

### Submission for Deadline 2 (D2)

On behalf of myself and my household (3 persons) – as concerned residents and members of the HALT Local Campaign Group

In relation to Rule 8 Letter:

The HALT group does not appear to have been included as an interested party, even though, registration was made for representation and I spoke on behalf of the group of 800+ members at the hearing. As such, an invitation to submit written representations was not received nor was a statement on common ground made available to be viewed by the members of HALT. The group is made up of local residents, many of which have concerns, in my view these are the very people who need to be airing their views in terms of principles of agreement or disagreement, as they will be the very people impacted upon within the direct communities.

The timetable for submissions for D2 was set at 13th January 2025; The Rule 6 letter requested that the applicant seek to engage with interested parties, in terms of the Statement of Common Ground process and yet the HALT committee heard nothing, even though the applicant is aware of the group and their concerns. Even the local Parish Councils in the areas that would be affected, only received requests in line with the Statement of Common Ground Process just days before the deadline, with some not even receiving an accompanying Statement of Common Ground with their requests to engage in the process.

It is my understanding that this process is to demonstrate that the plans are based on effective and ongoing cooperation and that the applicant has sought for the plans to be agreed with interested parties, such as the Parish Councils. To not even supply the statement to the relevant councils and to give mere days for comment, when it is commonly known that it will need to be discussed by the councils during their scheduled meetings, which tend to take place monthly, does not give the impression that the applicant genuinely wants to engage the Parish Councils.

West Bank and Hirst Courtney Parish Council were not even included at all in the earlier presentations by Enso and have only now been included in the process, even though the proposed development would directly impact on their residents, going right up to the edge of back gardens in some places. Yet Enso contacted several councils far outside of the area, for their opinions, which not surprisingly came back showing as no concerns, as the project proposed is not in their area, so would have no impact. I may be cynical but perhaps this was intentional.

### ISH1 Discussions & Action Points

#### No. 1 Degradation of Panels

This action point referred to how degradation of panels was accounted for in terms of generating capacity.

I would like to visit this on another front, and that is in relation to the finance planned for replacements and maintenance of both the solar panels and batteries, as we appreciate that neither is likely to last through to the 40 year end date of the project proposed.

I would also like to see more detailed information on the replacement and maintenance aspects, as this is not necessarily the replacement of just one or two panels or one battery, this is likely to be happening in bulk and therefore is more like an addition to the construction phase, rather than a general maintenance aspect, in terms on impact to the environment and local residents.

#### No. 7 Flood Risk

This appeared to be somewhat skimmed over relatively quickly, and yet the local area has seen flood warnings just a few weeks ago, so this is a very real risk that I believe requires far more consideration, as the land in question is of Flood Zones 2 & 3.

#### Unaccompanied Site Inspection by [REDACTED] 02/12/24 & 05/12/24

I believe that the site visit will have allowed the inspector to see, first-hand, just how close the BESS is proposed to be in relation to residential properties on Chester Court Road and Hardenshaw Lane and the further dangers that the prevailing wind poses, to the residents of these streets and the villagers of Camblesforth, should there be a fire. With this in mind I would welcome a further review of this aspect.

It is not even clear how many batteries there will be, at the first meeting 50 were mentioned, at the next public meeting this figure had doubled to 100 and yet there are no figures given within the documentation, that I can see as to the final number of batteries proposed. There are, however, statements such as declaring that ALARP cannot be met and other statements saying that details are unable to be shared in terms of suppression systems, at this time. I would very much like to know specifics, as I cannot see how decisions can be taken without these. I would also be keen to know more on the Fire Department's views on such a large proposal, so close to residential properties.

If this proposal were to be approved, I would ask for residents health and safety to be put at the forefront and for any BESS to be located not centrally for ease, and cost reduction, but as far away from residential properties as is practicable.

#### Cumulative Impact

There have been further solar farms proposed in recent months in the local area, in addition to this proposal and the 2 already approved. I would like to see these further proposals (at least 3) taken into account within the cumulative impact assessments.

Traffic Management Plans were discussed at ISH1, again I would like to see these additional proposals taken into account and not just viewing the impacts of this proposal in isolation. We are seeing more proposals popping up in a race to connect at Drax, are we even assessing the true picture when we don't know if the race is now finished, or is further projects will also come to the surface; I believe the latter to be highly likely. Until the full picture is known how can the cumulative impact on traffic, BMV, etc. be truly assessed.

#### Community Benefits

There do not appear to be any benefits to the local community and/or residents most affected, even though they will feel the brunt of this proposal if it is to go ahead, on both a 24/7 day-to-day aspect but also in terms of an impact on their property values.

The applicant does not intend to consider any community benefits until after the DCO is granted, surely this should be discussed and agreed prior to consent, as who is to say it will happen at all if it is not tied in.

#### Biodiversity Net Gains

Species such as sheep and meadow flowers proposed to be added are alien to the area. Should there not be more weighting on the net biodiversity impacts, in terms of natural biodiversity. It wasn't even clear at the ISH1 if the applicant does intend adding sheep, so does the biodiversity net gain stated actually hold water. Is there a clear management plan going forward, as meadow flowers are unlikely to flourish without this?

#### Screening

Rabbits are rampant in the area, I can testify on this aspect personally, as their burrowing and stripping of plants constantly affects our garden. It is all very well planting immature screening but how will this be managed to ensure they are not eaten/stripped in the early stages and thereby preventing growth through to maturity and screened views in 15 years. Will they be replanted if this happens? How will this be monitored and managed?

#### Groundwater Protection

It was acknowledged by the applicant that the proposed site is situated in a Groundwater Source Protection Zone 3 which houses a Principle Aquifer, hence the mention of lining the BESS compounds with impermeable liners, geomembranes. It was stated by the applicant that with this being the case that no infiltration testing was to be conducted of these areas as there is no pollution risk.

Geomembranes have a service life of between approximately 20 – 50 years, this project is to be 40 years in operation, it is therefore possible that the geomembranes may fail during this period.

The Environmental Agency LFES Report (GEHO0409BPNH-E-E)

states that liquids and gases permeate geomembranes as vapours or gases on a molecular scale by diffusion. The rate of permeation it is said depends on a molecular scale by diffusion. The rate of permeation, it is reported, depends on the solubility of the liquid and the diffusibility of the dissolved molecule in the geomembrane.

The report goes on to say that geomembranes are subject to physical stresses during transportation, site handling, installation and during their life. Is there quantitative evidence to establish that the geomembrane will hold up to the stresses placed upon it?

Exposure to chemicals can cause stress cracks in geomembranes. Have the membranes been tested against the chemicals that would be present within the batteries or produced as a result of a battery fire?

The effects of chemical stress, it is stated in the report, may take decades to appear. Will membranes be replaced if any, even small amounts of, chemical leakage take place? And or periodically to avoid such stresses?

Biological attack has been observed with some plasticised geomembranes due to the susceptibility of some plasticisers and other monomeric constituents of the compound to biodegradation.

Attacks by rodents (and similar pests) on the liner system can't be ruled out, according to the Environment Agency, and burrowing activities by other animals can damage the subgrade or protective layers of the geomembranes. Has this been taken into account considering the vast rabbit population, moles and rodents in the area?

Validation reporting for geomembranes should include field and laboratory tests alongside details of remedial action. I would very much like to see details of this having taken place against the real environment, as is.

#### Food Production and BMV Matters

The applicant acknowledged that the vast overwhelming majority of the search area within 5km of the Drax grid connection is good agricultural land, with BMV across the whole search area. With this in mind, and the government policy to avoid BMV land in favour of lower grade agricultural land for such establishments, I believe that it should also be taken into account that Drax is not the only National Grid connection point. If all the land in the surrounding area of Drax is BMV land then surely applicants should be looking at alternative locations that do not host such fertile food producing soils?

#### March Hearing

I would firstly like to thank you for considering the points made above and secondly I would like to register to speak, as both a concerned resident (on behalf of my household) and as a member of the HALT local campaign group, at the March hearing.