

Submission ID: 32651

Please find attached a PDF copy of my oral submission with additional points I wish to raise

## **ORAL SUBMISSION FOLLOWING OPEN FLOOR HEARING (OFH1)**

### **1. FAILURE OF THE APPLICANT TO CARRY OUT ITS STATUTORY DUTY TO COMMUNICATE AND CONSULT WITH LOCAL RESIDENTS**

Upon making a decision to plug into Drax, as opposed to other grid networks in the UK, and drawing its 5km circumference, the Applicant appears to:

- Show total disregard to the fact that many people live within the search circumference and therefore in very close proximity to this industrial scale proposal
- Ignore the fact that a vast number of solar farms and grid connections are already in place or have been agreed in this relatively small area
- Completely dismiss the fact that 98% of land is high quality agricultural land, further justifying its position at the Issues Specific Hearing (ISH1) by waving a recent report, Land Usage in England, declaring “this proves the Government isn’t interested in food security”!

It is the first point I wish to elaborate upon regarding the human element in this otherwise hugely economic, technical and political decision-making process.

I suggest that the vast majority of residents in the local area directly affected by this proposal are oblivious to its existence and, if they are, are completely unaware of its nature, extent and enormity.

Only a minority who have access to Facebook (AND are aware of the HALT Selby Area Solar Farm and Battery Storage Facebook page) are up to speed with what is proposed. Hence:

- The majority are totally unaware
- Many may be aware but do not appreciate the scale and impact
- Some believe it is already happening so ‘What’s the point’, mis construing the work already starting on one of the two already approved solar farms in Camblesforth
- Some have been misinformed that it is ‘either the solar farm OR housing development’, which is inaccurate as the land in question is outside of the development limits for Camblesforth and is on a flood zone 2 & 3

The main reason for this is clear. The Applicant has paid lip service to its statutory duty to communicate and consult with local residents, evidenced by:

- Over 2 years ago an open meeting was held in Camblesforth, advertised via a leaflet drop (circulation unknown but it did not cover surrounding villages in close proximity) and posters erected on some lamp posts and flimsy hedgerow stakes in the village
- The Applicant was unable to answer many questions posed to them at the meeting
- Attendees were encouraged to provide feedback via a leaflet (copies of which had been left at the rear of the room), or online.
- NO response was received to any of the feedback submitted
- Those living close to the proposed site (and who would be most impacted), were offered individual meetings in their home to share any concerns. NOT one such meeting took place.
- The Applicant advised that it would be happy to liaise with local Parish Councils. Again this did not happen, in fact Camblesforth Parish Council invited them to 3 council meetings and they refused to attend ALL 3.

**QUESTION What steps are intended to fully inform, involve and engage residents affected by this life changing proposal and fill this massive vacuum?**

## 2. CONTRIBUTORY FACTORS AFFECTING THE LACK OF PUBLIC ENGAGEMENT IN THE PROCEEDINGS

- As previously mentioned, the majority of people living in the vicinity are oblivious to the nature, extent and enormity of this project and its cumulative impact, added to the numerous other projects already completed, approved or underway.
- The Hearings are being held in the daytime of a working week, which means that many were unable to attend due to work commitments. It is appreciated that people can still make comments online, but this is unclear and the instructions are opaque and inaccessible. Also unless one attends the hearings, it is almost impossible to navigate through the forest of paperwork presented.  
NB. Some of the HALT group members missed the hearing (OFH1) as they hadn't found its details buried in the 40+ pages of agenda papers!
- Many who are aware of the project share question whether this examination phase is a fruitless exercise. This Government appears to prioritise its net zero target by 2030 above all other priorities, including food security. The SoS, Mr Miliband, who will ultimately make the decision, has also clearly demonstrated his zealous desire to achieve it at all costs. He recently cited that NESO endorses the Government's ability to achieve this target, but failed to add that this can only happen if he doubles on shore wind capacity, triples off shore wind, builds 600 miles of power cabling and most importantly QUADRUPLES solar power. This cynical view was further reinforced by the Applicants' declaration at the ISH1, that they had proof that the Government is not interested in food security.  
Perhaps we can ask the Applicant to clarify how they reached this conclusion?
- The MP for Selby and Ainsty (Keir Mather) who one would normally rely upon to lobby on behalf of his constituents at a national level, especially as there is a majority view against this proposal, has accepted the post of deputy whip; a role in which he has to toe the Government line and ensure Labour colleagues do too. He has stated that he is purely a conduit for communicating constituents views.  
Consequently, we have lost our only Parliamentary voice and the HALT group have lost their main route to the government to express the strength of opposition and promulgate the issues to others, who remain blithely unaware of the impending impact of the project. One such example is a meeting that Mr Mather held in Carlton for local residents but chose to do so at 10am on a week day when few were able to attend.

**QUESTION Mindful of the above and having found out at the OFH1 that 98% of DCOs are approved, it begs the question are we being presented with a fait accompli?**

## ORAL SUBMISSION FOLLOWING ISSUE SPECIFIC HEARING 1 (ISH1)

### Agenda Items:

#### 4a) Scale and Proposed Development and Generating Capacity

With regard to the panels:

1. I understand that the type of panels, and *especially in the numbers proposed*, have not been installed elsewhere in this country. Hence the impact, efficacy, safety and lifespan have yet to be determined?
  - The Applicant cited Cirencester as a UK location where tracking panels are being used, but if they were referring to the site on Witpit Lane, it is hardly an appropriate comparison as it is only a 23 MWp solar farm, substantially smaller than the 235 MWp farm being proposed.
  - Are we therefore guinea pigs for this type of development, without the full impact and implications being known?
2. I refer to the recent destruction of hundreds of solar panels at the Porth Wen solar farm in Anglesey on 9<sup>th</sup> December, caused by Storm Darragh and a previous point raised by Cllr [REDACTED] that 'one thing that can be guaranteed in the flat area of Camblesforth is wind'. Such storms are likely to grow in frequency and intensity so may I ask:
  - How resistant are the panels to such inclement weather conditions? (Although I am sure that EDF assured the Planning Inspectorate that their panels were able to withstand such conditions prior to approval!)
  - Is there a greater risk of damage due to the size and height of the proposed tracking panels?
  - What is the plan should such a catastrophe occur to avoid the ground and water supplies being contaminated by the materials within the panels?
3. Please can I also ask the Applicant, what is the total number of panels to be installed?

#### 4b) Battery Energy Storage System (BESS)

1. Please can the Applicant confirm the MAXIMUM number of shipping container sized Battery Storage Systems they are proposing. In the early stages, 100 was mooted but this number has failed to appear on more recent documents.
2. Please may I log a question for the appropriate time in the proceedings. What will be the maximum noise level for each of the BESSs (to include all the cooling systems & condensing units to the batteries, the Power Conversion System and the Transformers) and the maximum noise level from all the containers combined?

#### 4d) Decommissioning

##### i) General principles and controls

1. Solar farms are supposed to be time limited and reversible back to land use. If a return to farmland is not contemplated until after a 40-year period, this will surely have an irreversible and negative impact on the land and local communities?  
Selby coal field developments went through planning 40 years ago & sites like Wistow, Stillingfleet & Gascoigne Wood were approved with planning conditions attached that required the developments be returned to agricultural use when they were no longer needed.

All mining in Selby ceased in 2004 but the sites are now being redeveloped for other industrial purposes. NO LAND has been returned to agricultural use.

Isn't it therefore highly likely that the Helios site will never return to its original purpose?

2. Please can I log a question for the appropriate time in the proceedings; for the Applicant to state how they intend to dispose of the panels and BESS's when decommissioned and also when any fail or are damaged within the 40-year period?

### **5a) Socio-economic matters**

i) The approach to identification of the Best and Most Versatile (BMV) agricultural land

1. As the 5km search area showed 98% of the land likely to be used is best and most versatile, surely consideration should be given to an alternative grid location where such a large area of high-quality land is not an issue?
2. As wind energy is proved to be the most effective source of renewable energy, should the use of wind turbines be considered as a more suitable alternative? It would ultimately be cheaper, use less than 1% of agricultural land, be less disruptive, remove most of the concerns re water pollution, potential fire, ecological & biodiversity etc. One thing that can be guaranteed in this area is wind – more so than sun!

ii) Cumulative effects arising from BMV land

The claim of NIMBYism "Not in our Backyard" certainly cannot apply in this case!

- Drax power station, the largest plant in Europe on our doorstep (since 1974)
- 180 acre solar farm approved in Camblesforth
- 140 acre solar farm in Drax approved
- 100 acre solar farm to be approved in Hillam
- 2500 acres of solar farms proposed over 5 sites Light Valley Solar just announced

With this massive development of 1176 acres, it will amount to over 4500 acres of prime farmland being taken out of the food supply for the next 40 years.

The UK's food system is already under pressure from climate change, labour shortages and international supply chains issues. As these pressures grow, the need for self-sufficient agricultural land increases. Sacrificing prime farmland for energy production, will greatly weaken long term food resilience.

This is of national significance to the country's food security at a time of such uncertainty across the world and ought to be considered above current political party priorities.

There is also the cumulative impact of all the negative factors pertinent to this development in relation to disruption, noise, water quality, nature conservation and biodiversity issues, traffic generation, risk of flooding, potential fire risk and resulting pollution, health & wellbeing of residents and the sheer dominance and overbearing nature of this development that will radically change the character, rural nature and community spirit of the area.

### **Surely enough is enough?**

iii) Agricultural use of the land during the operational phase

1. Will the tracking panels negatively impact sheep grazing on the land once operational and is that the Applicants intention?

2. Is there any evidence of animals grazing beneath such panels elsewhere?

## **5b) Biodiversity and Ecology**

### **i) The approach and findings in relation to ecology**

1. Around the entire site of the already approved solar farm on Camela Lane in Camblesforth, a 6-foot high wire mesh fence has been erected, the apertures of which do not allow larger creatures such as badgers, deers etc, to pass through.  
From an ecological perspective, the migration of animals is already disrupted at such an early stage of the development.  
In further discussions at the Hearing, the Applicant stated that they are proposing to incorporate mammal traps in the fencing and that there is no evidence of the fencing impacting deer. How can you prove a negative? Also how would they know at such an early stage of solar farm development on rural land? The welfare of these animals is of grave concern.
2. Large scale solar farms of this nature can disrupt ecosystems and water cycles, indirectly affecting food production on surrounding land. They can later alter local micro climates and biodiversity, impacting pest control, pollination and soil health – factors critical for productive farmland. How is the Applicant to safeguard against all these issues?

## **5d) Water Environment**

### **i) The approach to flood risk and drainage...**

- 1 The Applicant spoke about mitigating measures to deal with flooding but what happens in the event of a fire where toxic chemicals are involved as well as huge quantities of water? How will they ensure that the residue does not leach into the soil and land beneath the BESS's? Will the BESS container systems be designed assuming worst-case runaway and that of all cells, modules, racks within the container?