
WRITTEN SUPPLEMENTARY SUBMISSIONS AND RESPONSE TO THE REPLIES INCORPORATED INTO THE CASE FILE

Case File	ATALFE/2022/61/03
Project	Photovoltaic plant "FV VALLEDELSOL" and evacuation infrastructure
Developer	Tierra de Sol Project, S.L.U.
Purpose	To incorporate into the case file supplementary responsive submissions, with an express reservation of appeal rights
Reference documents	Statement of submissions dated 12/03/2026; reply from the Territorial Service; developer's letter dated 28/07/2025; Sector J Report; and the other documentation mentioned in the administrative forwarding itself
Date of this submission	Alicante, 9 April 2026

**TO THE TERRITORIAL SERVICE OF INDUSTRY, ENERGY AND MINES OF ALICANTE
(AND, WHERE APPROPRIATE, TO THE DIRECTORATE-GENERAL COMPETENT TO ISSUE THE DECISION)**

SUBJECT: WRITTEN SUPPLEMENTARY SUBMISSIONS AND RESPONSE TO THE REPLIES INCORPORATED INTO THE CASE FILE. "FV VALLEDELSOL" PHOTOVOLTAIC PLANT AND EVACUATION INFRASTRUCTURE. CASE FILE ATALFE/2022/61/03.

Mr JUAN CARLOS LEAL POZO, holder of Spanish ID No. 33484959H, acting in the name and on behalf of the ASOCIACION DE VECINOS DEL VALLE DEL SOL - EL BOTER, holder of Tax ID No. G53106266, with service address for notifications at C/ Estambre, 35, 03115 Alicante, and registered in the Register of Associations of the Valencian Community, First Section, No. 5054, also designating the email address info@asociacionvalledelsol.es as an additional preferred means of contact, appears and, as may be best in law,

CONTENTS

STATES	3
I. BACKGROUND	3
II. LEGAL GROUNDS AND APPLICABLE CRITERIA	4
III. SUPPLEMENTARY SUBMISSIONS	5
FIRST. ON THE ASSOCIATION'S STATUS AS AN INTERESTED PARTY AND THE RIGHT TO EFFECTIVE NOTICE.	5
SECOND. ON THE INSUFFICIENCY OF THE DEVELOPER'S REPLY FORWARDED BY THE ADMINISTRATION.	5
THIRD. ON THE NEED TO INCORPORATE IN FULL INTO THE CASE FILE, AND TO EFFECTIVELY FORWARD, THE LATER REPORTS AND THE CONSOLIDATED PROJECT OF APRIL 2026.	6
FOURTH. ON THE NECESSARY CORRELATION BETWEEN THE 2024 DIA AND THE PROJECT ULTIMATELY CAPABLE OF AUTHORISATION.	7
FIFTH. ON THE ISSUE OF THE FELINE SPECIMEN COMPATIBLE WITH THE IBERIAN LYNX AND THE IMPROPRIETY OF TREATING THE MATTER AS DISMISSED ON THE BASIS OF A MERE VERBAL COMMUNICATION.	7
SIXTH. ON THE INSUFFICIENCY OF URBAN-PLANNING AND TERRITORIAL REASONING IN LIGHT OF THE DOCUMENTATION PROVIDED BY THE DEVELOPER ITSELF.	8
SEVENTH. ON THE RESIDENTIAL IMPACT, THE 25-METRE SETBACK, AND THE INTEGRATION MEASURES ANNOUNCED BY THE DEVELOPER.	9
EIGHTH. ON THE FRAGMENTATION OF THE EVACUATION INFRASTRUCTURE AND THE IMPACT OF THE ASSOCIATED STM / SUBSTATION.	9
NINTH. ON THE SPECIFIC DECLARATION OF PUBLIC UTILITY.	10
TENTH. ON THE PERSISTING NEED FOR A SINGLE, CONSOLIDATED AND COHERENT TECHNICAL CASE FILE.	10
ELEVENTH. ON THE NEED FOR AN EXPRESS, INDIVIDUALISED AND SUFFICIENTLY REASONED DECISION.	11
IV. REQUESTS	11
V. EXPRESS RESERVATION OF RIGHTS	13
FURTHER STATES	13

STATES

That, by means of this document, it submits SUPPLEMENTARY SUBMISSIONS and a RESPONSE to the reply sent by that Territorial Service and to the documentation forwarded by the developer, all in relation to case file ATALFE/2022/61/03, requesting that it be incorporated in full into the case file and expressly considered before any decision is issued, on the basis of the following:

I. BACKGROUND

1. This party submitted a written statement of submissions on 12 March 2026 within the second public information procedure relating to the modified installation, reiterating its appearance in the proceedings, its opposition to the authorisation in the configuration proposed and, subsidiarily, the need to reinforce the environmental, territorial, landscape and residential-protection safeguards.

2. Subsequently, the Association received a letter from the Territorial Service of Industry, Energy and Mines of Alicante giving a reasoned reply to the submissions made by the Association and stating, among other matters, the following:

- a) that mere appearance in the procedure would not, by itself, confer the status of interested party;
- b) that the developer's reply is being forwarded;
- c) that the project has an Environmental Impact Declaration (DIA) dated 4 October 2024, published on 14 January 2025;
- d) that later favourable reports are on file, in particular those relating to green infrastructure and landscape dated 31 March 2026, the favourable report of the Directorate-General for the Natural and Animal Environment dated 26 March 2026, and the joint report on territorial risks and territorial impacts dated 17 March 2026; and
- e) that the developer allegedly incorporated those conditions into a consolidated project submitted in April 2026.

3. The developer documentation forwarded to this Association does not, however, constitute a specific or updated reply to the submissions dated 12 March 2026. On the contrary, the developer's own letter is dated 28 July 2025 and expressly states that it responds to a submission received on 24 March 2025. Accordingly, that document predates the second 2026 public information procedure and does not rebut, in a singularised or complete manner, the new issues introduced in this party's submission of 12 March 2026, particularly those relating to the urgent procedure, the new public information stage, the reports issued in March 2026, the consolidated project of April 2026, and the indications of protected fauna provided with the recent submissions.

4. Likewise, the president of the Association received a verbal telephone communication said to come from the Regional Ministry competent in environmental matters, in which it was stated that checks or measurements had allegedly been carried out in relation to the feline specimen whose presence had been brought to the attention of the case file and that, in the view of the caller, "it does not appear to be a lynx". However, that communication has not been incorporated into the case file in writing, has not been formally notified to this party, does not identify the technical author, methodology, date, exact location, material analysed or reasoned conclusions, and therefore cannot produce any legal effect or validly serve to contradict a faunal indication that has already been documented and submitted in the procedure.

5. The Association files this document with a twofold purpose: first, to place on record, expressly and in an orderly manner, the insufficiency of the reply received and the matters that remain without a substantive response; and, second, clearly to preserve the future avenue of challenge against any eventual authorising decision that is insufficiently reasoned or issued with impairment of the right to participate and to contest.

II. LEGAL GROUNDS AND APPLICABLE CRITERIA

1. Law 39/2015 of 1 October on the Common Administrative Procedure of Public Administrations, particularly as regards the concept of interested party, the right of access to the case file, the submission of observations, the hearing process, the duty to state reasons and the prohibition of substantive procedural defencelessness.

2. Law 21/2013 of 9 December on environmental assessment, insofar as it requires the assessment to cover the project that is actually capable of being authorised, on the basis of sufficient, updated and scientifically consistent environmental information.

3. Law 24/2013 of 26 December on the Electricity Sector, and Royal Decree 1955/2000 of 1 December, on the authorisation of electrical installations, the specific declaration of public utility, expropriation requirements and the effects of the DUP.

4. Decree-Law 14/2020 of 7 August of the Consell, and the territorial, urban-planning and landscape legislation applicable to the siting of photovoltaic plants in the Valencian Community.

5. Revised Text of the Law on Territorial Planning, Urban Development and Landscape, approved by Legislative Decree 1/2021 of 18 June, especially as regards landscape, territorial integration and compatibility with the residential environment.

6. Law 42/2007 of 13 December on Natural Heritage and Biodiversity; Royal Decree 139/2011 of 4 February; and the principle of caution or precaution in the presence of serious and not formally dismissed indications of protected fauna.

III. SUPPLEMENTARY SUBMISSIONS

FIRST. ON THE ASSOCIATION'S STATUS AS AN INTERESTED PARTY AND THE RIGHT TO EFFECTIVE NOTICE.

The statement contained in the letter from the Territorial Service to the effect that mere appearance in the procedure does not by itself confer the status of interested party cannot, in this case, be turned into an implicit or generic denial of the appearance requested by this Association.

The Association represents collective interests directly connected with the subject matter of the procedure, as it groups together residents living in the immediate area of implementation who are affected by the physical proximity of the project, by its landscape and visual impacts, by possible acoustic and electromagnetic effects, by construction traffic, by the associated electrical evacuation infrastructure, and by the project's overall territorial impact. It is therefore a legitimate collective interest that is real, specific and differentiated, and not merely abstract.

Accordingly, it is requested that formal recognition of the Association's status as an interested party be expressly granted, with notification and service of all reports, consolidated projects, proposed decisions and decisions issued in the case file.

SECOND. ON THE INSUFFICIENCY OF THE DEVELOPER'S REPLY FORWARDED BY THE ADMINISTRATION.

The first substantive objection that must be placed on record is strictly chronological and procedural: the developer document that has been forwarded to this party is dated 28 July 2025 and states that it responds to a submission received on 24 March 2025. It does not therefore constitute a specific reply to the statement of submissions filed by this Association on 12 March 2026 within the framework of the second public information procedure.

Accordingly, key issues introduced in the 2026 submission remain without an individualised response, including:

- a) the challenge to the sufficiency of the assessment in relation to the project that is truly capable of authorisation;
- b) the requirement of access and contradiction with respect to reports and conditions issued after the public display;
- c) the need for integrated analysis of the evacuation infrastructure and the associated grid node;
- d) the impropriety, or where appropriate the strict limitation, of the specific DUP;
- e) the persistence of documentary inconsistencies;
- f) the specific impact on the nearby residential environment; and
- g) the impact of the indications of protected fauna brought to the Administration's attention in 2026.

For that reason, the submission dated 12 March 2026 cannot be deemed answered merely by forwarding an earlier document drafted for a different procedural moment and for a different submission. If the Administration intends to rely on a reply from the developer in order to reject this party's arguments, it must require an updated reply, specific and expressly addressed to the 2026 submissions; otherwise, everything alleged by this Association that falls outside the scope of the 2025 letter must be deemed not to have been contradicted.

THIRD. ON THE NEED TO INCORPORATE IN FULL INTO THE CASE FILE, AND TO EFFECTIVELY FORWARD, THE LATER REPORTS AND THE CONSOLIDATED PROJECT OF APRIL 2026.

The very letter sent by the Territorial Service states that favourable reports dated 17, 26 and 31 March 2026 are on file, together with a consolidated project submitted in April 2026 that would incorporate the conditions set out in those reports.

This point is crucial. If the future decision is to rest on those reports and on that consolidated project, the project that is truly capable of authorisation is no longer only the one submitted to public information in February 2026, but rather the final result shaped by those conditions and incorporated into the April 2026 consolidated version. This is especially relevant in proceedings handled by the urgent route, with shortened time limits, because the shortening of time may not become a weakening of the right of defence when decisive documents appear after the public display stage. In that context, the duty of access, clarity and effective contradiction is intensified. At a minimum, this requires:

- 1) the full, legible and downloadable incorporation of those reports into the case file accessible to this party;
- 2) the full incorporation of the consolidated project of April 2026;
- 3) the precise identification of what changes each condition introduces and in which documents, plans, annexes or sections of the project those changes are reflected; and
- 4) a real opportunity to contest before any decision is taken, at least as regards the documents produced after the public information stage that are likely to determine the outcome of the decision.

A generic statement that the reports are favourable and that the developer "has carried out" or "has incorporated" their conditions is not sufficient. If the decisive documents post-date the public display stage and, in addition, alter or refine the configuration of the project, public participation and the defence of interested parties cannot be emptied of content.

Accordingly, it is expressly requested that no decision be issued without first granting full access to those reports and to the consolidated version, and without allowing this party to make specific submissions in response to them. And, if comparison between the publicly displayed version and the consolidated version reveals substantial or materially relevant amendments, the legally appropriate rollback or supplementary procedure must be ordered, including, where appropriate, a new public information stage.

FOURTH. ON THE NECESSARY CORRELATION BETWEEN THE 2024 DIA AND THE PROJECT ULTIMATELY CAPABLE OF AUTHORISATION.

The existence of an Environmental Impact Declaration issued in October 2024 is not, by itself, sufficient to close the controversy if the project that is ultimately sought to be authorised in 2026 is not the same in scope, configuration, actual location, corrective measures, landscape integration, evacuation infrastructure, fencing, setbacks and conditions.

Precisely because the case file acknowledges:

- (i) a second public information procedure due to substantial amendments,
- (ii) the existence of later reports with conditions, and
- (iii) the submission of a consolidated project in April 2026,

it is essential expressly and with reasons to verify that the 2024 DIA still fully covers the real and final project intended to be approved.

This party requests that a correspondence matrix or traceability table be incorporated into the case file between:

- a) the project initially assessed;
- b) the version submitted to the second public information procedure in 2026;
- c) the reports and conditions of March 2026; and
- d) the consolidated project of April 2026.

If that traceability is not expressly documented, the decision will be exposed to a clear challenge for insufficient reasoning, possible fragmentation of the environmental analysis, and possible disconnect between the environmental assessment and the project ultimately capable of authorisation.

FIFTH. ON THE ISSUE OF THE FELINE SPECIMEN COMPATIBLE WITH THE IBERIAN LYNX AND THE IMPROPRIETY OF TREATING THE MATTER AS DISMISSED ON THE BASIS OF A MERE VERBAL COMMUNICATION.

The submission relating to the presence of a feline specimen compatible with the Iberian lynx - or, subsidiarily, with another protected wild carnivore - has not been refuted in legally valid terms.

The verbal telephone call received by the president of the Association is not equivalent to a technical report, is not part of the case file, has not been notified, does not identify the acting technician, does not state the methodology, does not specify whether the check was carried out on photographs, tracks, field surveys or any other element, and does not allow any scrutiny by this party. In those circumstances, such communication cannot operate as an implied dismissal or as a sufficient contradiction of an environmental fact that has been formally brought to the Administration's attention.

Furthermore, even on the hypothesis that the photographed specimen were concluded not to be an Iberian lynx, that would not automatically deprive the submission of substance, because it would still be necessary, on the basis of technical and documentary support, to determine whether it is another species of protected wild fauna and whether the area has ecological functionality requiring additional cautionary, survey or corrective measures.

Accordingly, it is requested:

- a) that the report or written record resulting from the checks carried out be incorporated into the case file, if it exists;
- b) that such document identify the author, qualifications or technical affiliation, dates of visit, coordinates or inspected sector, material analysed and reasoned conclusion;
- c) that, if no such report exists, the environmental submission made by this Association not be deemed dismissed; and
- d) that, before any decision is issued, an express opinion be obtained from the body competent in biodiversity and, where appropriate, a specific and updated fauna survey be ordered for the area materially affected by the implementation and its evacuation infrastructure.

The Administration must exercise the utmost caution where there is a serious faunal indication that has not been formally refuted. Replacing the case file with verbal comments deprives this party of the possibility of contradiction and leaves a sensitive environmental issue without traceability.

SIXTH. ON THE INSUFFICIENCY OF URBAN-PLANNING AND TERRITORIAL REASONING IN LIGHT OF THE DOCUMENTATION PROVIDED BY THE DEVELOPER ITSELF.

The developer's 2025 reply not only fails to neutralise the urban-planning and territorial submission, but also provides an element that reinforces the need for strengthened reasoning: the so-called "Sector J Report", attached by the developer itself, acknowledges that urban development of the sector is currently non-existent, that there is no development instrument in force, and that any eventual reactivation would require complex strategic environmental and territorial processing. It even records precedents from the Regional Ministry itself that were unfavourable to development of the sector for environmental reasons and concludes that development prospects are uncertain and, in any event, not immediate.

That premise does not, however, automatically imply the full territorial suitability of the proposed photovoltaic installation, let alone the disappearance of the residential and environmental sensitivity of the surrounding area. The fact that urban development is not immediate or faces serious difficulties does not in itself make the site unimpeachable from the standpoint of landscape, territory, biodiversity or protection of the neighbouring residential settlement.

Nor can it be accepted as sufficient reasoning to argue that the property owner seeks a "return" on its land or that there are hypothetically more troublesome private alternatives. The administrative analysis must rest on the project's objective conformity with the applicable legal framework and on the proper weighing of impacts, not on speculative comparisons with unprocessed uses or promises of integration that have not been legally incorporated into the project. Moreover, the urban-planning report attached by the developer itself describes territorial and environmental background factors pointing to a significant sensitivity of the area, mentioning the possible need for strategic environmental and territorial assessment, the existence of geomorphological flood-risk constraints, and biodiversity references which, far from trivialising the location, advise especially strengthened administrative reasoning.

Accordingly, the municipal certificate of urban-planning compatibility and the favourable reports invoked must be available in full and must, in addition, be interpreted in light of the specific reality of the surroundings: proximity to dwellings, high visual sensitivity, the need for strengthened compatibility with an established residential frontage, and the territorial and environmental background of Sector J made clear even by the developer's own documentation.

SEVENTH. ON THE RESIDENTIAL IMPACT, THE 25-METRE SETBACK, AND THE INTEGRATION MEASURES ANNOUNCED BY THE DEVELOPER.

The developer's letter insists that the project was redesigned to provide for a 25-metre setback from the residential development and the access road, heterogeneous vegetative barriers, reduced height and certain integration provisions, even mentioning in private communications or meetings ideas such as a pedestrian walkway, bicycle lane, benches, streetlights or garden.

It must be placed on record that none of those statements can neutralise the impact unless they are expressly incorporated, in a verifiable and legally binding manner, into the project ultimately capable of authorisation, with corresponding reflection in plans, descriptive report, measurements, budget, schedule, maintenance and replacement obligations, guarantees, and monitoring and control systems.

Landscape-integration measures cannot be left as mere voluntary statements, infographics or generic references to future collaborations. If the Administration intends to rely on them in order to regard the project as compatible, it must adopt them as express, objective and enforceable conditions. Failing that, those references must be regarded as insufficient to reduce the real impact on the neighbouring environment.

In any event, this party reiterates that the project's proximity to the residential edge, already objectively shown cartographically in the case file, determines an intense impact that does not disappear simply because of an announced setback or because of vegetative measures whose real effectiveness will depend on their size, density, implementation, maintenance and time of growth.

EIGHTH. ON THE FRAGMENTATION OF THE EVACUATION INFRASTRUCTURE AND THE IMPACT OF THE ASSOCIATED STM / SUBSTATION.

The developer's reply expressly acknowledges that the transformer substation is being developed directly by i-DE / Iberdrola and that, according to its position, such substation would be developed even if the photovoltaic project were not carried out. Far from dispelling this party's submission, that assertion reinforces it.

If the evacuation infrastructure and the associated node have sufficient functional autonomy or are presented as strategic in themselves, the need for an integrated and cumulative assessment becomes even stronger, not weaker. The formal separation of case files cannot conceal that, from the territorial, residential and environmental standpoint, the whole operates as one complex electrical solution with potentially permanent and cumulative impacts.

It is therefore requested that express note be made that this party fully maintains its objection to the fragmentation of the analysis and to the lack of joint assessment of the plant, substation, internal lines, connection infrastructure and associated node or substation, as well as of the less harmful routing or siting alternatives.

NINTH. ON THE SPECIFIC DECLARATION OF PUBLIC UTILITY.

The impropriety of the specific DUP in respect of the photovoltaic plant and its internal installations has not been substantively refuted.

The case file itself, as already alleged, proceeds on the basis that the developer has the land available - mostly by ownership and the remainder by lease - and that expropriation would not be necessary in order to develop the plant. If that is so, the declaration of public utility cannot operate as a general, preventive or abstractly convenient umbrella for the plant's entire implementation.

The specific DUP has intense effects: necessity of occupation, acquisition of rights, and urgent occupation. Precisely for that reason, it requires strict, specific and individualised reasoning as to the real expropriation need for each affected asset or right. Where the principal installation already has the land required, the Administration may not extend the DUP without rigorous clarification of which elements truly require it, why less harmful alternatives do not exist, and what attempts at voluntary solution have been pursued.

Accordingly, the principal request for refusal of the specific DUP in respect of the photovoltaic plant and its internal installations is reiterated. Only subsidiarily, if it were intended to retain it for certain crossings, easements, public assets or specific sections of the evacuation infrastructure, it is requested that it be limited to the indispensable minimum, with reasoning section by section and plot by plot.

TENTH. ON THE PERSISTING NEED FOR A SINGLE, CONSOLIDATED AND COHERENT TECHNICAL CASE FILE.

The documentary and arithmetic inconsistencies highlighted by this party have not received a closed and verifiable technical response. Nor has this party yet been provided with a single, consolidated and coherent version of the case file that would allow it to verify, beyond doubt, the final magnitudes of modules, strings, power, areas, fencing, setbacks, occupations and corrective measures.

The reference in the administrative letter to a consolidated project dated April 2026 confirms, precisely, that the case file still depends on subsequent documentary refinement. That circumstance requires that the demands of clarity, traceability and access be intensified, not relaxed.

Accordingly, this party reiterates that it requests:

- a) production of a single and consolidated version of the project;
- b) a schedule of changes between versions;
- c) identification of the documents that are definitively in force; and
- d) the possibility of making specific submissions in response to that final documentation before any decision is taken.

ELEVENTH. ON THE NEED FOR AN EXPRESS, INDIVIDUALISED AND SUFFICIENTLY REASONED DECISION.

For the purpose of preserving due subsequent administrative and judicial protection, this party expressly places on record that a stereotyped or generic response merely referring, in bulk, to favourable reports or to the general interest in renewable energies will not suffice.

Any eventual decision must address, expressly and individually, at least the following:

- 1) the Association's status as an interested party;
- 2) the sufficiency or insufficiency of the developer's forwarded reply;
- 3) the legal impact of the later reports and the consolidated project of April 2026;
- 4) the correlation between the 2024 DIA and the project ultimately capable of authorisation;
- 5) the issue relating to the photographed feline specimen and the existence or otherwise of written technical support contradicting the submission made;
- 6) the strengthened justification of territorial, urban-planning, landscape and residential compatibility;
- 7) the integrated or fragmented assessment of the evacuation infrastructure;
- 8) the propriety or impropriety of the specific DUP; and
- 9) real and complete access to the case file.

Failure to provide an individualised response on these points, or generic reference to standardised formulas, would increase the decision's vulnerability for insufficient reasoning, lack of effective contradiction and substantive procedural defencelessness.

IV. REQUESTS

In light of all the foregoing,

IT REQUESTS OF THE TERRITORIAL SERVICE AND OF THE COMPETENT DECISION-MAKING BODY:

- 1. That this written statement of supplementary and responsive submissions be deemed filed, admitted, and incorporated in full into case file ATALFE/2022/61/03.

2. That the ASOCIACION DE VECINOS DEL VALLE DEL SOL - EL BOTER be expressly recognised as an interested party in the procedure, with notifications served at the addresses and contact means already designated.

3. That the following documents be incorporated into the case file and made fully accessible, legible and downloadable before any decision is issued, if they have not already been formally forwarded to this party:

- a) the green infrastructure and landscape report or reports dated 31 March 2026;
- b) the favourable report of the Directorate-General for the Natural and Animal Environment dated 26 March 2026;
- c) the joint report on territorial risks and territorial impacts dated 17 March 2026;
- d) the municipal certificate or report of urban-planning compatibility;
- e) the consolidated project submitted in April 2026; and
- f) any comparative table of alternatives or technical and economic assessment document referred to in the administrative letter.

4. That, if the Administration intends to rely on the developer's letter in order to dismiss the submissions of 12 March 2026, it require from the developer a specific and updated reply expressly addressed to those submissions, since forwarding a letter dated 28 July 2025 and referring to a submission of 24 March 2025 is insufficient.

5. That the submission relating to the photographed feline specimen not be deemed dismissed on the basis of a mere verbal communication not incorporated into the case file and that, where appropriate, a complete and reasoned written technical report on the checks carried out be incorporated; and, if no such report exists, that an express opinion be obtained from the body competent in biodiversity and that, if appropriate, a specific and updated fauna survey be ordered.

6. That full correspondence between the DIA dated 4 October 2024 and the project ultimately capable of authorisation after the amendments, conditions and incorporation into the consolidated version of April 2026 be expressly verified and reasoned; and that, if substantial or materially relevant variations emerge, the supplementary procedure or rollback legally required be ordered, including, where appropriate, a new public information stage.

7. That the Preliminary Administrative Authorisation and the Administrative Construction Authorisation in the configuration currently being processed be refused and, in any event, that the specific Declaration of Public Utility be refused in respect of the photovoltaic plant and its internal installations for lack of proven expropriation need.

8. Subsidiarily, if the foregoing request is not upheld, that any eventual authorisation be subject, expressly, in detail and in an enforceable manner, to:

- a) effective setbacks finally reflected in the approval plans;
- b) binding landscape integration measures with maintenance and replacement obligations;
- c) a specific glare study;
- d) acoustic control at residential receptors;
- e) verification of electromagnetic fields at sensitive points;
- f) a works, traffic and safety plan for the neighbouring environment; and

g) strict, reasoned and individualised delimitation of any expropriation impact or easement that it is sought to maintain.

9. That the decision concluding the procedure give an express, singularised and reasoned response to all the substantive issues raised herein and to those already contained in the written submissions of 12 March 2026.

V. EXPRESS RESERVATION OF RIGHTS

This party expressly reserves all actions, supplementary submissions, administrative appeals and court actions that may correspond to it against qualified procedural acts and, where appropriate, against the final decision issued in the case file, especially if it is rendered without duly incorporating the documentation indicated, without recognising the Association's status as an interested party, without an individualised response to the issues raised herein, or without adequate reasoning on the environmental, territorial, urban-planning, residential and expropriatory dimension of the project.

FURTHER STATES

That, for the sake of improved documentary record, this party requests that, if there already exists any technical action, site visit, report, internal note, record or written communication relating to the checks carried out regarding the feline specimen brought to the attention of the case file, it be formally incorporated into the same and forwarded in full to this Association.

In Alicante, on 9 April 2026.

Signed: Juan Carlos Leal Pozo

On behalf of the Asociacion de Vecinos del Valle del Sol - El Boter

DOCUMENTS CITED OR WHOSE INCORPORATION IS REQUESTED:

1. Written submissions filed by the Association on 12 March 2026.
2. Letter sent by the Territorial Service of Industry, Energy and Mines of Alicante in reply to the submissions.
3. Developer's reply letter dated 28 July 2025.
4. Report concerning the urban-planning viability of Sector J.
5. Any sectoral reports of March 2026 and the consolidated project of April 2026 referred to in the administrative letter.
6. Where appropriate, written record or statement by the president of the Association regarding the telephone communication received in relation to the sighted feline specimen.