Submission ID: 32701

I would like to register to comment both as a local resident and as a representative of the HALT local campaign group.
I would like to submit comment in relation to:
ISH1 5a) Socio & Environmental Matters
• BMV land use
I spoke as a representative of the HALT campaign group, which as explained stands for Helios Agricultural Land Threat, it will therefore come as no surprise that one of the main concerns of our group is the threat to food security through BMV uptake.
NPS En-1 advises that the use of BMV agricultural land should be minimized, with a preference for the use of poorer land. Enso seem to be taking the opposite approach. They may have reduced the overall size of the site from the original proposal but the percentage of BMV land to be taken up has increased from 94% to 96%.
Enso's response with regards to this was basically that it is all BMV land in the Selby area and so that is that, and that obviously as such all the land withing their radius will be BMV land, so there is nothing they can do about it. However, as stated by NY Council, with this in mind is Selby really the best place to locate such a large solar farm. It is blatantly obvious that the only consideration being taken into account is the close proximity to the grid connection at Drax (ISH1 4a iv) Limitations Related to Grid Connection)), for ease and a reduction in costs. As stated, during the meeting, Drax is not the only grid connection in the country. If government policy is to be worth the paper it is written on then surely an area accounting for 96% BMV land (Enso's own survey results) should be avoided at all costs.
At the first public meeting with Enso, an Enso representative was asked which other areas had they looked at in terms of location of the project, and we were told that there weren't any other areas as this was the only viable option for the grid connection, which simply is not true. I would like to see Enso's evidence of having examined other lower BMV areas at length, and not just for locations around Drax.
The government Food Strategy (June 2022) stated that In the UK, we produce around 75% of what we consume. That has been broadly stable for the past 20 years and within the Food Strategy there was a commitment to keep it broadly at the same level in the future. How will this be possible with such large areas of BMV land being taken up?
This is simply going to add to the level of imports required and costs to the consumer. At a time when we are seeing the consumer already facing price hikes due to poor crops, it seems to highlight how important this good agricultural land is to our food security as a nation.
• Cumulative impact
The Helios proposal alone is 14 times the size of the main village it will impact upon, Camblesforth and that is before we consider the cumulative impact of the 2 solar farms already approved at Camblesforth, and another on the outskirts also proposed.
There are concerns locally that if the area in question is not used for a solar farm then it will be used for housing. This fear stems from the fact that we have already seen a number of housing developments either having already happened or proposed in the local area. However, under the current local plans, the area in question, sits outside of the development limits. This is likely due to the fact that it sits on Flood Zones 2 and 3a – medium to high risk land.
I would like to see the full impact of all these solar farms and housing developments locally being viewed as a whole and not in isolation. Not all of these have been considered within the Enso report on Cumulative Impact.
• Effect on soil & reversion to agriculture at the end of the project
Enso suggested that removing land from agricultural use for 40 years would benefit the soil health and quality. I would ask, are we being given the true picture or are we being "green washed" by the solar producers.
A Welsh Government Report states the opposite to be the case with the main impact being deep soil compaction resulting in the loss of versatility of BMV agricultural land, this can vary from very minimal and short term to severe, which possibly cannot be rectified.
Batey (2009) refers to 30 years for a compacted soil to recover.
Hakansson (1988) reported that compaction may be very persistent in the subsoil and permanent.
Nawaz et al (2012) concluded that soil compaction is rapid and easy to create but it can be years before the soil is recovered.
Choi (2020) reported on the possibility of run off from solar panels causing compaction of soils at the base of the panels. While there may not be a significant increase in run off, small channels will have formed with potential for soil loss. This problem is likely to be more severe in erodible soils such as sandy soils, which as Enso have acknowledged within their soil survey, make up a large proportion of the area in question.
Are we just being presented with the positive picture that the applicant wants us to see, whilst completely ignoring the long-term potential damage that we could be facing?
ISH1 4d) Decommissioning
The finance available for the required decommissioning and timings of these operations may also factor on reversion to agriculture. When asked about this Enso had no information that they could provide on bonds in place.
ISH1 4a i) Lifespan of the Proposed Development
I think not only should we consider that 40 years is an extremely long time, pretty much the rest of our lifetimes, for something to be considered as temporary, but we also have to consider that solar panels and batteries are not likely to last the 40 years of the project, with a maximum life expectancies of solar panels being around 25 years and the batteries around 10-20 years, if maintained properly. Replacement costs and ongoing maintenance costs and implications also need considering. This also has implications for further traffic impacts (Outline Construction Management Plan (CTMP) AS-006) and maintenance during the operational phase which does not appear to have been mentioned.
• ISH1 Outline Battery Safety Management Plan APP-119
In the initial public meeting with Enso it was mooted that there would be 50 shipping containers of battery storage, however, at the next public meeting we were told this was more likely to be 100. There does not appear to be any confirmation of number of shipping containers of battery storage, invertors, etc. within the documentation. I would be very keen to know exactly how many there will be. In much the same way, there is no mention of the exact number of solar panels that we can expect to see. I would like these questions to be put to the applicant.
The BESS proposed is in very close proximity to the houses on both Hardenshaw Lane and Chestnut Court, which sit on

the edge of the village of Camblesforth. This brings huge concerns to those living closest, as the potential risks of fire and air pollution as a result, very much make us sitting ducks. If there were to be such a fire we can expect that highly toxic gases such as Hydrogen Fluoride would be emitted. This can spread at dangerously high levels over distances of 1-2 miles, even without taking into account the wind factor (we see a prevailing wind directly over this area that would potentially take such pollutants straight to the main village of Camblesforth).

[redacted] has said that battery storage systems are likely to have at least one fire during their lifetime. He also mentioned that bigger facilities and those in place for 40 years are likely to have more than one fire. It is said that with demand for grid scale storage systems growing 30% annually up until 2030, the number of BESS fires is set to go up exponentially. To make matters worse, it has also been reported that 26% of battery storage systems have fire detection and suppression issues, while 18% also had issues with thermal management systems. Mitigating against the fire risk threat, is not only ensuring that the batteries themselves cause a fire, but also that fires starting around other components do not spread to the battery rack.

With all this in mind, it is very concerning that in the November 2024 report on a Common Ground Statement between Enso and North Yorkshire Fire and Rescue Service nothing appeared to have been accepted as agreed, NYFRS position was not confirmed on any aspects and Enso were not able to supply full details of the detection, monitoring and suppression systems. How can any discussions, in terms of approval, take place when the most critical safety aspects are not even known?

When asked about the location of the BESS, the Enso representative informed us that the position had been selected as it was central to the site. Although I appreciate that

BESS should be located with due considerations of impact on communities, sites and infrastructure. Prevailing wind directions (which we experience in this location) should be factored into the location of the BESS to minimize the impact of a fire involving lithium-ion batteries due to the toxic fumes produced.

Enso recognize in their documentation that the infrastructure such as BESS and the onsite substation do have the potential to create noise and have been located towards the centre of the site, away from residential properties for this reason. Hardenshaw Lane and Chestercourt lie on the outskirts of the village, they are still homes to a number of residents, and yet as residents, we do not appear to have been considered at all, our safety or well-being in terms of noise implications, do not appear to matter, nor those of the wider Camblesforth community, who could also be impacted upon if a fire were to happen.

Enso state that it is not possible to declare ALARP “as low as reasonably practicable” in terms of weighing a risk against the trouble, time and money needed to control it. ALARP is a fundamental concept in UK Health and Safety law.

I would like to ask Enso why our lives, as local residents, and well-being, do not matter?