

Mr Ken Taylor  
National Infrastructure Planning  
Temple Quay House,  
2 The Square, Bristol BS1 6PN

Dear Mr Taylor,

## **Helios Renewable Energy Project**

This letter expands on the issues raised in my submission of 6 September 2024.

Whilst acknowledging the need for more renewable energy, the planning system should seek to balance that against potential adverse impacts. However, recent decisions by the Secretary of State Ed Milliband risk tilting things in favour of a solar farm free-for-all.

It appears the last remaining serious material considerations against solar farm developments are projects involving (a) the excessive use of BMV land, and (b) cumulative impacts when in proximity to other energy generating infrastructure. The Helios application should be rejected on both grounds.

The previous government's policy towards solar energy was summed up in 2013 by Energy minister Greg Barker, in a speech to the solar PV industry:

*“Solar is a genuinely exciting energy of the future, it is coming of age and we want to see a lot, lot more. But **not at any cost... not in any place... not if it rides roughshod over the views of local communities.**”* (my added emphasis).

Mr Miliband now seems quite determined to 'ride roughshod' over the views of local communities, but consent for Helios would be confirmation that solar farms are also now welcomed in any place and at any cost. In short, all planning constraints would be removed.

## **Use of BMV land**

Helios uses 393.8 Ha of agricultural land, all but 2.7% of which is BMV, according to the applicant's ALC report (PINS Ref: EN010140/APP/6.3.14.1).

In a 2015 written ministerial statement<sup>1</sup> (which is still valid for planning matters I believe) Eric Pickles, then Communities Secretary, said:

*“We are encouraged by the impact the guidance [on the UK's solar photovoltaic strategy] is having but do appreciate the continuing concerns, not least those raised in this House, about the **unjustified use of high quality agricultural land.** In light of these concerns we want it to be clear that any proposal for a solar farm involving the best and most versatile agricultural land would need to be **justified by the most compelling evidence.**”*

Para 2.10.29 of the NPPS for Renewable Energy Infrastructure (EN-3) says:

*“While land type should **not be a predominating factor** in determining the suitability of the site location applicants should, where possible, utilise suitable previously developed land (PDL), brownfield land, contaminated land and industrial land. Where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land avoiding the use of “Best and Most Versatile” agricultural land where possible.”*

The latest guidance from a Commons Research Briefing<sup>2</sup> says:

*“Whilst the development of ground mounted solar arrays is not prohibited on sites of agricultural land*

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1 <https://questions-statements.parliament.uk/written-statements/detail/2015-03-25/HCWS488>

2 <https://researchbriefings.files.parliament.uk/documents/CDP-2022-0051/CDP-2022-0051.pdf>

*classified 1, 2 and 3a, or designated for their natural beauty, or recognised for ecological or archaeological importance, the impacts of such are expected to be considered and are discussed under paragraphs 2.50 and 2.53. It is recognised that at this scale, it is likely that applicants' developments may use **some** agricultural land, however applicants should **explain their choice of site**, noting the preference for development to be on **brownfield and non-agricultural land**."*

The applicant provides a narrative in Chapter 4 Alternatives and Design Evolution, (PINS Ref: EN010140/APP/6.1.4) without offering any 'compelling evidence' for the use of virtually all (not **some**, note) BMV land or even an explanation of their choice. The main driver behind the site's location appears to be the proximity of a suitable grid connection and the applicants self-imposed 5Km distance, nothing more.

BMV land should be used as a last resort after exhausting other potentially available and more preferred land types, as EN-3 suggests, and of which Selby has an excess.

## **Cumulative impact**

The site's proximity to Drax is, in my opinion, a compelling reason for NOT approving the project precisely because of the cumulative impacts set out in National Policy Statement for Renewable Energy Infrastructure<sup>3</sup> (EN-3) paragraph 2.10.26:

Where a site is based on "nearby available grid export capacity" as this one is, the applicants should:

*"... consider the cumulative impacts [plural, note] of situating a solar farm **in proximity to other energy generating stations and infrastructure**."*

The authors of EN-3 clearly recognised that the limited number of suitable high-voltage grid connections would inevitably lead to many projects being tightly clustered around certain locations – like Drax – and expressly say the impact of many projects in one location should be 'considered'.

The applicant lists a number of schemes (PINS Ref: EN010140/APP/6.3.15), 13 of which are definitely "energy generating" of one type or another, that are extant, under construction, recently approved or in the process of being determined.

Note also the list doesn't actually include Drax Power Station itself, the UK's largest renewable energy source.

Since then, nine (9) further applications have been submitted for well over 700MW of solar farms in the Selby district alone, demonstrating the cursory nature of the applicants search for alternative sites. The vast majority are on lower grade agricultural land and, as far as I know, none of the sites were identified for development in the Selby 2013 Core Strategy or the latest draft Local Plan

These are to North Yorks CC:

- Quintas Cleantech: 49MW solar farm (SF) plus a 10MW battery storage system (BESS) on 58.9 Ha of farmland East of Broad Lane Cawood (NY Ref: ZG2024/1324/SCN).
- Quintas Cleantech: 30MW plus a 10MW BESS on 55 Ha of farmland either side of the A163 Market Weighton Road at Barlby (NY Ref: ZG2024/1323/SCN).
- Greenergy Renewables: Solar farm and associated BESS infrastructure on 38 Ha of farmland (93% BMV) at Port Jackson Farm, off Selby Road, Camblesforth (NY Ref: ZG2024/1074/SCN).
- Ivegate: 10MW on 13.97 Ha of land off Weeland Road Knottingley (NY Ref: ZG2024/0936/FULM).
- Pegasus Group: 49MW and co-located BESS on 87 Ha of BMV agricultural land at Scalm Park Wistow (NY Ref: ZG2024/0605/SCN).
- ABEI Energy: 13.3MW on 17.5 Ha of land to the Southeast of Little Fenton on Sweeming Lane, Little Fenton (NY Ref: ZG2024/0579/SCN).
- Noventum Power: 49MW together with ancillary development on 62 Ha of agricultural land near Hillam Grange, Austfield Lane Hillam (NY Ref: ZG2023/1271/FULM).

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<sup>3</sup> <https://assets.publishing.service.gov.uk/media/65a7889996a5ec000d731aba/nps-renewable-energy-infrastructure-en3.pdf>

- One Planet Developments: Solar farm together with associated infrastructure on 24.78ha of farmland at Nordens Barn Farm, Common Lane South Milford (NY Ref: G2023/0481/SCN).

Additionally, two projects above 50MW have been submitted to NSIP:

- Light Valley Solar for a 500MW array on 1,066 Ha of agricultural land near Monk Fryston using a grid connection at Monk Fryston sub-station.
- Mylen Leah Solar for a 500MW array and BESS on 1,100 Ha near Holme on Spalding Moor connected to the Thornton Greener Grid Park substation.

I note that we have yet to see a single solar PV project refused on any grounds, and as things stand, nor do I expect to.

Other rural landowners in the district will I am sure want to take advantage of having a guaranteed income of £700-£1000 per acre, per year and the steady flow of applications can only increase. There is obviously no shortage of better, smaller projects or poorer quality, easily available, agricultural land, and therefore no reason at all for Helios to use much needed BMV land.

Camblesforth will soon have energy generating infrastructure to the north, south and east, all close to the village boundary. Helios to the west would close a ring around the community. I daresay there is nowhere in England surrounded by more and more different types of “energy generating stations and infrastructure” or at a higher density.

Helios uses no PDL, brownfield, contaminated or industrial land as suggested by EN-3 and virtually zero low grade agricultural land. I don't believe this is what the planning authorities intended, and certainly not in an area already overwhelmed with energy infrastructure.

If Helios is approved it is hard to see what would prevent *any* solar farm of *any* capacity being approved in *any* rural area in England and on *any* agricultural land classification however productive and valuable it is, and notwithstanding the amount of existing energy infrastructure already in place.

There is a growing presumption that approval will automatically follow *any* solar farm application which risks fuelling the kind of free-for-all that we are already starting to see.

There has to be some reasonable limit to what is acceptable.

### **The applicant**

Finally, Enso Green Holdings D Ltd is merely a front for Macquarie Group Services Australia PTY Ltd, a venture capitalist business known as the “Vampire Kangaroo” with a questionable record of public utility ownership.

In 2017 for example, while paying little or no UK tax, Macquarie left Thames Water suffering under a £10.5bn debt mountain after extracting £2.8bn in dividends and loan interest. Thames Water is now close to collapse. Macquarie are unlikely to put social responsibility above profits.

I would be extremely wary of any assurances provided by EGHD about complying with any planning conditions, and if you decide to recommend approval, I urge you to be similarly sceptical.

Yours Sincerely

Graham Rawlings