that were available or considered suitable for the Scheme and its objectives. The Scheme design does not include pylons or overhead lines. It is known that there are existing utilities located within the Site, such as Northern Gas Network pipelines and National Grid Electricity Transmission (NGET) overhead cables, that require Protective Provisions during the construction (and decommissioning) phase of the Scheme and will be agreed as set out in the Draft DCO **[AS-008].** The Applicant is currently in correspondence with asset owners with regards to protecting utility assets.
RR-163	Concerns regarding the use of battery storage.	The Scheme does not propose the use of a Battery Energy Storage System.
RR-170	Concerns regarding the removal of the panels after 40 years and who will undertake this.	The Framework DEMP **[APP-240]** provides details on the decommissioning of the Scheme. A detailed DEMP(s) will be produced in line with this Framework DEMP following the grant of the DCO when the Scheme is due to be decommissioned. It will then be submitted to the appropriate Local Planning Authorities (LPA) for approval, in accordance with Requirement 18 of the Draft DCO **[AS-008]**. The requirement to decommission the Scheme is the responsibility of the undertaker for the purposes of the DCO.
RR-177, RR-066	Concern that the land will not be returned to its former state.	Within the Solar PV Site the physical infrastructure will be removed to plough depth at the Site and the land returned to the landowners. This will include the areas of agricultural land where the agricultural resource has been maintained (and potentially improved) during operation, and the established habitats. Post-decommissioning, the landowner is expected to return the Site to its current use (but would have the ability to choose to leave it as grassland, create woodland, or other managed habitat such as wetland). Further detail is set out within the Framework DEMP **[APP-240].**
RR-064, RR-235	Concern that the panels are motorised and of a size never before used in the UK and have not been tested. Concerns that the technical aspects of the Scheme will not be scrutinised.	The panels will track the sun east to west during the course of the day, tilting to maximise the potential energy generation. Single access tracker technology is considered to be the most efficient option for the Scheme, enabling it to deliver the maximum amount of energy during daylight hours. The Scheme design retains flexibility to allow for the selection of the most efficient technology. Solar generation technology is developing at a fast pace, with better, more efficient and more cost-effective solar PV panels coming to the market. The Applicant is therefore seeking to retain the flexibility to choose the precise technology close to the point of the construction of the Scheme. This will enable the optimum production of renewable energy and subsequently reduce cost for the end user. The final technology installed will be required to remain within the parameters defined by the Works Plan **[APP-008]** and Outline Design Principles Statement **[APP-235]**. This technology is tried and tested in other countries and fully expected to work as expected in the UK. There is an opportunity for the examination Authority to raised questions regarding the Scheme design during examination.
RR-004	Concerns that yield of solar panels is disproportionate to the value of the land they sterilize.	The Government has identified through its energy policy, most recently in the Overarching National Policy Statement for Energy EN-1 and National Policy Statement for Renewable Energy EN-3, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's Statement of Need **[APP-232]**, this includes low carbon energy generation using solar technology. Developing the Scheme at its proposed size will therefore be an important contribution to meeting this need. The vast majority of agricultural land within the Order limits would be available for return to its existing agricultural use following decommissioning of the Scheme. Chapter 15: Soils and Agricultural Land within the ES **[APP-067]** concludes

Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
		that a very small amount (0.41 ha) of BMV Subgrade 3a agricultural land for tree planting would be permanently removed from agricultural use but would provide a permanent ecological benefit. In relation to non-BMV land, 8.97 ha of Subgrade 3b agricultural land would be permanently removed from agricultural use as a result of tree and hedge planting, and further 2 ha of Subgrade 3b agricultural land would be permanently removed as a result of the potential retention of the Grid Connection Substations and associated accesses. In addition, the conversion of arable land to grassland during the 40 year operational period has the potential to accrue improvement to soil function over a large area.
RR-132	Concerns regarding the lack of power produced by the solar farm. Example given that the current largest solar farm in the UK is Shotwick Solar Park on the border of England and Wales, which is 250 acres and produces 72.2MW of electricity. The Schem proposes to use 3500 acres and produce 400MW of electricity. That is 0.11MW per acre, whereas Shotwick produces over twice that much at 0.28MW per acre.	National Policy Statement (NPS) EN-3 states in Paragraph 2.10.17 that "*Along with associated infrastructure, a solar farm requires between 2 to 4 acres for each MW of output. A typical 50MW solar farm will consist of around 100,000 to 150,000 panels and cover between 125 to 200 acres. However, this will vary significantly depending on the site, with some being larger and some being smaller. This is also expected to change over time as the technology continues to evolve to become more efficient. Nevertheless, this scale of development will inevitably have impacts, particularly if sited in rural areas.*" As set out in the Statement of Need **[APP-232]** the operational requirements needed for the east-west single axis tracker solar technology proposed and environmental mitigation measures required have determined the generating capacity of the Solar PV Site. As the Scheme delivers the east-west single axis tracker solar technology this has a greater land take than the 2 to 4 acres per MW specified by NPS EN-3 at paragraph 2.10.17, to allow spacing between panel arrays to avoid shading. This is considered appropriate to maximise energy generation from this type of solar technology.
RR-083	Concern that 26 more new generation (15+ MW) wind turbines in the offshore fields could deliver the equivalent output (400MW) or more whilst retaining precious countryside and productive farmland.	Chapter 3: Alternatives and Design Evolition, ES Volume 1 **[APP-055]** describes the consideration of alternatives and design evolution in relation to the Scheme, including wind power.
RR-196, RR-170 RR-230, RR-254	Concern about the length of time before the Scheme is deemed carbon neutral.	Based on estimates of the cumulative saving from operation of the East Yorkshire Solar Farm compared against a Combined-Cycle Gas Turbine (CCGT), there is an estimated three year carbon payback period from the first year of operation to break even on the cumulative emissions savings from operation of the Scheme. This payback period is for the whole-life carbon cost of the project, including operational emissions from replacements which wouldn't occur in the first three years, and so is considered a conservative, 'worst-case' scenario against the alternative future baseline. Further details are set out in Chapter 6: Climate Changes, ES Volume 1 **[APP-058]**.
RR-254	Concern about the Scheme creating a 'heat island' effect.	Regarding the 'heat island' effect, some studies suggest that solar farms may produce a cooling effect on land surface temperatures or otherwise cool completely overnight, making it unlikely for a heat island effect to occur (Xu et al 2024, Vervloesem et al 2022, Masson et al 2014, and Fthenakis and Yu, 2013). It is acknowledged that other research has also found warmer temperatures over PV plants than wildlands (Barron-Gafford et al, 2016) however, on balance this is not considered a material risk for the application proposal. It may also be noted that Barron-Gafford study referenced was conducted in Arizona, USA in a desert environment, and is not considered to be representative of the environment surrounding the Scheme.
RR-011, RR-333	Concerns about the efficiency of solar.	The Scheme, as a leading large-scale solar scheme in the UK, represents approximately 2% of the additional solar generation capacity required in the Future Energy Scenarios projections to 2030, for scenarios compatible with net zero only. In this context, the Scheme is therefore an essential stepping stone towards the future of efficient decarbonisation through the deployment of large-scale, technologically and geographically diverse low-carbon generation assets. Further discussion is set out within the Planning Statement **[APP-233]**.

Alternatives and Design Evolution

Table 2-26. Applicant's Responses to Public Relevant Representations relating to Alternatives and Design Evolution

Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
RR-005, RR-011 RR-012, RR-013 RR-018, RR-019 RR-021, RR-027 RR-028, RR-034 RR-035, RR-037 RR-039, RR-040 RR-043, RR-049 RR-051, RR-052 RR-064, RR-065 RR-070, RR-072 RR-073, RR-077 RR-084, RR-086 RR-095, RR-104 RR-106, RR-108 RR-110, RR-120 RR-121, RR-123 RR-126, RR-127 RR-128, RR-129 RR-132, RR-138 RR-141, RR-144 RR-151, RR-152 RR-159, RR-161 RR-163, RR-164 RR-176, RR-178 RR-179, RR-180 RR-188, RR-190 RR-191, RR-193 RR-195, RR-196 RR-197, RR-200 RR-201, RR-211 RR-215, RR-225 RR-226, RR-230 RR-230, RR-234 RR-235, RR-239 RR-241, RR-243 RR-244, RR-245 RR-251, RR-254 RR-256, RR-257 RR-262, RR-263 RR-272, RR-294 RR-304, RR-305 RR-307, RR-317 RR-329, RR-331	Concerns regarding the scale of the development. Reference is made to Policy ENV1 of the East Riding of Yorkshire Council Local Plan. Acknowledgement of the need for solar but not at this scale. Requests for a reduction in the size of the development.	The Government has identified through its energy policy, most recently in the Overarching National Policy Statement for Energy EN-1 and National Policy Statement for Renewable Energy EN-3, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's Statement of Need **[APP-232],** this includes low carbon energy generation using solar technology. Developing the Scheme at its proposed size will therefore be an important contribution to meeting this need. The Scheme design is the result of an iterative design process which delivers the Scheme's functionality, the generation of a large amount of renewable electricity using single axis tracker solar technology, whilst addressing the local context and setting within which it is located. The Applicant's design team has worked collaboratively to provide an integrated and responsive design which has been informed by the process of environmental impact assessment, statutory consultation and stakeholder engagement. As set out in the DAS **[APP-234]** design objectives have guided the design response from an early stage to develop a good design that balances the need to maximise renewable energy generation from the Scheme, whilst minimising potential adverse impacts and providing mitigation and enhancement measures where practicable. This has resulted in a Scheme which, with the implementation of mitigation, avoids residual significant adverse effects in relation to designated landscapes; biodiversity sites; protected species or habitats; agricultural land; heritage assets; flood risk; water quality; access; and land uses within the Howden area. Impacts on the local area have therefore been minimised as far as practicable. By achieving these objectives, the Scheme design meets the criteria that is set out in Policy ENV1 of the East Riding Local Plan 2012-2029 Strategy Document 2016.

Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
RR-333, RR-334 RR-340, RR-344 RR-358, RR-364 RR-366, RR-375		
RR-008, RR-022 RR-023, RR-025 RR-029, RR-037 RR-040, RR-043 RR-048, RR-051 RR-055, RR-060 RR-068, RR-072 RR-073, RR-077 RR-081, RR-086 RR-091, RR-093 RR-108, RR-110 RR-128, RR-129 RR-132, RR-138 RR-141, RR-143 RR-145, RR-152 RR-164, RR-165 RR-167, RR-168 RR-170, RR-174 RR-188, RR-193 RR-195, RR-197 RR-201, RR-202 RR-203, RR-203 RR-213, RR-218 RR-222, RR-225 RR-227, RR-233 RR-237, RR-240 RR-244, RR-257 RR-258, RR-263 RR-275, RR-276 RR-286, RR-292 RR-294, RR-295 RR-298, RR-300 RR-303, RR-306 RR-308, RR-311 RR-317, RR-324 RR-325, RR-328 RR-334, RR-337 RR-340, RR-350 RR-355, RR-358 RR-359, RR-361 RR-373, RR-374	Concerns regarding the consideration of design, location and technology alternatives. In particular, reference to the development being better suited to an industrial area, on existing infrastructure e.g. homes, brownfield sites and on areas where there are existing wind farms. There is a view that this should be compulsory and an alternative to solar farms. Concerns regarding the adequacy of alternatives considered. Reference to the use of Eggborough Power Station for the provision of solar.	The Applicant has set out its rationale for selecting the Solar PV Site in Chapter 3: Alternatives and Design Evolution within the ES **[APP-055]**. This explains the stages and the main considerations which have influenced the Applicant in how it has selected the land for the Scheme. For the Solar PV Site this has included seeking to avoid environmental and land use constraints and taking into consideration other criteria such as topography; field pattern and arrangement; land use conflict, as well as land availability. In accordance with NPS EN-1 paragraph 5.11.3 and NPS EN-3 paragraph 2.10.29 the Applicant considered the use of previously developed land and did not identify any available land within its area of search of an appropriate size to locate the Scheme. In accordance with NPS EN-1 paragraph 5.11.12 and NPS EN-3 paragraphs 2.10.29 to 2.10.34 the Applicant has taken a sequential approach to the use of agricultural land considering whether land of lower grade is available and suitable. Following the identification of an area of search derived from the point of connection at the National Grid Drax Substation the Applicant did not identify any alternative sites which would be of lower grade agricultural land (compared to the majority of the Order limits) that were available or considered suitable for the Scheme and its objectives. It is not considered that small scale generation is an alternative to this but complements it. There is approx.14GW currently in the UK from solar, with 5GW of this currently rooftop. Rooftop is expected to double in the next 10 years. The Government has expressed a target for 70GW solar. Rooftop is part of the solution, therefore rooftop solar is not the solution on its own. All scales of solar generation have an important role to play in the UK achieving zero carbon emissions by 2050. Solar panels on roofs are a valuable tool for generating green energy, however there is a limit to how many can be installed at once and how big the arrays can be. This also requires coordination and agreement from a high number of individual owners to install and maintain the panels and associated equipment at each property. It is not currently required by UK law that all new builds must have rooftop solar panels. Building a solar farm, such as the Scheme, reduces the overall cost of installation, and increases energy efficiency.
RR-018, RR-035 RR-037, RR-048	Concerns regarding the location of the development, particularly it being within a rural area that is close to	The Applicant has set out its rationale for selecting the Solar PV Site in Chapter 3: Alternatives and Design Evolution within the ES **[APP-055].** This explains the stages and the main considerations which have influenced the Applicant in

Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
RR-049, RR-051 RR-064, RR-065 RR-078, RR-105 RR-110, RR-120 RR-126, RR-132 RR-138, RR-153 RR-161, RR-188 RR-190, RR-193 RR-196, RR-201 RR-212, RR-234 RR-238, RR-241 RR-243, RR-244 RR-256, RR-262 RR-280, RR-294 RR-301, RR-304 RR-319, RR-334 RR-344, RR-373	residential properties. Respondents had particular concern about Spaldington Village and Gibthorpe.	how it has selected the land for the Scheme. For the Solar PV Site this has included seeking to avoid environmental and land use constraints and taking into consideration other criteria such as topography; field pattern and arrangement; land use conflict, as well as land availability. In accordance with NPS EN-1 paragraph 5.11.3 and NPS EN-3 paragraph 2.10.29 the Applicant considered the use of previously developed land and did not identify any available land within its area of search of an appropriate size to locate the Scheme. In accordance with NPS EN-1 paragraph 5.11.12 and NPS EN-3 paragraphs 2.10.29 to 2.10.34 the Applicant has taken a sequential approach to the use of agricultural land considering whether land of lower grade is available and suitable. Following the identification of an area of search derived from the point of connection at the National Grid Drax Substation the Applicant did not identify any alternative sites which would be of lower grade agricultural land (compared to the majority of the Order limits) that were available or considered suitable for the Scheme and its objectives. One of the Scheme's design objectives is to ensure the design responds sensitively to residential properties in proximity to the Scheme regarding visual impact, noise, and lighting. This design approach is in accordance with paragraph 5.10.22 of NPS EN-1. To achieve this, the Scheme design retains existing vegetation as far as practicable and proposes carefully designed planting to provide screening. The design also incorporates buffers from residential properties to the solar PV infrastructure which are shown on the Framework Landscape Masterplan and the design commits to positioning noise emitting Field Stations 250 metres (m) or further from residential properties. The two Grid Connection Substations proposed as part of the Scheme are also greater than 250 m from residential properties.
RR-165, RR-254 RR-273, RR-128 RR-300	Concerns regarding the use of Green Belt Land for the development.	The development is not situated within Green Belt Land.
RR-002	Concern that it would be better to revisit the project in 5 years time to see what is more appropriate.	The urgent need for renewable energy infrastructure to address the causes of climate change is acknowledged at both local and national level. In particular, NPS EN-1 and NPS EN-3 and other recent Government energy and climate change policy and evidence highlight the significant urgency of bringing forward renewable energy infrastructure and that actions to address this urgency need to be accelerated. The Statement of Need **[APP-232]** explains this position in greater detail.

Ecology and Biodiversity

Table 2-27. Applicant's Responses to Public Relevant Representations relating to Ecology and Biodiversity

Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
RR-002, RR-003 RR-008, RR-009 RR-011, RR-012 RR-013, RR-014 RR-017, RR-018 RR-019, RR-020 RR-021, RR-022 RR-024, RR-027 RR-029, RR-034 RR-040, RR-044 RR-045, RR-046 RR-048, RR-051 RR-055, RR-064 RR-065, RR-066 RR-076, RR-080 RR-083, RR-091 RR-093, RR-094 RR-095, RR-096 RR-098, RR-103 RR-104, RR-105 RR-106, RR-108 RR-109, RR-110 RR-111, RR-112 RR-115, RR-116 RR-122, RR-125 RR-126, RR-127 RR-128, RR-129 RR-130, RR-131 RR-132, RR-136 RR-138, RR-140 RR-141, RR-143 RR-144, RR-145 RR-147, RR-150 RR-152, RR-154 RR-156, RR-157 RR-158, RR-159 RR-160, RR-163 RR-164, RR-168 RR-170, RR-173 RR-174, RR-179 RR-179, RR-183 RR-185, RR-186 RR-187, RR-190 RR-191, RR-192	Concerns that the Scheme will result in harm to wildlife through the loss of existing habitats and crops which provide pollinators and through the construction and operation of the Solar PV Site which will result in noise and disruption. Particular reference was made to bees, small mammals, badgers, foxes, newts, otters and loss of hedgerows. Reference is made to the risk of increased poaching.	The Scheme design retains and avoids the majority of habitats of value to other mammals and amphibians, including woodland, grassland margins, ponds, ditches, scrub and hedgerows within the Solar PV Site. The embedded landscape design of the Scheme provides large areas of grassland habitat, including areas free from panels, and field margins, that would provide alternative habitat for other mammals and common amphibians. The Scheme would result in indirect beneficial impacts through a reduction of agriculture chemical inputs to watercourses or reduction in pesticide use on crops within the local area resulting in an increase in prey availability. During operation of the Scheme suitable gaps at the bottom of the perimeter fencing will be maintained to enable continued access into the Solar PV Site or mammals (e.g., badger), which is embedded into the Scheme design (section 8.6 of Chapter 8: Ecology, ES Volume 1 **[APP-060]**). Connectivity across the Site will be maintained. Therefore, it is not considered that the development would result in an increased risk of poaching as mammals can move freely through the site. Habitats within the Site will be suitably managed throughout the lifetime of the Scheme. The Framework LEMP **[APP-246]** sets out the habitat management principles to be followed during the operation of the Scheme. The provision of a detailed LEMP and implementation the management prescriptions it contains will be secured through DCO Requirement 6. During Construction, suitable measures to minimise sky glow, glare, light spillage and noise disturbance will be implemented during the construction phase. These measures are outlined in the Framework CEMP **[APP-238**] which is secured by requirement 11 in Schedule 2 to the Draft DCO **[AS-008]**.

Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
RR-193, RR-197 RR-198, RR-200 RR-201, RR-202 RR-204, RR-210 RR-212, RR-215 RR-216, RR-218 RR-219, RR-220 RR-225, RR-226 RR-231, RR-232 RR-234, RR-236 RR-240, RR-241 RR-242, RR-243 RR-245, RR-246 RR-248, RR-249 RR-252, RR-253 RR-254, RR-256 RR-257, RR-258 RR-259, RR-262 RR-268, RR-271 RR-272, RR-273 RR-274, RR-275 RR-276, RR-280 RR-291, RR-298 RR-300, RR-301 RR-302, RR-303 RR-305, RR-307 RR-309, RR-311 RR-317, RR-318 RR-323, RR-324 RR-325, RR-326 RR-328, RR-330 RR-331, RR-332 RR-333, RR-334 RR-338, RR-339 RR-343, RR-345 RR-346, RR-348 RR-350, RR-356 RR-357, RR-358 RR-360, RR-362 RR-365, RR-368 RR-372, RR-374 RR-375		
RR-029	Concerns regarding damage to nature reserve verges from vehicles.	Chapter 8: Ecology, ES Volume1 **[APP-060]** presents the findings of an assessment of the likely significant effects of the Scheme on ecology, including Local Wildlife Sites. Both Wressle Verge Local Wildlife Site (LWS) and Tottering Lane, Gribthorpe LWS will be impacted, with temporary effects through the installation of interconnecting cables, and permanent access entrances across Tottering Lane and Wressle Verge. Standard environmental protection measures formalised through the Framework CEMP **[APP-238]** includes dust suppression and pollution prevention measures.

Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
		The Framework CTMP **[APP-238]** has been developed to include appropriate access routes for construction vehicles which would seek to minimise the impacts and disturbance to local road users. The assessment within Chapter 8: Ecology, ES Volume 1 **[APP-060]** includes consideration of site access locations and any areas where traffic routing for HGV or Abnormal Indivisible Loads (AIL) ingress on verges may close to ancient or veteran trees.
RR-164, RR-034	Concerns that the impact on wildlife has not been adequately considered. Reference was made to the adequacy of surveys carried out.	Chapter 8: Ecology, ES Volume 1 **[APP-060]** presents the findings of an assessment of the likely significant effects of the Scheme on ecology. The assessment methodology is set out in Section 8.4 of this Chapter 8. Habitat and species surveys were undertaken within the Site and its immediate vicinity. Table 8-3 of Chapter 8 sets out the Ecological Surveys that have been undertaken.
RR-066, RR-201	Concerns that the solar panels will confuse insects due to their appearance resulting in insects laying eggs on them.	The submitted Habitats Regulation Assessment (HRA) **[APP-244]** acknowledges that there is some indication that PV panels may be associated with ecological knock-on effects. For example, in specific conditions, reflected polarised light is attractive to some polarotactic insects, which may attempt to lay eggs on what they perceive as a water surface. Chapter 2: The Scheme, ES Volume 1 **[APP-054]** provides background on the design specifications of the Scheme. It identifies that the tilted solar PV technology is designed to maximise the absorption of sunlight rather than reflecting it. Chapter 8: Ecology, ES Volume 1 **[APP-060]** states in paragraph 8.7.12 that the likelihood of aquatic insects from the local aquatic habitat of Local (Low) Importance being attracted to large open areas of shiny surfaces is low given that such species will preferentially use smaller shiny surfaces. Most of the aquatic insect species recorded are of low conservation value, and do not use open water areas for any of their behaviours (i.e., few Odonata were recorded for example). The impact of solar PV panels on these aquatic insects would therefore be negligible.
RR-003, RR-008 RR-011, RR-013 RR-019, RR-021 RR-040, RR-055 RR-066, RR-072 RR-080, RR-096 RR-104, RR-129 RR-140, RR-158 RR-160, RR-179 RR-201, RR-232 RR-248, RR-253 RR-258, RR-259 RR-291	Concerns that the development would impact on breeding and non-breeding birds through habitat loss and disruption to feeding grounds. In particular reference was made to birds of prey, skylarks, owls, king fishers, tree and house sparrows, yellow hammers, cuckoos, lesser and greater spotted woodpeckers, hobbys, curlews and pink footed geese. Concerns that the solar panels will confuse birds due their appearance resulting in birds landing and colliding with the solar panels. Comments noted that parts of the site area designated in Easington for lapwing and designated for brown hairstreak, corn bunting, curlew, red shank and snipe.	Chapter 8: Ecology, ES Volume 1 **[APP-060]** presents the findings of an assessment of the likely significant effects of the Scheme on ecology, including on breeding and non-breeding birds. The submitted HRA report **[APP-244]** assesses the impact of the Scheme on protected European sites including to land functionally linked to these sites. The HRA Report concludes that, in the absence of mitigation, construction of the Scheme is likely to result in an overall reduction of arable farmland used by qualifying bird species of the Lower Derwent Valley SPA/Ramsar and the Humber Estuary SPA/Ramsar, with abundances of golden plover and pink-footed goose, just reaching or approaching the 1% population threshold (taking account of inter-annual variations in cropping patterns). To prevent significant adverse effects on the integrity of these European sites, mitigation in the form of maintained agricultural land and creation of permanent wet/damp grassland will be provided as part of the Ecology Mitigation Areas 1g and 1h. Within the Solar PV Site, areas of undeveloped land (shown as 'Proposed Ecological Enhancement Areas' on the Landscape Masterplan (Appendix A of the Framework LEMP **[APP-246]**) totalling 20.5 ha, have been included within the Scheme which will be sown with floristically diverse seed mixes used to maximise both nesting habitat for ground-nesting birds such as Skylark, but also invertebrate prey for chicks (during the Skylark breeding season) as well as seeds for adults (in both winter and summer). The HRA Report **[APP-244]** acknowledges that reflected light from photovoltaic panels may represent a minor collision risk for birds attempting to drink from reflective surfaces. However, these risks are unlikely to apply to qualifying birds in the Lower Derwent Valley SPA/Ramsar and Humber Estuary SPA/Ramsar (none of which feed on the wing). The maximum height of the solar PV panels will be up to 3.5m (at maximum tilt). In the context of existing vegetation in the landscape, e.g., hedgerows, trees and woodland, the solar PV panels will not cause a physical impediment to bird movements across the landscape.

Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
		Equally, birds transiting across the landscape are doing so on a broad front, i.e., there are no topographical or geographical features in the landscape to 'funnel' or concentrate bird movements, therefore, the exposure time to any possible reflected polarised light (glint or glare) is extremely low and is not considered as part of the HRA assessment.
RR-003, RR-012 RR-014, RR-040 RR-046, RR-066 RR-072, RR-080 RR-093, RR-096 RR-098, RR-104 RR-140, RR-150 RR-158, RR-179 RR-196, RR-200 RR-201, RR-226 RR-243, RR-248 RR-253, RR-256 RR-259, RR-261 RR-262, RR-276 RR-300, RR-302 RR-305, RR-313 RR-321, RR-325 RR-328, RR-372	Concerns that the proposed fencing would impact on large animals such as foxes, deer and hares moving around the Site. Concerns that the fencing would direct these animals towards roads which could result in vehicle collisions.	Areas of the Solar PV Site will remain free of panels and will provide habitat suitable for wildlife. Overall, the Scheme is aiming to deliver a net gain in biodiversity. Buffers of land between any structures and retained natural features, such as hedgerows, trees, woodland, ponds and rivers are retained and included in the design to protect them during construction. In addition to this, grassland creation, tree planting and enhancement of existing hedgerows will offer habitat and food resources for a range of species. More information can be found within the BNG Assessment **[APP-243].** A security perimeter fence will be implemented early in the construction phase to secure the Order limits and prevent construction activity in proximity to peripheral habitats and retained habitats within the Order limits. The fence will be set back from the retained habitats such as hedgerows, woodlands and watercourses around each area, allowing access around and into adjacent areas. The fence design will include gaps to allow mammals that may use retained habitats, including badger, brown hare and hedgehog, to pass underneath at strategic locations and into and across the Solar PV areas. The space between the fence and the field edges provides space for deer to move within and around the edges of the site, outwith the Solar PV fields. Although deer will not be able to enter into the PV areas once the Scheme is operational, their ability to move through the landscape will not be affected by the Scheme.
RR-152	Concerns that the proposed planting will not be able to establish beneath the solar panels due to a lack of sunlight and water.	New grassland seeding under the solar PV panel areas will be implemented, providing an extensive habitat. These would be classed as 'modified' or 'semi improved' grassland, reflecting the required management and level of shading provided by the panels. Further discussion is set out in the Framework LEMP **[APP-246]** which is secured by requirement 6 in Schedule 2 to the Draft DCO **[AS-008].**
RR-261	Concerns as to how the Wetland Wildlife Zone will be managed.	The Framework LEMP **[APP-246]** sets out the short and long-term measures and practices that will be implemented by the Applicant to establish, monitor, and manage landscape and ecology mitigation and enhancement (BNG) measures embedded in the design. Requirement 6 of the Draft DCO **[AS-008]** requires a Detailed LEMP to be prepared and approved prior to commencement of the development.
RR-200, RR-093 RR-152	Concerns on light pollution from the security lighting and the impact on wildlife.	During construction, works will be restricted to daylight hours to remove the need for artificial lighting, with focussed task-specific lighting provided where this is not practicable, e.g., HDD drilling operations. Outside of core working hours Passive Infrared controlled lights (motion sensors) will be used at construction compounds and at welfare areas. Suitable measures to minimise sky glow, glare and light spillage have been incorporated into the Framework CEMP **[APP-238]**. The Framework OEMP **[APP-239]** sets out the general environmental management principles to be followed in the operation of the Scheme. The provision of a detailed OEMP and implementation of the mitigation measures it contains will be secured through DCO Requirement 18. The lighting strategy will be set out in and implemented through the detailed OEMP and is described in Chapter 2: The Scheme, ES Volume 2 **[APP-054]**. There will be no artificial lighting along the Grid Connection or Interconnecting Cable Corridors. Areas of solar PV panels will not require artificial lighting other than during temporary periods of maintenance and repair, which will be scheduled for daylight hours as far as is practicable.

Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
RR-051	Concerns regarding the impact on the Verge Nature Reserves	Both Wressle Verge LWS and Tottering Lane, Gribthorpe LWS will be impacted, with temporary effects through the installation of interconnecting cables, and permanent access entrances across Tottering Lane and Wressle Verge. Standard environmental protection measures formalised through the Framework CEMP **[APP-238]** includes dust suppression and pollution prevention measures.

Environmental Effects

Table 2-28. Applicant's Responses to Public Relevant Representations relating to Environmental Effects

Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
RR-025, RR-044 RR-047, RR-051 RR-052, RR-075 RR-099, RR-110 RR-112, RR-121 RR-168, RR-189 RR-191, RR-206 RR-236, RR-250 RR-281, RR-358 RR-367	Concerns that the Scheme will have a negative impact on the environment and countryside. Concerns that the Applicant's conclusions that there would be minimal environmental impact are false. Reference is made to the Applicant being held accountable for the proposed environmental mitigations.	Chapters 6: Climate Change **[APP-058]**, 7: Cultural heritage **[APP-059]**, 8: Ecology **[APP-060]**, 9: Flood Risk, Drainage and Water Environment **[APP-061]**, 10: Landscape and Amenity **[AS-014]**, 11: Noise and Vibration **[APP-063]**, 12: Socio-Economics and Land Use **[APP-064]**, 13: Transport and Access **[APP-065]**, 14: Human Health **[APP-066]**, 15: Soils and Agricultural Land **[APP-067]** and 16: Other Environmental Topics of the ES **[APP-068]**, ES Volume 1 summarise the environmental effects of the development. A summary of the cumulative effects can be found within Chapter 17, ES Volume 1 **[APP-069]**. A summary of the effects can be found within Chapter 18: Summary of Environmental Effects **[APP-070]**. In response to these effects, mitigation is set out in the Framework CEMP **[APP-238]**, Framework OEMP **[APP-239]** and Framework DEMP **[APP-240]** and this is secured by Requirements 11, 12 and 18 in Schedule 2 to the Draft DCO **[AS-008]**.
RR-354, RR-140	Concern that the environmental assessments are inadequate and/or incomplete.	The Applicant sought the views of consultees on the information contained within the Environmental Assessment, and there was an opportunity within the process up to submission of the DCO Application for both the EIA and the project design to have regard to comments received.
RR-078	Request for more detailed information on all aspects of the installation process, from start to finish including transport activities, local storage, possible piling activities, concrete batching facilities, working hours, are localised areas to be completed fully, to a pre-determined programme before moving to the next area. The comments note that particular consideration should be given to the residents of Spaldington.	Chapter 2: The Scheme, ES Volume 1 **[APP-054]** provides a description of the Scheme and its location. The physical characteristics of the Scheme are described and the key activities that would be undertaken during construction, operation (including maintenance), and decommissioning are set out. The Order limits are shown on Figure 1-2, ES Volume 3 **[APP-134]** and represent the maximum extent of land to be acquired or used for the construction, operation (including maintenance), and decommissioning of the Scheme. Figure 1-3, ES Volume 3 **[APP-135]** represents the elements of the site.
RR-140, RR-226 RR-317, RR-331 RR-104, RR-201 RR-066, RR-331	Concerns regarding the effect of glare from the solar panels, particularly to vehicles and homes. Comments note that there are local flying club including Breighton Aeroplane Club. Concerns that the effect of glint and glare cannot be properly assessed.	Section 16.3 of Chapter 16: Other Environmental Topics, ES Volume **1 [AS-016]** summarises the potential effects of glint and glare associated with the Scheme on surrounding receptors. The full study on glint and glare, undertaken for the Scheme by Neo Environmental, is available in Appendix 16-2, ES Volume 2 **[APP-122].** The assessment takes into consideration ground-based receptors, including residential, road, railway and PRoW, within 1km of the Order limits and Aviation receptors within 30km. Chapter 16: Other Environmental Topics, ES Volume **1 [AS-016]** notes that The Solar PV Site is only located within the safeguarding buffer zones of Breighton Airfield and Leeds East Airport and therefore these receptors were subject to detailed assessment. Chapter 16: Other Environmental Topics, ES Volume **1 [AS-016]** concludes that the effects of glint and glare and their impact on local receptors has been analysed in detail and there is predicted to be Low impacts at one runway approach path, whilst the remaining aviation receptors are predicted to have No Impacts. Impacts upon ground-based receptors are predicted to be None. Therefore, the overall effects are considered to be Negligible.
RR-037, RR-196 RR-202	Concerns regarding increased pollution caused by construction and operation.	Section 16.2 of Chapter 16: Other Environmental Topics, ES Volume **1 [AS-016]** summarises the potential effects on air quality associated with the Scheme. Measures to reduce the impacts on air quality are provided within the Framework CEMP **[APP-238]**. There is not expected to be any residual effects on air quality associated with the Scheme.

Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
		Section 16.4 of Chapter 16: Other Environmental Topics, ES Volume **1 [AS-016]** summarises the potential effects on ground conditions as a result of the Scheme. Measures to reduce the impacts on ground conditions are provided within the Framework CEMP **[APP-238]**. There is not expected to be any likely significant effects associated with Ground Conditions.

Flood Risk, Drainage and Water Environment

Table 2-29. Applicant's Responses to Public Relevant Representations relating to Flood Risk, Drainage and Water Environment

Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
RR-002, RR-009 RR-029, RR-040 RR-048, RR-051 RR-055, RR-066 RR-073, RR-086 RR-093, RR-098 RR-106, RR-122 RR-125, RR-127 RR-128, RR-144 RR-152, RR-164 RR-174, RR-179 RR-192, RR-200 RR-215, RR-226 RR-257, RR-318 RR-325, RR-331 RR-344, RR-357 RR-360, RR-362	Concerns that the development will exasperate existing flood issues in the area. Comments note that the existing area struggles to absorb water due to clay soils and a high-water table, resulting in existing flooding.	Chapter 9: Flood Risk, Drainage and Water Environment, ES Volume 1 **[APP-061]** presents the assessment of the likely significant effects of the Scheme on surface water bodies (e.g. rivers, streams, ditches, canals, lakes and ponds) including water quality and hydromorphology, flood risk and drainage. A discussion on the existing baseline is set out in section 9.5 of this Chapter; this includes an assessment of the existing geology, soils and watercourses. A Flood Risk Assessment (FRA) has been submitted at Appendix 9-3, ES Volume 3 **[APP-097]**. The FRA presents the flood risk posed to, and from, the development of the Solar PV Site, Interconnecting Cable Corridor; Grid Connection Corridor and Site Accesses from all sources of flooding. It is acknowledged that the majority of the Solar PV Site and Interconnecting Cable Corridor lies in Flood Zone 1, with the north-east corner and small central area of the Solar PV Site in areas of Flood Zone 2 and 3. The FRA **[APP-097]** and supporting assessments and hydraulic modelling confirm that the Scheme, with design mitigation and best practice control measures, will not increase flood risk elsewhere and will remain safe for its lifetime throughout all phases of the Scheme, taking into account climate change. The proposed surface water drainage design (see Framework Surface Water Drainage Strategy, Appendix 9-4, ES Volume 2 **[APP-098]**) demonstrates that SuDS have been designed into the Scheme with agreement from the relevant IDB regarding the location of this drainage design and this is secured by Requirement 9 in Schedule 2 to the Draft DCO **[AS-008]**.
RR-291, RR-066	Concerns refer to the impact of construction compacting of the soil and increased run off from the structures such as the battery containers, concrete supports, foundations, fences and other impervious equipment and design of the panels and their being insufficient drainage.	An FRA has been submitted at Appendix 9-3, ES Volume 3 **[APP-097]**. As part of this assessment, consideration is given to the potential for increased run-off from surrounding land and hard surfaces. The assessment concludes that flood risk to the development from run odd would be Very low (majority), low – high (localised shallow patches). In order to mitigate this impact within the Solar PV Site and Interconnecting Cable Corridor, a Framework Surface Water Drainage Strategy, Appendix 9-4, ES Volume 2 **[APP-098]**) has been prepared. This mitigation is discussed in section 6.2 of the FRA **[APP-097]** and this is secured by Requirement 9 in Schedule 2 to the Draft DCO **[AS-008]**.
RR-192	Concerns that flood risk will be further impacted by increased rain fall.	An FRA has been submitted at Appendix 9-3, ES Volume 3 **[APP-097]**. As part of this assessment, consideration is given to the impact of climate change (Section 3.10 of the FRA). Climate change allowances relate to predicted percentage increase in peak river flows and peak rainfall that the Scheme design must consider. The FRA **[APP-097]** and supporting assessments and hydraulic modelling confirm that the Scheme, with design mitigation and best practice control measures, will not increase flood risk elsewhere and will remain safe for its lifetime throughout all phases of the Scheme, taking into account climate change.
RR-362	Concerns that the development may destroy the historic drainage system.	The Framework CEMP **[APP-238]** includes mitigation measures to avoid impacts on existing utility infrastructure above and below ground as a result of excavation and engineering operations, which include: a. Locating the Scheme outside of utilities protected zones; b. Identification of unknown utilities before excavation (for example by scanning using CAT and Genny); c. Consultation and agreement of construction/demobilisation methods will be undertaken with utility asset owners prior to works commencing; and d. Infrastructure that crosses the Scheme will be mapped and avoided through the design. The Draft DCO **[AS-008]** includes protective provisions for the protection of utility assets. Pre and post construction road condition surveys will also be undertaken at identified locations in consultation with the LHA.

Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
RR-073	Request that a "Percolation Test" Scheme should be commissioned so that the flood risk suitability claims, which are still yet to be communicated, can be validated. The "Percolation Test" Scheme should follow the protocols set out for "Soil Sampling" and should consider the 40 year design life of the Scheme.	The Framework Surface Water Drainage Strategy Appendix 9-4, ES Volume 2 **[APP-098]** provides full details of drainage arrangements and has been developed in consultation with the Ouse and Humber Drainage Board, Solar PV Site is located in their management area. A detailed strategy will be provided post-consent, as secured through Requirement 9 of the DCO **[AS-008]** and following the detailed design of the Grid Connection Substations and informed by infiltration testing.

Human Health

Table 2-30. Applicant's Responses to Public Relevant Representations relating to Human Health

Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
RR-003, RR-018 RR-020, RR-034 RR-039, RR-049 RR-056, RR-060 RR-063, RR-065 RR-066, RR-080 RR-083, RR-098 RR-106, RR-109 RR-110, RR-126 RR-126, RR-137 RR-140, RR-141 RR-144, RR-152 RR-155, RR-157 RR-170, RR-172 RR-190, RR-194 RR-196, RR-198 RR-200, RR-202 RR-231, RR-241 RR-243, RR-245 RR-246, RR-249 RR-252, RR-254 RR-256, RR-259 RR-262, RR-273 RR-278, RR-279 RR-295, RR-330 RR-331, RR-339 RR-342, RR-346 RR-361, RR-375	Concerns regarding the impact on mental health, wellbeing and quality of life resulting from the Scheme, construction, noise and impact on the countryside, loss of walks, poor health, stress and sleep. Concerns regarding exasperating existing health problems. Concerns that residents moved to the area for a better quality of life which will no longer exist. Concerns that the NHS is already strained.	The Applicant recognises that the potential for future environmental changes associated with the Scheme during construction, operation and decommissioning are currently a source of concern for local residents. To address this concern, the Applicant has undertaken a comprehensive and robust Environmental Impact Assessment so that any likely significant effects of the Scheme can be identified and mitigated. Chapter 14: Human Health within the ES **[APP-066]** assesses potential effects of the Scheme on health and wellbeing of local residents. The assessment takes a holistic approach to health and considers a wide range of health determinants which are relevant to quality of life and amenity. The assessment considers elements of the Scheme which could affect mental health (for example changes in landscape and visual amenity, noise, access to open space and employment) as well as physical health (for example associated with air pollution and access to healthcare facilities). No significant adverse effects are identified with regards to human health.
RR-003, RR-083 RR-098, RR-137 RR-140, RR-157 RR-192, RR-241 RR-264	Concerns regarding a reduction in PRoW/ outdoor access and impact on physical and mental health and quality of life.	The Applicant recognises that the potential for future environmental changes associated with the Scheme during construction, operation and decommissioning are currently a source of concern for local residents. To address this concern, the Applicant has undertaken a comprehensive and robust Environmental Impact Assessment so that any likely significant effects of the Scheme can be identified and mitigated. Chapter 14: Human Health within the ES **[APP-066]** assesses potential effects of the Scheme on health and wellbeing of local residents. The assessment takes a holistic approach to health and considers a wide range of health determinants which are relevant to quality of life and amenity. The assessment considers elements of the Scheme which could affect mental health (for example changes in landscape and visual amenity, noise, access to open space and employment) as well as physical health (for example associated with air pollution and access to healthcare facilities). No significant adverse effects are identified with regards to human health. Chapter 12: Socio-economics and Land Use within the ES **[APP-064]** assesses effects of the Scheme on PRoWs. It does not find any evidence that footpaths will be severely compromised. During the construction phase and decommissioning phase, that effects on PRoWs will be negligible. During operation, a minor beneficial effect is expected.

Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
		During construction, no PRoW closures will be required. The PRoW will be buffered from the perimeter fencing, with fencing being installed a minimum distance of 20 m either side of the centre of the PRoW where solar infrastructure lies to both sides (creating a 40 m wide corridor between the fence lines), or 15 m if solar infrastructure is to one side only. There will be a further 5 m from the perimeter fence to the Solar PV panels. HDD will be used where the Grid Connection Corridor crosses the Rivers Ouse and Derwent and so the footpaths at these locations will be unaffected. The other PRoWs crossed by the Grid Connection Corridor and all PRoW which are crossed by the Interconnecting Cable Corridor would only be impacted during the short-term trenching and restoration operations. These PRoWs would remain open (likely managed through traffic management measures) although routes may be slightly diverted temporarily for a short period, for example moving from one side of a road to the other. During operation, no closures or diversions to PRoWs are expected. Permissive Paths to enhance the current PRoW network will be provided as part of the Scheme. During decommissioning there should be no need for any closures of PRoW. In a worst-case scenario, PRoW crossing the Grid Connection or Interconnecting Cable Corridor may be disrupted by traffic management or temporary diversions, but these will be short-term in duration. A Framework PRoW Management Plan **[APP-245]** submitted with the DCO Application, outlines how PRoW (PRoW) will be managed during construction and operation of the Scheme. The measures contained within this document (Section 3.7) will help to ensure the operation of PRoW in the local area in terms of user safety and accessibility. The Framework CEMP **[APP-238],** the Framework OEMP **[APP-239],** and Framework DEMP **[APP-239]** have been prepared which explain the proposed management of PRoW (including diversions) and any PRoW mitigation during the construction, operation and decommissioning of the Scheme, as well as the implementation of permissive routes. Detailed management plans will need to be approved post consent prior to construction by the relevant local authorities. These detailed management plans must substantially accord with the framework management plans and this is secured by a requirement in Schedule 2 to the Draft DCO **[AS-008].**
RR-013, RR-020 RR-096, RR-109 RR-198	Concerns regarding the health impacts on residents from field stations and other equipment. Concerns regarding the unknown health consequences from solar development.	The assessment of potential effects on Human Health as presented in Chapter 14: Human Health **[APP-065]**, ES Volume has been carried out against a benchmark of current Human Health baseline conditions prevailing around the Scheme. The impacts of the Scheme on Human Health are assessed qualitatively using professional judgement, best practice, and drawing upon other assessments within the ES. In general, Field Stations will be located at least 250 m from residential properties. The exception to this is a specific exclusion area for a sensitive receptor in Spaldington which is greater.
RR-285	Concerns regarding the response of the Applicant to the medical needs of residents in the area. The comments note that these needs could have been addressed with relatively minor amendments to the proposals.	Following the Statutory Consultation, the Applicant's design team considered the feedback provided to this consultation period as well as feedback provided through ongoing engagement with key consultees. Table 3-3 of Chapter 3: Alternatives and Design Evolution, ES Volume 1 **[APP-055]** discusses the evolution of the Order limits and main design layout iterations for the Solar PV Site. The assessment of potential effects on Human Health as presented in Chapter 14: Human Health **[APP-065]**, ES Volume has been carried out against a benchmark of current Human Health baseline conditions prevailing around the Scheme. The impacts of the Scheme on Human Health are assessed qualitatively using professional judgement, best practice, and drawing upon other assessments within the ES.

Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
RR-140	Concerns regarding exposure to electromagnetic radiation (EMR) which can affect the health of humans and animals.	Section 16.8 of Chapter 16: Other Environmental Topics **[AS-016]** summarises the effects of the Scheme on Electric and Electro-Magnetic Fields. No overhead electricity cables will be used or constructed as part of the Scheme. With the exception of relatively short lengths of Onsite Electrical Cabling (also known as distribution cabling) connecting the solar panels and the inverters (which is typically above ground level and fixed to the mounting structure, or to other parts of nearby components), all cables will be buried underground. The Chapter concludes that no significant effects to residential receptors, PRoW or to migratory fish species using the River Ouse or River Derwent are predicted to occur.

Cultural Heritage

Table 2-31. Applicant's Responses to Public Relevant Representations relating to Cultural Heritage

IP Name	Comments from Relevant Representations	Response to Relevant Representation
RR-034, RR-037	Concerns regarding the impact on the Ancient landscape with reference to the Iron Age Hasholme Boat found near the river Foulness close.	Chapter 7: Cultural Heritage, ES Volume 1 **[APP-059]** presents the findings of an assessment of the likely significant effects on Cultural Heritage as a result of the Scheme. Appendix 7-2: Cultural Heritage Desk-Based Assessment **[APP-080]** presents a desk-based assessment (DBA), which sets out the cultural heritage baseline conditions for the land within the Order limits and defined Study Area; including an assessment of the Historic Landscape Character in Section 4.4. Chapter 10: Landscape and Visual Amenity **[AS-014]** presents the findings of an assessment of the likely significant effects on Landscape and Visual Amenity as a result of the Scheme.
RR-064, RR-201	Concerns regarding the effect on the setting of heritage assets which derive from their rural setting with reference to Wressle Castle (English Heritage). The comments note that local planning policies state that proposals affecting a heritage asset, or its setting, should protect or enhance those features which contribute to its special architectural or historic interest.	Chapter 7: Cultural Heritage, ES Volume 1 **[APP-059]** presents the findings of an assessment of the likely significant effects on Cultural Heritage as a result of the Scheme. The assessment considers both the impact on the physical fabric of a heritage asset or result in changes that affect its setting. As assessment of the effects on Wressle Castle is discussed in paragraphs 7.7.32 to 7.723 of this Chapter. The assessment concludes that the magnitude of impact is assessed to be very low which, on an asset of high value would result in a minor adverse effect, which is not significant.

Landscape and Visual Amenity

Table 2-32. Applicant's Responses to Public Relevant Representations relating to Landscape and Visual Amenity

Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
RR-005, RR-009 RR-011, RR-012 RR-014, RR-017 RR-018, RR-019 RR-020, RR-021 RR-022, RR-024 RR-026, RR-028 RR-029, RR-030 RR-034, RR-039 RR-040, RR-045 RR-048, RR-049 RR-050, RR-051 RR-055, RR-056 RR-058, RR-063 RR-064, RR-065 RR-066, RR-068 RR-070, RR-073 RR-075, RR-076 RR-077, RR-080 RR-081, RR-083 RR-084, RR-085 RR-092, RR-093	Concerns regarding the visual impact of the development resulting from the size and scale of the Scheme. Concerns regarding the impact on the countryside, loss of rural setting and industrialisation of the area particularly from important views such as homes and PRoW.	Chapter 10: Landscape and Visual Amenity **[AS-014]** presents the findings of an assessment of the likely significant effects on Landscape and Visual Amenity as a result of the Scheme. The Applicant has sought to minimise harm to the landscape and reduce adverse visual effects. This has been achieved through a carefully designed Scheme which generates a large amount of renewable electricity, using single axis tracker solar technology, whilst also responding to its local context, integrating the Scheme into its landscape setting. Landscape character is made up of a number elements as set out in section 5.4 of Guidelines for Landscape and Visual Impact Assessment (GLVIA3), and not all those elements are being removed or changed as a result of the Scheme. The Scheme will result in limited and localised adverse landscape and visual effects which will reduce over the period of its operation and will be reversible. The Scheme will result in the introduction of incongruous, industrial features that would change the overall landscape character which will result in adverse landscape effects that will reduce over the period of its operation and will be reversible. Land use would change from agricultural fields to areas of Solar PV Panels. Key landscape characteristics which contribute to landscape character including hedgerows, hedgerow trees and longer distance views would be retained, where possible. As reported in the ES Chapter 15: Soils and Agricultural Land **[APP-067]**, there is a slight beneficial (non-significant) effect associated with the conversion of arable to grassland during the operational stage, which has potential to accrue improvement to soil structure and function over a major area during the Scheme's operation. The decommissioning phase will return the Order limits to the landowner, available for agricultural use. As such, it is noted that an element of professional judgement has been applied. For example, within the Solar PV Site soil function will be enhanced long-term by the withdrawal of cultivation as recognised in ES Table 15-24 (ES Chapter 15: Soils and Agricultural Land **[APP-067]**).

Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
RR-094, RR-096 RR-098, RR-099 RR-104, RR-105 RR-106, RR-109 RR-110, RR-111 RR-112, RR-115 RR-116, RR-120 RR-122, RR-125 RR-127, RR-129 RR-136, RR-137 RR-138, RR-140 RR-145, RR-147 RR-152, RR-154 RR-156, RR-157 RR-158, RR-159 RR-168, RR-171 RR-173, RR-177 RR-178, RR-179 RR-190, RR-193 RR-198, RR-200 RR-201, RR-202 RR-210, RR-213 RR-215, RR-217 RR-218, RR-219 RR-220, RR-221 RR-222, RR-224 RR-225, RR-226 RR-230, RR-231 RR-234, RR-239 RR-241, RR-245 RR-246, RR-249 RR-250, RR-252 RR-253, RR-254 RR-255, RR-256 RR-257, RR-259 RR-261, RR-262 RR-263, RR-264 RR-268, RR-269 RR-272, RR-273 RR-274, RR-275 RR-278, RR-280 RR-281, RR-285 RR-291, RR-294 RR-295, RR-297 RR-298, RR-299 RR-300, RR-301 RR-302, RR-303 RR-304, RR-307		This functional gain would be reversed if arable cultivations were resumed. Whilst this benefit is extensive (>20ha) and could therefore be considered a major benefit to BMV land, the magnitude of the impact has been moderated by professional judgement and recognised as 'minor to moderate'. This moderation, such that a reversible benefit is not overstated applies the principles of the IEMA guidelines to reversible change.

Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
RR-308, RR-309 RR-311, RR-312 RR-316, RR-317 RR-321, RR-325 RR-326, RR-327 RR-329, RR-330 RR-333, RR-334 RR-336, RR-338 RR-344, RR-345 RR-346, RR-348 RR-350, RR-351 RR-354, RR-356 RR-358, RR-359 RR-362, RR-364 RR-365, RR-368 RR-372, RR-375		
RR-065, RR-077 RR-097	Concerns regarding the loss of existing vegetation and that the proposed screening would be inadequate due to its size, type etc. Concerns that there would be insufficient offsets from residential properties.	The layout of the Scheme has been designed to minimise the loss of, and avoid significant impacts on, existing landscape features, where possible. This includes minimum offsets of: a. 15 m from woodlands (noting there is no ancient woodland within or adjacent to the Site); b. 10 m from hedgerows increasing to 15 m where there are hedgerow trees; c. 15 m from individual trees; d. 10 m from ditches and drains (except where crossed by cables); e. 30 m from Rivers Ouse and Derwent; and f. 10 m from existing ponds. The above offsets are also described in the Framework CEMP **[APP-238].** The layout of the Scheme will use existing farm tracks and field openings as the preferred routes for construction access, minimising loss of hedgerows, where possible. The indicative Grid Connection Cable and Interconnecting Cable routes have been designed to minimise disturbance of existing vegetation, where practicable. Where selective vegetation removal is required, replacement planting will be reinstated, where practicable. The proposed planting design responds to the varied character of the landscape within the Site and seeks to allow key views to remain open, where practicable. Details of the proposed screening and buffers including existing vegetation to be retained and proposed planting are provided in the Framework LEMP **[APP-246]** and illustrated on the Framework Landscape Masterplan included as Appendix A of the Framework LEMP **[APP-246]** and Section 5.4 of the DAS **[APP-234].** Existing hedgerows will be retained as far as practicable. Buffers of grassland, native scrub, woodland and traditional orchard will be created around the edge of the Solar PV Areas and other larger areas of grassland will be created, which will offer habitat for wildlife.

Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
		Offsets from properties and local roads within proximity to the Solar PV Areas respond to the existing character of views, or where views and open character contribute to the setting of local villages. Where longer views from sensitive receptors are available, wider offsets have been afforded. Chapter 10: Landscape and Visual Amenity **[AS-014]** presents the findings of an assessment of the likely significant effects on Landscape and Visual Amenity as a result of the Scheme.
RR-065	Comments note that solar panels should be at least 500m from properties.	Offsets from properties and local roads within proximity to the Solar PV Areas respond to the existing character of views, or where views and open character contribute to the setting of local villages. Where longer views from sensitive receptors are available, wider offsets have been afforded. Chapter 10: Landscape and Visual Amenity **[AS-014]** presents the findings of an assessment of the likely significant effects on Landscape and Visual Amenity as a result of the Scheme.
RR-152, RR-183 RR-196, RR-226 RR-230, RR-246 RR-257, RR-317	Concerns regarding the loss of tranquillity.	Construction vehicle movements and plant machinery will result in a small-scale reduction in the sense of tranquillity. This will reduce as construction progresses. Further discussion is set out in Chapter 10: Landscape and Visual Amenity, ES Volume 1 **[AS-014].**
RR-012, RR-044 RR-083, RR-093 RR-144, RR-152 RR-164, RR-190 RR-219, RR-253 RR-254, RR-264	Concerns regarding the impact of light pollution and impact on dark skies.	The proposed lighting is set out in Section 10 of Chapter 10: Landscape and Visual Amenity, ES Volume 1 **[AS-014]** and also described in the Framework CEMP **[APP-238]**, Framework OEMP **[APP-239]** and Framework DEMP **[APP-240]**. Potential adverse impacts on landscape and visual amenity as a result of lighting during construction and operation of the Scheme has been minimised through considered design and the measures set out in the documents above. Therefore, adverse impacts as a result of the Scheme's lighting are considered to be mitigated and an assessment of lighting on landscape and visual amenity has not been undertaken.
RR-040, RR-325 RR-338, RR-362	Concerns regarding the loss of ancient woodland and old oak trees.	The layout of the Scheme has been designed to minimise the loss of, and avoid significant impacts on, existing landscape features, where possible. This includes minimum offsets of: a. 15 m from woodlands (noting there is no ancient woodland within or adjacent to the Site); b. 10 m from hedgerows increasing to 15 m where there are hedgerow trees; c. 15 m from individual trees; d. 10 m from ditches and drains (except where crossed by cables); e. 30 m from Rivers Ouse and Derwent; and f. 10 m from existing ponds. The above offsets are also described in the Framework CEMP **[APP-238].** Further discussion is set out in Chapter 10: Landscape and Visual Amenity, ES Volume 1 **[AS-014].**
RR-280, RR-302 RR-321	Concerns regarding the future maintenance of hedgerows, landscaping, trees and buffers. Concerns also noted that any maintenance should also minimise the effects on habitats e.g. for birds nesting and forage.	The Framework LEMP **[APP-246]** provides a framework for delivering the landscape strategy and the successful establishment and future management of proposed landscape works associated with the Scheme. It sets out the short and long-term measures and practices that will be implemented by the Applicant to establish, monitor and manage landscape and ecology mitigation and enhancement (biodiversity net gain) measures embedded in the design. The latter will be achieved through habitat creation over and above that used for habitat mitigation. Updated species surveys, including but not limited to bats, breeding and non-breeding (wintering) birds, otter, water vole and badger, would be completed as appropriate to re-confirm the status of protected species identified, to support protected species licence applications, if required. Further details are set out in the Framework CEMP **[APP-238].** A detailed CEMP will be provided as required by requirement 11 of the Draft DCO **[AS-008].**

Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
RR-352	Concerns that tree planting may result in overshadowing of properties and limit access to a water supply which runs beneath the land.	The locations of proposed woodland, woodland edge and shrubs with individual trees are illustrated on Appendix A Landscape Masterplan of the Framework LEMP **[APP-246]**. Areas of proposed tree planting will be set away from the boundary of residential properties and potential impacts arising as the planting matures has been taken into consideration in the siting of these areas. A more detailed review will be undertaken when the detailed landscape planting scheme is developed, and specific species are identified. The Framework LEMP sets out details of the long term maintenance of the planting. It states that all woodland, woodland buffer and native tree belt planting plots will undergo an annual condition assessment and an appropriate programme of works developed to address changes in condition and site requirement.
RR-040, RR-073 RR-116, RR-138 RR-157, RR-187 RR-279	Concerns regarding the impact on residential amenity including overlooking.	One of the Scheme's design objectives is to ensure the design responds sensitively to residential properties in proximity to the Scheme regarding visual impact, noise, and lighting. As discussed in ES Chapter 2: The Scheme **[APP-054]** and the DAS **[APP-234]** the Scheme is not proposing any visible lighting from CCTV or artificial lighting for security purposes during operation. The CCTV will use thermal imaging and Infrared (IR) lighting to provide night vision functionality. This is secured in the Outline Design Principles Statement **[APP-235].** The CCTV cameras will have fixed, inward-facing viewsheds and will be aligned to capture only the perimeter fence and the area inside the fence, which will not capture publicly accessible areas or any residential curtilages and thereby not resulting in a loss of privacy for any nearby residential occupiers.

Planning

Table 2-33. Applicant's Responses to Public Relevant Representations relating to Planning

Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
RR-002, RR-011 RR-014, RR-021 RR-041, RR-053 RR-084, RR-170 RR-175, RR-223 RR-248, RR-273 RR-279, RR-315 RR-316, RR-325 RR-347	Concern about the need for the Scheme.	The Government has identified through its energy policy, most recently in the Overarching National Policy Statement for Energy EN-1 and National Policy Statement for Renewable Energy EN-3, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's Statement of Need **[APP-232]**, this includes low carbon energy generation using solar technology. Developing the Scheme at its proposed size will therefore be an important contribution to meeting this need. The Scheme design is the result of an iterative design process which delivers the Scheme's functionality, the generation of a large amount of renewable electricity using single axis tracker solar technology, whilst addressing the local context and setting within which it is located. The Applicant's design team has worked collaboratively to provide an integrated and responsive design which has been informed by the process of environmental impact assessment, statutory consultation and stakeholder engagement. As set out in the DAS **[APP-234]** design objectives have guided the design response from an early stage to develop a good design that balances the need to maximise renewable energy generation from the Scheme, whilst minimising potential adverse impacts and providing mitigation and enhancement measures where practicable. This has resulted in a Scheme which, with the implementation of mitigation, avoids residual significant adverse effects in relation to designated landscapes; biodiversity sites; protected species or habitats; agricultural land; heritage assets; flood risk; water quality; access; and land uses within the Howden area. Impacts on the local area have therefore been minimised as far as practicable. The Applicant acknowledges that the operation of the Scheme will result in residual significant adverse effects upon the local landscape character and a small number of visual receptors, as presented in the Landscape and Visual Amenity Assessment within the ES **[AS-014]**. However, the Applicant has carefully designed the Scheme to ensure landscape and visual impacts are minimised as far as practicable by proposing a comprehensive landscape and ecological design and increased connectivity and local access through the landscape as discussed in the DAS **[APP-234]** and in the Framework LEMP **[APP-246]**. Both documents include the Framework Landscape Masterplan illustrating this design.
RR-004, RR-095 RR-143, RR-166 RR-171, RR-188 RR-202, RR-213 RR-223, RR-225 RR-269, RR-342 RR-350, RR-351 RR-358	Concerns that the benefits of the Scheme do not outweigh the harm caused.	The Government has identified through its energy policy, most recently in the Overarching National Policy Statement for Energy EN-1 and National Policy Statement for Renewable Energy EN-3, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's Statement of Need **[APP-232]**, this includes low carbon energy generation using solar technology. Developing the Scheme at its proposed size will therefore be an important contribution to meeting this need. The environmental impacts of the Scheme have been assessed as reported in the ES and are discussed in the Planning Statement **[APP-233]**. Overall, with appropriate mitigation implemented, the Scheme is expected to have limited and localised residual significant adverse effects during its 40 year operation when considered relative to the large scale nature of the Scheme. These effects are therefore considered to be outweighed by the significant national benefits that the Scheme will provide. In summary, the Scheme has a vital role to play in the UK's urgent response to tackle climate change. The Scheme is critical and will make a timely contribution to the decarbonisation, affordability and security of UK's energy supply. Any potential residual significant environmental effects are outweighed by the benefits of the Scheme, the contribution towards meeting the energy need being one of these key benefits.

Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
		There are no policies which clearly indicate that consent should be refused. The Scheme is therefore in compliance with the relevant national and local policies relating to the need for, and provision of, renewable energy infrastructure. Helping meet this established urgent need should weigh substantially in favour of the DCO being granted.
RR-235	Policy compliance of the Scheme against the Energy NPSs were questioned.	Appendix A of the Planning Statement **[APP-233]** assesses the Scheme's compliance with both the adopted and Draft NPS EN-1, EN-3 and EN-5 documents. Appendix A of the Applicants Response to the Examining Authorities Written Questions which sets out a detailed assessment of the Scheme's compliance with the policies in the Overarching NPS for Energy EN-1, National Policy Statement for Renewable Energy EN-3 and National Policy Statement for Electricity Networks Infrastructure EN-5 which were designated on 17th January 2024. This is submitted at Deadline 1.
RR-010, RR-026 RR-042, RR-043 RR-044, RR-054 RR-067, RR-072 RR-092, RR-141 RR-143, RR-144 RR-164, RR-181 RR-184, RR-186 RR-189, RR-214 RR-248, RR-305 RR-316	General opposition to the Scheme.	The Government has identified through its energy policy, most recently in the Overarching National Policy Statement for Energy EN-1 and National Policy Statement for Renewable Energy EN-3, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's Statement of Need **[APP-232]**, this includes low carbon energy generation using solar technology. Developing the Scheme at its proposed size will therefore be an important contribution to meeting this need.
RR-015, RR-030 RR-031, RR-119 RR-124, RR-228 RR-289, RR-321	General support for the Scheme.	This is welcomed.
RR-216	Concerns that the approval of the development would set a precedent for further solar and wind development within the area.	Each application would be assessed on its merits in accordance with the relevant National Policy Statements and other guidance and legislation.
RR-002, RR-072	Concern that there is insufficient infrastructure to support the Scheme.	As set out in the Grid Connection Statement **[APP-236]** a grid connection offer (a Bilateral Embedded Generation Agreement (BEGA)) to the Applicant and Eclipse was originally received on 17 December 2021 and this was accepted by the Applicant and Eclipse on 12 April 2022. National Grid has confirmed that the grid connection location for the Scheme will be at Drax Substation. All works to the National Grid Drax Substation to accommodate the Scheme connection would be undertaken by National Grid and are anticipated to include the installation of a transformer and associated infrastructure which will convert the 132 kV electricity supplied by the Scheme to 400 kV to facilitate the efficient transmission of power onto the electricity transmission network. All infrastructure within the National Grid Drax Substation would remain under National Grid's control.
RR-013	Concern that allowing new public access also restricts the management of remaining land for pest control purposes, a necessity for remaining agricultural use.	A Biosecurity Plan will be produced prior to construction which will set out procedures to ensure that no invasive non-native species (INNS) are brought onto the Site, exported out of the Site or spread within it, and will be secured within the Framework CEMP **[AS-008]**. In the event that any future infestations of INNS are identified prior to and or during the development process, exclusion zones will be established around them, and a suitably qualified ecologist contacted for advice as required. Site / species specific method statements (or similar will be prepared as required).

Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
		Ongoing monitoring of habitats and species will be undertaken throughout construction, over seen by an appointed Ecological Clerk of Works of suitable qualifications and experience, or in charge of a team of appropriately qualified ecologists. The Ecological Clerk of Works will have the appropriate authority to oversee works and recommend action as appropriate, including temporarily stopping works where non-compliant working is observed, for example to safeguard protected species and their habitats, or where any other breaches of environmental legislation are likely to occur.
RR-104	Concern that other planning applications for residential extensions and new dwellings have been refused due to their impact on character and traffic.	Each application is assessed on its own merits against the relevant local and national policy and with consideration to the site context.
RR-105, RR-200	Concerns that the local bio-gas plant will have nowhere to dispose of its product currently spread on all this land.	There is no requirement under the original Planning Permission (Reference DC/17/03450) for the Anaerobic Digestion Plant for the product to be spread within the Site.
RR-116	Concerns regarding the effects on horses with reference to the British Horse Society.	Permissive paths to enhance connectivity of the current PRoW network will be provided as part of the Scheme. These will be available during the operational stage of the Scheme. Two indicative routes are shown on Figure 2-3, ES Volume 3 **[APP-138].** The first proposed permissive path is a continuation of the permissive path allowing travel on horses SPALB08 which currently terminates at Johnson's Farm (the site of the Operations and Maintenance Hub). This is proposed to also allow travel on horses in response to feedback from the ERYC's PRoW team. The proposed permissive path runs northwards for approximately 340 m until it connects with the second proposed permissive path. The second proposed permissive path runs eastwards from footpath SPALF14, connecting with the first permissive path and continuing eastwards to the edge of the grassland habitat created in the east of Solar PV Area 1e. The path would be approximately 1.4 km in length. From discussions with ERYC's PRoW Team it is proposed that the section from SPALF14 to the connection with the first permissive path will allow travel on horses. From the point where the two permissive paths meet, heading westwards it is anticipated that the route (approximately 250 m in length) will be a permissive path (i.e. a footpath). The new routes will connect to and link existing PRoW to provide a new circular route. Sections of both paths allow travel on horses and therefore meet ERYC's aspirations for the provision of recreational routes for equestrian users.
RR-014, RR-170	Concern that landowners have more power than the local community.	The Applicant carried out three rounds of consultation during the pre-application period ahead of finalising its proposals for the Scheme. At statutory and targeted consultations, a full suite of consultation documents was provided to aid stakeholders in their understanding of the Scheme. This included figures and plans of the Site Boundary, Site Elements and Scheme Location Plan, in addition to a brochure, which have outlined where the proposed Scheme, including the underground cabling, would be located. The Applicant also encouraged contact with the project team during the statutory and targeted consultations via email, freephone and Freepost to answer any queries or questions which were not answered at consultation events or covered within the consultation material. All responses received to the statutory consultation and the Applicant's response to these can be found in Appendix P in Consultation Report Appendices **[APP-041 to APP-045].**

Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
RR-272, RR-368	Concern that Gribthorpe has been described as a farm and not a village of 18 houses.	As set out in Chapter 2: The Scheme of the ES **[APP-054]**, and the Planning Statement **[APP-233]** the surrounding area of the Order limits includes "*several small rural villages and hamlets including Gribthorpe, Willitoft, Spaldington, Brind and Wressle and the market town of Howden".*
RR-234	Concern that the application is too large to be considered within one application.	DCOs are the process for obtaining planning permission for National Significant Infrastructure projects which include projects of a particular scale. The DCO process involves public consultation, examination by an independent panel, and a final decision by the relevant government minister.
RR-051	Concerns as to whether National Grid will accept the connection when the Scheme is completed.	The Applicant has secured a connection to the National Grid via a new below ground grid connection cable located within the Grid Connection Corridor. This will connect the new on-site Substation with the existing National Grid Drax Substation. The grid connection offer (a BEGA) to the Applicant and Eclipse was originally received on 17 December 2021 and this was accepted by the Applicant and Eclipse on 12 April 2022. Further details are included in the Grid Connection Statement **[APP-236].**
RR-313	A request that once the plan is complete if approved can it be confirmed that no alterations will be approved without re-starting the process.	The Planning Act 2008 includes a provision for making changes to a DCO once determined. There are separate procedures for handling applications for non-material and material changes to DCOs.
RR-333	Concern about the use of land when the population is growing.	The Applicant acknowledges that agricultural land will be used for the Scheme. Agricultural land quality was a consideration of the Applicant's site selection process as described in Chapter 3: Alternatives and Design Evolution within the ES **[APP-055]**. The Scheme is located mostly on lower quality agricultural land, with the majority of the Scheme being on land not classed as BMV. For the Solar PV Site, 92.8% of the land used is non BMV land. The Applicant's discussions with farmers who farm areas of the Solar PV Site have also identified that this land is difficult to farm. In accordance with NPS EN-1 paragraph 5.11.3 and NPS EN-3 paragraph 2.10.29 the Applicant considered the use of previously developed land and did not identify any available land within its area of search of an appropriate size to locate the Scheme. In accordance with NPS EN-1 paragraph 5.11.12 and NPS EN-3 paragraphs 2.10.29 to 2.10.34 the Applicant has taken a sequential approach to the use of agricultural land considering whether land of lower grade is available and suitable. Following the identification of an area of search derived from the point of connection at the National Grid Drax Substation the Applicant did not identify any alternative sites which would be of lower grade agricultural land (compared to the majority of the Order limits) that were available or considered suitable for the Scheme and its objectives. The vast majority of agricultural land within the Order limits would also be available for return to its existing agricultural use following decommissioning of the Scheme. Chapter 15: Soils and Agricultural Land within the ES **[APP-067]** concludes that a very small amount (0.41 ha) of BMV Subgrade 3a agricultural land for tree planting would be permanently removed from agricultural use but would provide a permanent ecological benefit. In relation to non-BMV land, 8.97 ha of Subgrade 3b agricultural land would be permanently removed from agricultural use as a result of tree and hedge planting, and further 2 ha of Subgrade 3b agricultural land would be permanently removed as a result of the potential retention of the Grid Connection Substations and associated accesses. In addition, the conversion of arable land to grassland during the 40 year operational period has the potential to accrue improvement to soil function over a large area.
RR-333	Concern that the Scheme will not reduce energy costs.	The Applicant is committed to making a positive and significant impact on climate change and the achievement of the UK Government's aim for a fully decarbonised, reliable and low-cost power system and net zero emissions by 2050.

Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
RR-321	Concern that people who live or run businesses within the affected zone, should not have the extent of the solar farm built right up to the edges of their properties.	One of the Scheme's design objectives is to ensure the design responds sensitively to residential properties in proximity to the Scheme regarding visual impact, noise, and lighting. This design approach is in accordance with paragraph 5.10.22 of NPS EN-1. As set out in paragraph 4.1.10 of the Framework LEMP **[APP-246]**, Visual effects for residential receptors have been reduced by: a. Hedgerow enhancement where existing hedgerows are gappy and allow for open views across Solar PV Areas; b. New native hedgerows with trees on boundaries where there are no boundary features; c. Solar PV Areas set back from public highways by a minimum of 5 m; d. Solar PV Panels within Solar PV Area 1b set back from the road behind an area of scrub with trees and a wide margin (approximately 100 m width) of species-rich grassland, which screens views for road users and retains longer views on the approach to Gribthorpe whilst also providing habitat for skylarks; e. Solar PV panels within the south-western part of Solar PV Area 1a set back from properties behind an area of species-rich grassland and hedgerow with trees (approximately 100 m long) which screens views from the properties at Crossroad Cottages at the junction with Willitoft Road and Wood Lane; and f. Solar PV Panels within Solar PV Area 2e set back from properties at the south of Spaldington by a wide margin of species-rich grassland, orchard tree planting and linear woodland planting (approximately 150 m) which screens views from the properties. These buffers are shown in the Framework Landscape Masterplan (Appendix A of the Framework LEMP **[APP-246]**). The Framework LEMP **[APP-246]** is secured through Requirement 6 of the Draft DCO **[AS-008]**.
RR-044, RR-214	Concerns about the impact to livestock.	The Applicant commissioned an independent consultant to review the feasibility of sheep grazing on the grassland beneath solar panels, which has shown it is feasible for sheep to graze on the land. More detail is contained within the Grazing Feasibility Study, Appendix 2-1, ES Volume 2 **[APP-071].** With regard to weed management, grazing by sheep is the Applicant's preferred option for the management of the grassland created within the solar farm. Should grazing not be possible in some or all areas of the Solar PV Site, grassland will instead be managed by mowing as secured in the Framework OEMP **[APP-238]** which is secured in the Draft DCO **[AS-008].** The flock would be of a suitable size for the land available, rotated as required to ensure that no areas were over-grazed and that the land being currently grazed was sufficiently dry to support them thereby avoiding potential damage to soil structure. The provision of shade within animal husbandry has recognised welfare benefits. The Applicant is engaged with farmers who are directly impacted by the Scheme. Wool would represent a minor product of sheep farming. As grazing achieves an essential maintenance function (maintaining the grass at a low level) without the need for/cost of machinery, it is possible for solar farms to use less agriculturally productive breeds (such as heritage breeds) and to graze at low densities. The agricultural business model for grazing would be around the provision of vegetation management services in combination with the sale of fleece, meat or other products. The current landowners may not have sheep husbandry skills, but these can be developed, or other shepherds may wish to rent the land to keep and expand their own sheep enterprises. Sheep grazing can help to maintain the land in agricultural use and help to diversify farming in the area adding much needed security for farmers during challenging economic times.

Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
		Sheep grazing on solar PV facilities is successfully used in the UK and carries with it multiple benefits such as soil health improvement and biodiversity enhancement. Sheep can move safely between and under the solar PV panels, and shelter under them from sun or rain. It is noted that the use of single axis tracker panels is not yet typical in the UK, however it is known from schemes elsewhere in the world (e.g., Australia and the USA) that the use of tracker technology does not influence grazing. The panels would be at a minimum height above ground level of approximately 1 m at maximum tilt with greater clearance during the rest of the day. Therefore, grazing will not be limited by the panels themselves. Framework LEMP **[APP-246]** (secured in Schedule 2 of the Draft DCO **[AS-008])** includes consideration of grazing densities to avoid overgrazing and to achieve ecological enhancement under the solar PV panels. Buffers are provided at the edges of the Site to prevent livestock from accessing the Solar PV Area. Details of the proposed screening and buffers including existing vegetation to be retained and proposed planting are provided in the Framework LEMP **[APP-246]** and illustrated on the Framework Landscape Masterplan included as Appendix A of the Framework LEMP **[APP-246]** and Section 5.4 of the DAS **[APP-234].** Existing hedgerows will be retained as far as practicable. Buffers of grassland, native scrub, woodland and traditional orchard will be created around the edge of the Solar PV Areas and other larger areas of grassland will be created, which will offer habitat for wildlife.
RR-105, RR-122 RR-127, RR-191 RR-202, RR-231 RR-311, RR-335	Concerns that the development will impact on the local communities.	As set out in the DAS **[APP-234]** design objectives have guided the design response from an early stage to develop a good design that balances the need to maximise renewable energy generation from the Scheme, whilst minimising potential adverse impacts and providing mitigation and enhancement measures where practicable. This has resulted in a Scheme which, with the implementation of mitigation, avoids residual significant adverse effects in relation to designated landscapes; biodiversity sites; protected species or habitats; agricultural land; heritage assets; flood risk; water quality; access; and land uses within the Howden area. Impacts on the local area have therefore been minimised as far as practicable. The Applicant acknowledges that the operation of the Scheme will result in residual significant adverse effects upon the local landscape character and a small number of visual receptors, as presented in the Landscape and Visual Amenity Assessment within the ES **[AS-014]**. However, the Applicant has carefully designed the Scheme to ensure landscape and visual impacts are minimised as far as practicable by proposing a comprehensive landscape and ecological design and increased connectivity and local access through the landscape as discussed in the DAS **[APP-234]** and in the Framework LEMP **[APP-246]**. Both documents include the Framework Landscape Masterplan illustrating this design.

Funding

Table 2-34. Applicant's Responses to Public Relevant Representations relating to Funding

Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
RR-051, RR235, RR-261, RR-321 RR-353	Queries about whether the Applicant has the finances to see this Scheme through. Queries on the general management and operation of the Scheme. Queries about whether the viability of the Scheme will be scrutinised.	The Funding Statement **[APP-022]** provides details on how the Scheme is and will continue to be funded. The Applicant has appointed a number of professional advisors in connection with the development of the Scheme, including solicitors, project managers and technical consultants, all of whom have extensive experience of working within projects similar to the Scheme. Having taken and assessed the advice of these professional advisors the Applicant is confident that the Scheme is commercially viable and will be funded, if development consent is granted. Details on how the Scheme would be managed and operated are set out within the OEMP **[APP-239]** which is secured by Requirement 12 of the Draft DCO **[AS-008]**.
RR-057, RR-058 RR-072, RR-318 RR-360	Requests for tangible benefit to local residents impacted. Reduced electricity bills and full fibre broadband have been suggested.	The Applicant is exploring the use of a community benefit fund as part of the Scheme and aims to work with local organisations that will best spend the money to support the community. During Statutory Consultation, responses were sought on causes which the fund might support. There may be opportunities to fund projects which have a specific focus on education or skills, or which inform young people, workers, local residents and visitors about the Scheme more generally. The criteria for the allocation of funding has not yet been set and the Applicant welcomes these suggestions.
RR-073	Concern that the development is not viable without subsides.	The submitted Funding Statement **[APP-022]** provides details on how the Scheme is and will continue to be funded.
RR-261	Concerns that East Yorkshire Solar Farm Limited (the Applicant) is not a UK company and that their objectives purely financially motivated under the banner of the UK government's Green Initiative.	The Applicant (East Yorkshire Solar Farm Limited) is a UK registered company and a wholly owned subsidiary of BOOM Developments Limited, which is also a UK registered company. BOOM specialise in non-subsidised solar and battery storage projects. The BOOM Managing Director and team have been responsible in previous roles for constructing more than 700 MW of solar developments in the UK between 2015 and 2017 and developing more than 850 MW of solar projects, including the UK's first NSIP solar PV project Cleve Hill which was granted a development consent order in 2020. In 2021, the UK based BOOM, partnered with the Pelion Green Future group of companies based across Australia, America and the European mainland. The Applicant is committed to making a positive and significant impact on climate change and the achievement of the UK Government's aim for a fully decarbonised, reliable and low- cost power system and net zero emissions by 2050.

Safety

Table 2-35. Applicant's Responses to Public Relevant Representations relating to Safety

Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
RR-019, RR-034 RR-055, RR-064 RR-066, RR-081 RR-096, RR-106 RR-112, RR-126 RR-130, RR-136 RR-141, RR-144 RR-152, RR-154 RR-164, RR-196 RR-209, RR-219 RR-226, RR-254 RR-271, RR-273 RR-330, RR-336 RR-357, RR-367	Concerns relating to an increase in crime and theft of equipment, copper and solar panels. Reference is made to police numbers already being low in the area. Reference is made the Scheme bringing organised crime groups to the area.	The Scheme incorporates fencing and security design measures which will mitigate against the risk of criminal activity. This includes internal facing CCTV systems which use infra-red technology avoiding the need for lighting. These will be installed around the perimeter of the operational areas of the Solar PV Site. These measures are described in Chapter 2: The Scheme of the ES **[APP-054]**. Details of all proposed fencing must be approved in advance by the local planning authority, in accordance with Requirement 8 of Schedule 2 of the Draft DCO.
RR-029, RR-103 RR-185, RR-225 RR-243, RR-256 RR-262, RR-291 RR-331, RR-358	Concerns regarding the risk of fire from batteries and other equipment. Concerns that there is no way prevent the spread of fire. Concerns regarding the associated risk of chemical leaks if the equipment were to catch fire.	The design of the Scheme will comply with industry good practice and environmental protection legislation during both construction and operation and maintenance e.g. prevention of surface and ground water pollution. The Scheme does not include the provision of batteries. All construction and decommissioning works will be subject to risk assessments as required by the Framework CEMP **[APP-238]** and the Framework DEMP **[APP-240]** which will minimise the risk of impacts from hazards such as fire. Mitigation measures to be implemented during construction and decommissioning are listed within the Framework CEMP **[APP-238]** and DEMP **[APP-240]** respectively, which will inform a detailed CEMP and DEMP and be secured by requirements in Schedule 2 of the Draft DCO **[AS-008].** As set out in the Framework CEMP **[AP-238]** prior to construction, the appointed Contractor will develop an Emergency Response Plan in consultation with the relevant local authority emergency planning officer, emergency services including the local fire service, as well as the Environment Agency (EA) in relation to responding to flood warnings and events. The detailed DEMP will also specify requirements for the safe storage of chemicals/other hazardous materials (e.g. fuel).
RR-177 RR-325	Concerns regarding the risk of cables leaking which have an oil filled core.	It is not proposed for the cables to be oil filled.
RR-013	Concerns regarding the security of residents due to the proposed permissive paths.	The Scheme incorporates fencing and security design measures which will mitigate against the risk of criminal activity. This includes internal facing CCTV systems which use infra-red technology avoiding the need for lighting. These will be installed around the perimeter of the operational areas of the Solar PV Site. These measures are described in Chapter 2: The Scheme of the ES **[APP-054]**.
RR-040, RR-104 RR-105, RR-116 RR-164, RR-196	Concerns regarding overlooking and loss of privacy from increased CCTV and security lighting.	One of the Scheme's design objectives is to ensure the design responds sensitively to residential properties in proximity to the Scheme regarding visual impact, noise, and lighting. This design approach is in accordance with paragraph 5.10.22 of NPS EN-1. To achieve this, the Scheme design retains existing vegetation as far as practicable and proposes carefully designed planting to provide screening. The design also incorporates buffers from residential properties to the solar PV infrastructure which are shown on the Framework Landscape Masterplan and the design commits to positioning noise emitting Field Stations 250 metres (m) or further from residential properties. The two Grid Connection Substations proposed as part of the Scheme are also greater than 250 m from residential properties.

Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
		The Scheme is also not proposing any visible lighting from CCTV or artificial lighting for security purposes. These design principles are set out in the Outline Design Principles Statement **[APP-235]**. The detailed design for the Scheme, which will need to be approved post consent prior to construction by ERYC and North Yorkshire Council (the relevant local authorities), must be in accordance with the design principles set out in the Outline Design Principles Statement **[APP-235]** and this is secured by a requirement in Schedule 2 to the Draft DCO **[AS-008]**.

Socio-Economics and Land Use

Table 2-36. Applicant's Responses to Public Relevant Representations relating to Socio-Economics and Land Use

Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
RR-066, RR-200 RR-225, RR-260 RR-325, RR-372	Concern that tourism to the local area will be negatively impacted as a result of the Scheme.	Section 12.7 of Chapter 12: Socio-Economics and Land Use, ES Volume 1 **[APP-064]** includes an assessment of socio-economic impacts at local and regional levels, including employment, the local economy, users of PRoW residential properties, business properties and community facilities. Chapter 12: Socio Economic and Land Use, ES Volume 1 **[APP-064]** presents the temporary annual employment generated by the Scheme, accounting for leakage, displacement, and multiplier effects. It states during construction, at peak workforce employment and typical seasonal occupancy levels, 100% of the Scheme's construction workers could be accommodated within both a 30 and 60-minute drive time of the Site. Given this, there would be no effect on the hotel, bed and breakfast, and inns accommodation sector arising from the Scheme. As such, no accommodation strategy is proposed for the Scheme.
RR-011, RR-049 RR-058, RR-060 RR-081, RR-084 RR-091, RR-103 RR-106, RR-116 RR-167, RR-172 RR-173, RR-183 RR-221, RR-222 RR-236, RR-246 RR-249, RR-252 RR-253, RR-256 RR-257, RR-262 RR-281, RR-296 RR-304, RR-317 RR-321, RR-323 RR-324, RR-333 RR-345, RR-360 RR-368, RR-375	Concern that houses prices will decrease in the vicinity of the Scheme.	Impacts on property prices are not a material consideration in the NSIP planning process and therefore should not be a factor which is considered by the Secretary of State when determining the application for development consent. In any event, it is not the Applicant's experience that solar development impacts negatively upon the value of properties. The Applicant will comply with the Compensation Code in respect of any compulsory acquisition associated with the Scheme, including any injurious affection or depreciation of land value in accordance with the relevant statutory tests.
RR-035, RR-083 RR-106, RR-144 RR-157, RR-170 RR-200, RR-240 RR-274, RR-316	Concerns that the loss of farmland would result in a loss of jobs for farm workers.	As set out in Chapter 12: Socio-Economic and Land Use of the ES **[APP-064]**, the Applicant has estimated that there are three existing jobs on the Site related to agricultural activities. The Applicant has estimated that to operate and manage the solar farm there will be a gross number of three permanent jobs generated by the Scheme. As presented in Table 12-22 of the same document, it is therefore estimated that there will be no net change in the employment supported by activities on the Site as a result of the Scheme. The jobs created will be in the renewable energy sector, assisting in the UK's transition to net zero.
RR-076, RR-083 RR-086, RR-127 RR-143, RR-156 RR-158, RR-165 RR-201, RR-215 RR-220, RR-241 RR-243, RR-251 RR-256, RR-262	Concern the Scheme would have negative impacts on the local economy and will lower the quality of life for residents who will not benefit from the Scheme.	Chapter 12: Socio-Economics and Land Use, ES Volume 1 **[APP-064]** identifies that the Scheme will result in beneficial effects (that are not significant) on the local economy as a result of employment generation during the construction and decommissioning periods. During the construction phase, a Framework Skills, Supply Chain and Employment Plan **[APP-247]** will be implemented. The purpose of this is to promote employment and training opportunities associated with the construction and operation of the Scheme. The implementation of this Plan will help to maximise the positive gain for the local economy from the beneficial effect arising from employment generation.

Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
RR-285, RR-311 RR-333		
RR-086	Concerns relating to the economic impact of Local Authority servicing additional amenities and repairing roads.	The Framework CTMP **[APP-238]** provides full details of embedded mitigation measures that are proposed to prevent or reduce potential adverse effects associated with traffic on roads. Any large vehicles required for the construction of the Scheme will use defined routes to arrive at the compound locations, as described within Section 4 of the Framework CTMP **[APP-238]**. It is noted that the Scheme would be subject to business rates whereby money is given to the LPA; contrary to agricultural land and farming uses which are generally exempt from paying business rates.

Transport and Access

Table 2-37. Applicant's Responses to Public Relevant Representations relating to Transport and Access

Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
RR-033, RR-034 RR-065, RR-152 RR-158, RR-219 RR-250, RR-257 RR-259, RR-263 RR-276, RR-330 RR-339, RR-368	Concerns about the number of HGVs on single track roads which are considered by local residents to be at limit currently. Concerns that roads will be damaged and there will be an increase in potholes. The single track roads have very soft verges and few passing places, causing disruption to road users. There are also concerns on the access point through the hamlet of Newsholme is unfit for HGV traffic, where the proposed access/egress turning circumference is not wide enough to support turning lorries.	Details of the expected traffic volumes and types of vehicles expected to be used are provided within Section 3 of the Framework CTMP **[APP-238]**. During the peak period of construction, the Scheme would generate 25 in and 25 out daily HGV movements and 50 in and 50 out daily Tractor-Trailer movements spread across the local road network. Assessment within Chapter 13: Transport and Access of the ES, Section 13.7 **[APP-065]** concludes that significant adverse effects would only be expected in one location (B1228 between B1230 and Brind Lane junctions). This effect is not related to the volume of HGV or Tractor-Trailer movements. No significant adverse effects would be expected at any other locations. Any impacts (including at the B1228 between B1230 and Brind Lane junctions) would be temporary and would be managed through the embedded mitigation measures. The Framework CTMP **[APP-238]** provides full details of embedded mitigation measures that are proposed to prevent or reduce potential adverse effects associated with traffic on roads. Any large vehicles required for the construction of the Scheme will use defined routes to arrive at the compound locations, as described within Section 4 of the Framework CTMP **[APP-238]**. Access routes have been tracked using industry standard Autotrack software, as provided in Appendix 13-5: Framework CTMP, Annex A: Proposed Access Layouts, Visibility Splays and Swept Paths within the ES **[APP-114, APP-15, APP-116]**. This has been done to ensure that movements can be made suitably and safely. Where issues were identified, carriageway widening and/or vegetation removal and associated traffic management to facilitate safe implementation would be introduced. As detailed within Table 4 of the Framework CTMP **[APP-238]**, access to Solar PV Area 3c for HGVs and Tractor-Trailer vehicles during construction will be taken by travelling south on Rowlandhall Lane, before turning into the access and travelling east on internal roads to access 3c. A plan showing this routing is included at Appendix 13-5-5 of the same document. The road through Newsholme will not be used for construction access for the Solar PV Area 3c.
RR-003, RR-005 RR-008, RR-009 RR-011, RR-012 RR-017, RR-021 RR-023, RR-028 RR-029, RR-037 RR-040, RR-049 RR-051, RR-053 RR-055, RR-057 RR-062, RR-066 RR-070, RR-075 RR-077, RR-080 RR-081, RR-086 RR-093, RR-094 RR-095, RR-098 RR-105, RR-106 RR-108, RR-112 RR-120, RR-122	Concerns about the increase in traffic during the construction period and the negative impact this will have to local residents. Request for a traffic plan during the construction phase.	A full and detailed assessment of potential traffic and transport impacts from construction at sensitive receptors has been undertaken within Chapter 13: Transport and Access of the ES **[APP-065].** The conclusions (reference to Section 13.7) indicate that significant adverse effects would only be expected in one location (B1228 between B1230 and Brind Lane junctions). No significant adverse effects would be expected at any other locations. Any impacts (including at the B1228 between B1230 and Brind Lane junctions) would be temporary and would be managed through the embedded mitigation measures. The Framework CTMP **[APP-238]** provides full details of embedded mitigation measures that are proposed to prevent or reduce potential adverse effects associated with construction traffic on local roads. A detailed CTMP (which must substantially accord with the Framework CTMP) will need to be approved post consent prior to construction with the relevant local authorities and this is secured by a requirement in Schedule 2 to the Draft DCO **[AS-008]**.

Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
RR-125, RR-126 RR-127, RR-130 RR-131, RR-132 RR-137, RR-143 RR-144, RR-147 RR-150, RR-152 RR-157, RR-160 RR-164, RR-170 RR-179, RR-183 RR-185, RR-194 RR-196, RR-200 RR-201, RR-209 RR-213, RR-215 RR-217, RR-221 RR-223, RR-225 RR-236, RR-242 RR-243, RR-249 RR-252, RR-253 RR-254, RR-256 RR-258, RR-260 RR-262, RR-267 RR-269, RR-271 RR-273, RR-275 RR-277, RR-278 RR-279, RR-281 RR-286, RR-298 RR-302, RR-305 RR-307, RR-309 RR-313, RR-314 RR-318, RR-321 RR-325, RR-326 RR-327, RR-329 RR-330, RR-331 RR-332, RR-335 RR-336, RR-339 RR-342, RR-344 RR-352, RR-356 RR-357, RR-358 RR-360, RR-364 RR-365, RR-367 RR-368, RR-371 RR-373		
RR-264	Concerns on the ecological disruption caused by traffic.	A Framework CEMP **[APP-238]**, Framework OEMP **[APP-239]** and Framework DEMP **[APP-240]** have been prepared for the DCO Application to manage environmental effects of the Scheme and to demonstrate compliance with environmental legislation. This includes mitigation to reduce the effects of traffic on the local environment.
RR-354, RR-361	Concerns on the negative impact to safety as a result of increased traffic. Concern that accidents on narrow lanes	A full and detailed assessment of potential traffic and transport impacts from construction at sensitive receptors has been undertaken within Chapter 13: Transport and Access of the ES **[APP-065].** The conclusions (reference to Section

Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
	are likely to increase during the construction period. The A63 road is considered to be dangerous as road users can tend to speed and overtake after the sharp bend from Howden on the straight bit of road heading to Wressle.	13.7) indicate that significant adverse effects would only be expected in one location (B1228 between B1230 and Brind Lane junctions). No significant adverse effects would be expected at any other locations. Any impacts (including at the B1228 between B1230 and Brind Lane junctions) would be temporary and would be managed through the embedded mitigation measures. The Framework CTMP **[APP-238]** provides full details of embedded mitigation measures that are proposed to prevent or reduce potential adverse effects associated with construction traffic on local roads. A detailed CTMP (which must substantially accord with the Framework CTMP) will need to be approved post consent prior to construction with the relevant local authorities and this is secured by a requirement in Schedule 2 to the Draft DCO **[AS-008]**.
RR-141	Concern over local residents' access for emergency services will be severely compromised during the construction period.	As set out in the Framework CTMP **[AP-113]** prior to construction, the appointed Contractor will develop an Emergency Response Plan in consultation with the relevant local authority emergency planning officer, emergency services including the local fire service, as well as the EA in relation to responding to flood warnings and events. An appointed Construction Site Manager will be responsible for liaising with emergency services to ensure access is not compromised. A detailed CEMP which would be substantially in accordance with the Framework CEMP **[APP-238]** will be secured by a requirement in Schedule 2 of the Draft DCO **[AS-008].**
RR-040, RR-116	Concerns that there would be an adverse impact on PRoW. Comment that PRoW should not be moved.	Chapter 12: Socio-economics and Land Use within the ES **[APP-064]** assesses effects of the Scheme on PRoWs. It does not find any evidence that footpaths will be severely compromised. During the construction phase and decommissioning phase, that effects on PRoWs will be negligible. During operation, a minor beneficial effect is expected. During construction, no PRoW closures will be required. The PRoW will be buffered from the perimeter fencing, with fencing being installed a minimum distance of 20 m either side of the centre of the PRoW where solar infrastructure lies to both sides (creating a 40 m wide corridor between the fence lines), or 15 m if solar infrastructure is to one side only. There will be a further 5 m from the perimeter fence to the Solar PV panels. HDD will be used where the Grid Connection Corridor crosses the Rivers Ouse and Derwent and so the footpaths at these locations will be unaffected. The other PRoWs crossed by the Grid Connection Corridor and all PRoW which are crossed by the Interconnecting Cable Corridor would only be impacted during the short-term trenching and restoration operations. These PRoWs would remain open (likely managed through traffic management measures) although routes may be slightly diverted temporarily for a short period, for example moving from one side of a road to the other. During operation, no closures or diversions to PRoWs are expected. Permissive Paths to enhance the current PRoW network will be provided as part of the Scheme. During decommissioning there should be no need for any closures of PRoW. In a worst-case scenario, PRoW crossing the Grid Connection or Interconnecting Cable Corridor may be disrupted by traffic management or temporary diversions, but these will be short-term in duration. A Framework PRoW Management Plan **[APP-245]** submitted with the DCO Application, outlines how PRoW (PRoW) will be managed during construction and operation of the Scheme. The measures contained within this document (Section 3.7) will help to ensure the operation of PRoW in the local area in terms of user safety and accessibility. The Framework CEMP **[APP-238]**, the Framework OEMP **[APP-239],** and Framework DEMP **[APP-239]** have been prepared which explain the proposed management of PRoW (including diversions) and any PRoW mitigation during the construction, operation and decommissioning of the Scheme, as well as the implementation of permissive routes. Detailed management plans will need to be approved post consent prior to construction by the relevant local authorities. These detailed management plans must substantially accord with the framework management plans and this is secured by a requirement in Schedule 2 to the Draft DCO **[AS-008]**.

Waste

Table 2-38. Applicant's Responses to Public Relevant Representations relating to Waste

Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
RR-011, RR-021 RR-110, RR-132 RR-185, RR-204 RR-223, RR-325 RR-333, RR-334	Concerns over the lack of methods to recycle the large number of solar panels proposed to be used, as well as the cost of disposing panels once decommissioned.	An assessment of the Schemes impact on materials and waste is set out in section 16.7 of Chapter 16: Other Environmental Topics of the ES **[AS-016].** It states that recycling routes for solar panels are generally available at present, and it is likely that there will be even greater opportunities for recycling in the future, not least because the market will have expanded to meet demand as solar PV installations increase. The company "Recycle Solar", based nearby in North Lincolnshire, reports that 90% of the glass and 95% of the semiconductor materials in end-of-life solar panels can be extracted for use in new PV panels. The overall recovery rate is therefore expected to be greater than 60% (and potentially greater than 90%). Paragraph 2.7.2 of the Framework Decommissioning and Environmental Management Plan confirms that the waste hierarchy will be applied in respect of decommissioning, and this is secured via Requirement 18 of Schedule 2 of the Draft DCO. The cost of recycling panels is part of the business model established by the Applicant.
RR-009, RR-011 RR-014, RR-021 RR-037, RR-170 RR-223, RR-261 RR-325, RR-333 RR-353	Concern about the carbon footprint and ethics of manufacturing and transporting the solar panels from China. Comments voice concerns that the materials should be from the Britain or from Europe.	The decision of which solar panels will be used will be one of the last decisions to be made when looking to place orders which would be after a decision made by the Secretary of State on the application. The Applicant will source the most appropriate materials to deliver the Scheme. The technical complexity of the Scheme means that some materials will be sourced from countries outside of the UK. The majority of the panel components will be recyclable and materials can be recovered and re-used. An assessment of the Schemes impact on materials and waste is set out in section 16.7 of Chapter 16: Other Environmental Topics of the ES **[AS-016],** which discusses this further. The Framework Skills, Supply Chain and Employment Plan **[APP-247]** provides an overview of the Applicant's commitments to the supply chain and is secured by a requirement in Schedule 2 of the Draft DCO **[AS-008].**

Noise and Vibration

Table 2-39. Applicant's Responses to Public Relevant Representations relating to Noise and Vibration

Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
RR-012, RR-017 RR-040, RR-058 RR-065, RR-083 RR-096, RR-104 RR-105, RR-120 RR-122, RR-127 RR-132, RR-144 RR-147, RR-163 RR-183, RR-190 RR-193, RR-196 RR-200, RR-215 RR-217, RR-219 RR-226, RR-230 RR-249, RR-252 RR-254, RR-256 RR-262, RR-296 RR-305, RR-309 RR-323, RR-331 RR-340, RR-360 RR-362	Concern about the long-term noise pollution impact resulting from the Scheme.	Noise and vibration during the construction phase and noise during the operational phase have been assessed in Chapter 11: Noise and Vibration of the ES **[APP-063]**. With the exception of the unlikely scenario of night time HDD activities during construction, significant adverse noise and vibration effects during the construction, operation and decommissioning of the Scheme will be avoided at sensitive receptors. A hierarchy of mitigation measures is contained in the Framework CEMP **[APP-238]** to ensure that the predicted significant noise effects do not occur due to potential HDD night-time works and will be agreed once the Principal Contractor for these works is appointed. The measures include avoiding HDD works within 200m of residential receptors where practicable; considering the option for open cut cable laying instead of HDD; the potential for using quieter equipment; and the use of temporary acoustic fencing depending on the location, plant and timing of works. The Applicant has committed to positioning noise emitting Field Stations 250m or further from residential properties. The two Grid Connection Substations proposed as part of the Scheme are also greater than 250m from residential properties. The Scheme is also not proposing any visible lighting from CCTV or artificial lighting for security purposes. These design principles are set out in the Outline Design Principles Statement **[APP-235]**. The detailed design for the Scheme, which will need to be approved post consent prior to construction by the relevant local authorities, must be in accordance with the design principles set out in the Outline Design Principles Statement **[APP-235]** and this is secured by a requirement in Schedule 2 to the Draft DCO **[AS-008]**.
RR-249, RR-252 RR-354	Concern about the noise and vibration from the electricity box and its positioning.	Noise and vibration during the construction phase and noise during the operational phase have been assessed in Chapter 11: Noise and Vibration of the ES **[APP-063]**. With the exception of the unlikely scenario of night time HDD activities during construction, significant adverse noise and vibration effects during the construction, operation and decommissioning of the Scheme will be avoided at sensitive receptors. A hierarchy of mitigation measures is contained in the Framework CEMP **[APP-238]** to ensure that the predicted significant noise effects do not occur due to potential HDD night-time works and will be agreed once the Principal Contractor for these works is appointed. The measures include avoiding HDD works within 200m of residential receptors where practicable; considering the option for open cut cable laying instead of HDD; the potential for using quitter equipment; and the use of temporary acoustic fencing depending on the location, plant and timing of works. The Applicant has committed to positioning noise emitting Field Stations 250 metres (m) or further from residential properties. The two Grid Connection Substations proposed as part of the Scheme are also greater than 250 m from residential properties. The Scheme is also not proposing any visible lighting from CCTV or artificial lighting for security purposes. These design principles are set out in the Outline Design Principles Statement **[APP-235]**. The detailed design for the Scheme, which will need to be approved post consent prior to construction by the relevant local authorities, must be in accordance with the design principles set out in the Outline Design Principles Statement **[APP-235]** and this is secured by a requirement in Schedule 2 to the Draft DCO **[AS-008]**.
RR-112	Concern that vibrations from construction vehicles will cause damage to residents' properties.	Noise and vibration during the construction phase and noise during the operational phase have been assessed in Chapter 11: Noise and Vibration of the ES **[APP-063]**. The assessment concludes that there would be no significant vibration effects as a result of the Scheme.
RR-339	Impact of noise from the Scheme on local animals e.g. dogs.	Noise and vibration during the construction phase and noise during the operational phase have been assessed in Chapter 11: Noise and Vibration of the ES **[APP-063]**. With the exception of the unlikely scenario of night time HDD activities during

Ref. No.	Comments from Relevant Representations	Response to Relevant Representation
		construction, significant adverse noise and vibration effects during the construction, operation and decommissioning of the Scheme will be avoided at sensitive receptors. A hierarchy of mitigation measures is contained in the Framework CEMP **[APP-238]** to ensure that the predicted significant noise effects do not occur due to potential HDD night-time works and will be agreed once the Principal Contractor for these works is appointed. The measures include avoiding HDD works within 200m of residential receptors where practicable; considering the option for open cut cable laying instead of HDD; the potential for using quitter equipment; and the use of temporary acoustic fencing depending on the location, plant and timing of works. The Applicant has committed to positioning noise emitting Field Stations 250m or further from residential properties. The two Grid Connection Substations proposed as part of the Scheme are also greater than 250 m from residential properties. The Scheme is also not proposing any visible lighting from CCTV or artificial lighting for security purposes. These design principles are set out in the Outline Design Principles Statement **[APP-235]**. The detailed design for the Scheme, which will need to be approved post consent prior to construction by the relevant local authorities, must be in accordance with the design principles set out in the Outline Design Principles Statement **[APP-235]** and this is secured by a requirement in Schedule 2 to the Draft DCO **[AS-008]**. Animals, such as dogs, may be startled by short high noise events. However, with the implementation of the Framework CEMP **[APP-238]** noise and vibration effects during the construction of the Scheme will be minimised. During operation, noise from a solar farm is low and continuous and unlikely to cause disturbance in the long-term to animals.