HELIOS RENEWABLE ENERGY PROJECT

PINS Document Number:
EN010140/APP/6.3.9.1

Pursuant to:
APFP Regulation 5(2)(a)

Environmental Statement Appendix 9.1: LLFA Consultation

June 2024

The Planning Inspectorate
By Email
info@helios-renewable-energy-project.co.uk

Michael Reynolds
Business and Environmental Services
East Block
County Hall
Racecourse Lane
Northallerton
DL7 8AD

Our Ref: Michael Reynolds
Your Ref: EN010140 -000010

Tel: [redacted]

Email:
[redacted]@northyorks.gov.uk

Date: 15 December 2023

Dear Sirs

Helios Renewable Energy Project
Statutory Consultation Response

Thank you for consulting North Yorkshire Council.

Our comments are as follows. Most of these comments refer to specific chapter of the PEIR and so are technical in nature. We would be happy to arrange meetings with the relevant officers to discuss the contents of the response.

1.0 Planning Policy and the Development Plan

1.1 The principle of the development in this location needs to be determined in accordance with National Policy Statements, Emerging National Policy Statements, the NPPF and the Development Plan for the area. The site falls within the Selby area of North Yorkshire Council.

1.2 The Adopted Development Plan for this area comprises;

- The Minerals and Waste Joint Plan (adopted 16 February 2022)- Policies S01, S02, S07, W01, W05
- The Selby Core Strategy Local Plan 2013-Policies Sp1, SP2, SP12, SP13, SP15, SP16, SP17, SP18 and SP19
- The Selby District Local Plan 2005-Policies ENV1, ENV2, ENV3, ENV4, ENV9, ENV12, ENV13, ENV16, ENV17, ENV27, ENV28, T1, T2, T8 AND CS6.

The Emerging Development Plan for this location it is:

1.3 Selby District Council Local Plan publication version 2022 (Reg 19) On 17 September 2019, Selby District Council agreed to prepare a new Local Plan. Consultation on issues and options took place early in 2020 and further consultation took place on

application the developer says the roads are likely to have capacity to absorb the increase in traffic. Whilst the LHA agrees existing traffic flows are very low. The impact of addition vehicles will result in some disruption and damage such as over running the verge as well as damage to the highway construction may occur.

8.10 Both roads do not have footways or road lights therefore LHA is concerned about pedestrian safety and this needs to be addressed. This should be highlighted in the CTMP

8.11 The residents on Hadenshaw Lane near the junction with A1041 will be affected by the increase in traffic flows whether they are low at present or not. Therefore, the developer is encouraged to review whether its possible to avoid using this Lane for construction element of the site.

Operational and Decommissioning phase's

8.12 The operation phase as described in the text will have very little impact on the highway network. The developer suggests there maybe 5 visits a month to the site by light vehicles or 4*4 vehicles. Parking for these vehicles will be accommodated within the site. Decommissioning of the site will be a similar process to the construction in terms of vehicle numbers. The L.H.A would expect to be consulted again at this stage to ensure work is undertaken safety.

Working with the highway authority.

8.13 The developer should be aware that any work on the highway will need consultation with the authority on such matters as informing the public and street work approval in connection with implementing the two access points. which will need to be prepared by the developer. The Authority sees this being included in the D.C.O.

9.0 Lead Local Flood Authority

9.1 Thank you for consulting the Lead Local Flood Authority on the planning application as referenced above.

9.2 The following documents are noted:

- Flood Risk Assessment, PFA Consulting, Dated August 2023.

In assessing the information provided would like to make the following comments:

9.3 We acknowledge that within a solar farm proposal, a portion of the site will comprise of proposed solar (PV) panels and energy storage facilities, whilst the remainder of the site comprises of the existing grassed spacing between rows and field margins.

9.4 In general terms the design of photovoltaic (PV) panels means that the area represented by the proposed panels is not considered impermeable, as the ground beneath all panels will be grassed and as such remains permeable.

9.5 In most circumstances rainfall will drain freely off the panels onto the ground beneath the panels where the surface remains permeable. Thus, the total surface area of the photovoltaic array is not considered to act as an impermeable area and the impact is assumed to be nil. However, the nature of the underlying groundcover and antecedent conditions can have a demonstrable influence on the surface water run-off characteristics of a site, i.e. if the ground cover beneath panels is proposed as bare earth which is susceptible to hardening in summer months, then peak discharges can increase significantly. As such, it should be ensured as part of any proposed scheme that grass or wildflower cover will be well-maintained across the site to ensure that such proposed schemes will not increase the surface water run-off rate, volume or time to peak compared to the pre-development situation. For example, This will also help provide net biodiversity gain.

- The National Planning Policy Framework ("NPPF") paragraphs 155 - 165 by ensuring that the proposal would not increase flood risk elsewhere and will incorporate sustainable drainage systems.

9.6 The application should also demonstrate how the proposal accords with national standards and relevant guidance. If the proposal does not accord with these the application should state the reasoning and the implications of not doing so. The key guidance available is set out below;

- Planning Practice Guidance - Flood Risk and Coastal Change

9.7 To ensure that development is undertaken in line with Paragraph 165 and 169 of the NPPF the LLFA recommends that an application considers the following;

a) The application submission should include a site specific assessment of the risk of flooding to the development site from all sources. The risk of flooding on the current site should be acknowledged using national flood risk datasets such as the EA's Risk of Flooding from Surface Water maps. If any areas at risk of flooding are identified, development should avoid these areas in line with NPPF. Where avoidance of any areas with mapped risk cannot be achieved, a robust strategy should be provided that includes adequate flood resilience measures incorporated in the design. This may require an emergency flood plan where appropriate.

b) Where required a Drainage strategy should be provided for any large impermeable substation and compound areas. LLFA deem that access roads are likely to become compacted over time and act as impermeable surfaces as well as any proposed buildings and substations. Small scale SuDS improvements should be proposed to mitigate these risks to improve the or maintain the natural drainage features of the

site. This is typical of other solar farm developments. This common setup means sites are usually considered 95% permeable, but associated infrastructure like battery storage units, solar stations, substations, internal roads should be considered as fully impermeable.

c) restrict vehicular movements on site to designated access tracks. In doing so, the risk of soil compaction is minimised and limited to specific locations.

d) The surface water usually flows from the surface of the solar array to the areas in between the rows with an increased velocity. This leads to an increased concentration of surface water and erosion in these areas and has the potential to create channelised flows, eroding the soil further and increasing the volumes and rates of surface water discharge. To mitigate this the following should be considered:

   Maintaining the vegetative areas between the solar arrays to assist in interrupting the flows and promote infiltration and interception. The ideal situation is that vegetation is grassed and is kept reasonably high or grazed by livestock. Good vegetation cover will limit the transfer of sediments and slow the flow of water.

   Specify what type of vegetation will be planted across the site and how will it be managed/ maintained in perpetuity.

   Rutting during the operation phase is also another common problem with solar farm sites, especially during intense storms at the foot of the panels. This can alter natural flow paths and should be avoided where possible. After construction the soil should be chisel ploughed, or similar, to mitigate soil compaction during construction. This will ensure that the site can infiltrate to its potential. Furthermore, during the first few years it is important to hold frequent inspections of the planting and soil to ensure it is growing properly, isn't bare and isn't compacted. Any remedial work should occur as soon as possible.

e) If there are any concerns with residual risk, due to concentrated rainfall (flash events etc), then simple shallow features (e.g. 0.6m deep) like linear swales or filter drains could be proposed along the lowest parts of the site to capture any exceedance. No runoff should leave the site up to the 1% AEP+CC storm.

f) Construction Environmental Management Plan (CEMP) should also be provided.

9.9 Further guidance for developers can be found within our SuDS Design Guidance.

9.10 Ref: A study on the hydrological implications of solar farms (Cook, L.M. and Mccuen, R.H. (2013) 'Hydrologic Response of Solar Farms', Journal of Hydrologic Engineering, 18: 536 - 541)

From:	[redacted]
To:	enquiries@nybcp.org
Subject:	E216: Helios Renewable Energy Project – Surface Water Drainage Strategy Principles (PINS Ref: EN010140 / NYC Case Ref: 101009919357)
Date:	25 July 2023 09:03:00
Attachments:	image002.png E216-FN11-Solar Farm Surface Water Drainage Principles-Issue 1.pdf

Good morning

E216: Helios Renewable Energy Project – Surface Water Drainage Strategy Principles (PINS Ref: EN010140 / NYC Case Ref: 101009919357)

PFA Consulting are advising Helios Renewable Energy Project on flood risk and surface water matters. The proposed development is a solar farm located to the south west of the village of Camblesforth. The Proposed Development has an expected energy generating capacity in excess of the 50MW threshold for onshore generating stations in England and therefore constitutes a 'nationally significant infrastructure project' (NSIP). Accordingly, Enso Green Holdings D Limited, (the Applicant) intends to make an application for a Development Consent Order (DCO) to authorise the Proposed Development. The DCO will include a description of the Proposed Development and will be accompanied by an Environmental Statement (ES). The Planning Inspectorate reference is EN010140.

As part of the DCO process we would like to engage with the flood and water management team in North Yorkshire Council to agree the approach to surface water management on the site. The site will remain a predominately greenfield following the development of a solar farm and as such a proportionate approach to surface water drainage should be taken based on Natural Flood Risk Management principles. We have produced a 'Solar Farm Surface Water Drainage Strategy Principles' document (attached) which we would like your view on in advance of the PEIR (draft ES and FRA) being produced.

The PIER which contains full details of the preliminary surface water drainage strategy and a preliminary Flood Risk Assessment is currently undergoing a review by our project team and it is anticipated to be formally submitted to the Planning Inspectorate (PINS) in the coming months. Once formally submitted this will trigger a formal consultation with North Yorkshire Council. Although the full suite of documents will soon be available to comment it is considered worthwhile to give you an early opportunity to comment on the proposed approach to surface water management on the solar farm development.

We would welcome a written response from your flood and water management team to agree the principles and methodologies set out in the attached document. A follow up meeting or phone call could be arranged if this would be beneficial to discuss any outstanding matters.

You can contact me on [redacted]@pfaplc.com and my mobile number is 07511 084888 if you wish to discuss this request.

Kind regards

Ben Fox *BSc (Hons) MCIWEM C.WEM CEnv*
Associate

Transport Planning / Highways & Infrastructure Design / Flood Risk & Water Management

PFA Consulting Ltd, Stratton Park House, Wanborough Road, Swindon SN3 4HG

T: [redacted] **:** [redacted]

Rebecca Smith

From: Customer.Services@northyorks.gov.uk
Sent: 16 April 2023 15:42
To: Ben Fox
Subject: The proposed development of a solar farm

Good Afternoon,

Thank you for your email regarding The proposed development of a solar farm located to the south west of the village of Camblesforth.

Your case reference number is: 101009919357

The contact details for the department you require are; https://www.nybcp.org/ enquiries@nybcp.org
01347 820600

Kind regards
Emma Brown

North Yorkshire Council
Customer Services Team
Website: www.northyorks.gov.uk

Rebecca Smith

From: donotreply myaccount [redacted]@northyorks.gov.uk>
Sent: 12 April 2023 15:15
To: Ben Fox
Subject: North Yorkshire Council - contact us

NORTH YORKSHIRE COUNCIL

Thank you for contacting us

Dear Mr Ben Fox,

We confirm that we have received your question.

You told us

Subject
Flooding

Sub topic
Flood and water management

Response required
Yes

Contact type
A question

Title
Mr

Name
Ben Fox

Email
[redacted]@pfaplc.com

Telephone
[redacted]

Address
[redacted]

Your comments
Good afternoon PFA Consulting are advising Helios Renewable Energy Project on

flood risk and surface water matters. The proposed development is a solar farm located to the south west of the village of Camblesforth The Proposed Development has an expected energy generating capacity in excess of the 50MW threshold for onshore generating stations in England and therefore constitutes a 'nationally significant infrastructure project' (NSIP). Accordingly, Enso Green Holdings D Limited, (the Applicant) intends to make an application for a Development Consent Order (DCO) to authorise the Proposed Development. The DCO will include a description of the Proposed Development and will be accompanied by an Environmental Statement (ES). The Planning Inspectorate reference is EN010140. As part of the DCO process we would like to engage with the flood and water management team in North Yorkshire Council to agree the approach to surface water management on the site. The site will remain a predominately greenfield following the development of a solar farm and as such a proportionate approach to surface water drainage should be taken based on Natural Flood Risk Management principles. We have produced a 'Solar Farm Surface Water Drainage Strategy Principles' document which we would like your view on in advance of the PEIR (draft ES and FRA) being produced. Please can you provide a contact name and email address to enable this pre application engagement to commence. You can contact me on [redacted]@pfaplc.com and my mobile number is 07511 084888 if you wish to discuss this request. Kind regard Ben Fox

What happens next

You should receive a response by email within five working days.

Further information

Please do not reply to this email as it comes from an address that is not monitored.

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Give us your feedback

We welcome your feedback about how useful you have found contacting us online.

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Kind regards,
North Yorkshire Council
www.northyorks.gov.uk

steps to ensure that they are actually virus-free.

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