Submission ID: 33216

Please find attached my written submission regarding a number of issues arising from the Issue Specific Hearing1 (ISH1) and in response to parts of the Applicants Written submissions generally.

Submission for Deadline Two 13th January 2025

1. ISSUE SPECIFIC HEARING 1 (ISH1)

1.1 Location

The Applicant has given the impression that Drax is the only viable option for siting this development. Surely this is incorrect?

- There are other grid connections within the UK, that wouldn't have involved removing 476 hectares of land, 96% of which is Grade 1 and 2 agricultural land, and especially when added to the other solar farms approved or proposed in this area.
- There are less impactful alternatives such as brownfield sites and rooftops.
- There are also areas with more annual sunshine hours. Having solar panels on my property, I can say with absolute certainty that the electricity generated for over 6 months of the year is poor due to frequent seasonal cloud cover.

The Applicant states in CPC-01 (Principle of Proposed Development) that the development "will provide a significant amount of low carbon electricity over its lifetime"

- What do they class as significant?
- How does this compare with other parts of the country with more annual sunshine hours?
- What research has the Applicant carried out in relation to this factor? May we have sight of these source documents?

We surely must weigh up the benefits of achieving renewable energy and the likely return especially against the devastating impact of industrializing the rural landscape and altering the character of the area, reducing its aesthetic and recreational value for residents/visitors.

The cumulative impact of solar farms, battery stores and housing developments already approved and proposed in this area, and all at the same time, is going to have a significant impact on traffic road safety and volume, noise and disturbance.

1.2 Use of Best and Most Versatile Land

The Applicant gives the impression that it is unfortunate that the land designated (within a 5km circumference) happens to be Grade 1 and Grade 2 land. Surely convenience (or just because the land was offered for development) shouldn't override every other factor especially when the negative cumulative impact is so huge and far reaching?

In justifying its position, the Applicant has previously referred to the Environmental Statement (chapter 14 Soil and Agricultural Land [APP-03] paragraph 14.5.85) that the Government Statement (Food supply & Food Security, Defra) at the end of 2022 confirmed "there are no food security concerns at the present time"

Surely the operative words are "present time"?

Since 2022, there have been a vast number of ongoing and proposed solar farms across the country, especially in Yorkshire, that are replacing our high-quality agricultural land and raising national concern as to food security.

We currently import 46% of the UK's food and sacrificing farmland for solar farms is a short-sighted approach, particularly given the increasing uncertainties of worldwide supply routes.

This surely demonstrates that agricultural land is more valuable than ever, considering demand for sustainable food production, coupled with climate pressures?

It should be noted that the country was perilously close to power blackouts last Wednesday (08/01/25) as the cold weather increased predictable demand, wind farms were becalmed with minimal returns from solar farms, obviously producing nothing after sunset. As a result, the energy companies were forced to pay inflated prices from abroad with wholesale prices spiking at £1352 per mW hour, TWENTY times the

average cost. Also, on the 10/01/25 the energy company, Centrica, frighteningly revealed that the country had less than ONE weeks supply of gas demand currently in storage.

The massive expansion of, and a proportionate future reliance on, wind and solar, of which Helios is just one supplier, means the country will not survive the cold, windless, sunless weather conditions we have, especially in Yorkshire.

Losing invaluable farmland to a renewable energy that is so unreliable is not viable and is economically, ethically and morally wrong.

NB British farmland also plays a key role in carbon sequestration, biodiversity, and flood prevention—ecosystem services that are critical in the fight against climate change. Covering these areas with solar panels risks disrupting these essential benefits, creating unintended environmental consequences.

1.3 Tracking Solar Panels

Hopefully from questions raised prior to Deadline 1, the Applicant will have confirmed the number of solar panels proposed.

Also in response to my question, the Applicant will have provided details of the locations where identical panels of the size and nature and of similar numbers are used (especially as they have stated they are "widely used across the UK"). Cirencester was put forward as an example at the Hearing, which is a much smaller development and not comparable.

Please can the Applicant now confirm the following:

- How many string inverters are proposed which feed into the power transformers?
- What is the level of noise in dBs, from each converter and from each solar panel?
- What would be the cumulative dB measurement of noise levels emitted from the site as a whole?
 A string inverter can generate a sound pressure level of 74dB at 1m, which is not noisy in itself but when there are hundreds of inverters, coupled with the transformer units, it can rise to a significant level of noise
- Will these levels be within the permitted limits for residential areas of 45dB at night and 55dB for daytime?
- What measures are proposed to mitigate the potential problems arising from noise?

NB Research into the long-term effects of noise pollution from solar farms is still in its infancy, so please can the Applicant avoid stating that there is no research to support that there is a problem! The constant hum from inverters and transformers, especially in quiet rural areas, can be particularly noticeable and consequently a nuisance.

Ongoing studies are likely to provide more insights in the coming years and we must ensure at this stage that our local population is not going to be subjected to unacceptable disturbances, especially mindful of the number of BESS's proposed too, so that we retain the peace and tranquillity of this rural community.

1.4 Battery Energy Storage Systems (BESS)

In my submission to meet deadline 1, I asked the question "Please can the Applicant confirm the maximum number of shipping container sized BESSs they are proposing?"

If this number has now been provided by the Applicant I would like to ask:

- What is the level of noise in dBs from each BESS?
- What would be the cumulative dB noise levels emitted from the whole site?
- Will these levels be within the permitted limits for residential areas of 45dB at night and 55dB for daytime, especially as there are properties close by?
- What measures are proposed to mitigate the potential problems arising from noise?

It is concerning that the Applicant has previously stated that it is not possible to declare as low as reasonably practicable (ALARP), a fundamental concept in UK Health & Safety law, in terms of weighing up a risk against the trouble, time and money needed to control it.

Does this demonstrate that the Applicant does not want to go to the time, trouble or expense of meeting legal requirements that exist to mitigate against excessive noise pollution which otherwise would cause serious harm to the health, safety and wellbeing of those living within the vicinity?

2. RESPONSE TO THE APPLICANTS WRITTEN SUBMISSIONS

2.1 Property Prices

The Applicants response (KM-01 page 92) is "there is no empirical evidence to suggest that the presence of solar farms affect nearby property prices" and "in any event is not a material planning consideration". Firstly, research into the impact on house prices close to solar farms is still in its infancy but common-sense dictates that transforming your vicinity from a tranquil and peaceful village in the countryside to an industrialised sized solar farm and battery storage area (with the construction and ensuing operation and ongoing maintenance) will significantly impact property prices and the ability to sell.

It is already becoming an issue!

A friend currently selling her house received an apparently now routine question from the buyer's solicitor asking "we note from the environmental search that the property is within 2kms of existing or proposed solar farms. Please can the seller confirm that this has not affected the property"

Secondly, this is not a normal planning application! It is of great magnitude and will fundamentally change the environment, landscape, character and lifestyle of residents in the area.

What compensation is to be given to local residents who find themselves in the position of losing money on their property, or their inability to sell, due to this vast development and all the accompanying disbenefits it will bring?

2.2 Health and Mental Wellbeing

On page 17 of the Applicants "Response to Relevant Representations" December 2024, under NYC16 the Applicant states that no significant effects to the population groups were identified.

To date, no research been carried out as to the impact on the mental health and wellbeing of local residents adjacent to a site of this magnitude as there hasn't been a development as huge (or if there has, it is still in its infancy).

Upon what basis therefore does the Applicant make such a bland statement?

The Applicant also cites data that identifies Selby is "performing better in relation to physical & mortality stats and mental health and behavioural risk factors ... than the region of Yorkshire and the Humber and England". Again what does this prove? This data was obviously compiled before the area has and is likely to be transformed into a Solar farm metropolis and therefore has no significant meaning or bearing.

2.3 Community Benefit Contribution

Under NYC-19 page 20, the Applicant is refusing to consider the provision of community benefits until after the DCO is granted.

Based on the Applicants record to date of showing minimal, if any, concern for local residents, "being open to providing" is hardly reassuring!

May I suggest that such benefits should be discussed and agreed at this stage and made a condition of the DCO should it be granted.

3. MARCH HEARING

Please may I register to speak at the March hearing as a very concerned resident and member of the HALT local campaign group.

Thank you for time in considering my submission.