Wednesday ISH2 12/03/25
Lesley Marson speaking as a resident, on behalf of family group, and as a HALT representative

Q1. Can I firstly ask will it be ensured that questions raised at the open floor hearing are responded to by the applicant in writing, as none were answered at the time?

Landscape, visual effect

APP-027 6.1 Environmental Statement Chapter 7 – Landscape and Views

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Comments in relation to points raised by the applicant on this topic: The applicant has stated that they aim to establish more interesting walks – What is more interesting than the country lanes we currently have, with the natural habitats and biodiversity? These are part of the reason why we chose to live here, as have other HALT members. Walking through an industrialised area would certainly not peak my interest.

With regards to the comments made by the applicant on immature planting – I would suggest that this is more to do with cost than anything else. Has the applicant asked the community what they would prefer. I am sure most would prefer mature established planting, as opposed to immature planting that may or may not grow to full maturity for screening in 15 years time.

The applicant mentioned that effects on landscape cannot be avoided due to cumulative effect and impact – Is this not more reason to look at other locations or alternatives?

7.2.3. references that landscape effects arise not only from the sensitivity of the landscape but also the nature and magnitude of change proposed by the development, with 7.2.5. stating that the design of proposed development should aim to minimise harm to the landscape

The CPRE recognise that continuous rows of glass panels completely alter landscape character. Boundaries are changed by security fencing and the intrusion of CCTV. Residential neighbours have the setting of their property altered and industrialized. Peace and quiet is destroyed by industrial grade traffic and light pollution

References are made (7.2.15.) to 'reducing the scale of a project to mitigate the visual and landscape effects of a proposed project. However, reducing the scale may result in a significant operational constraint and reduction in electricity generation output. It is stated that there are exceptional circumstances, where mitigation could have a very significant benefit and warrant a small reduction

in function. In these circumstances, the Secretary of State may decide that the benefits of the mitigation to reduce the landscape and/or visual effects outweigh the marginal loss of function'.

I would like to ask when considering a project of such size in both overall scale and height of panels, that the impact be considered alongside the cumulative impact of the already approved solar farms surrounding the village of Camblesforth, and those proposed in the local area, as this would be a huge burden for one rural community to bare.

Q2. Would this not be a case that warrants the need to draw on the "exceptional circumstances" clause, to insist on a substantial reduction in size, as opposed to the token above ground visible reduction seen?

The Applicant has reduced the overall extent of the Proposed Development, it is said to include specific consideration of local residents. However, a large part of the reduction in size was in the area which was deemed to be for underground cabling and was never going to have an effect on the visual landscape, as above ground equipment or panels were never proposed for this area.

Q3. Only small reductions have been made to areas where panelling was proposed, I would therefore question whether the reduction has had much in the way of impact or consideration of residents?

7.2.16. identifies that 'the scale of energy projects means that they will often be visible across a very wide area. The Secretary of State should judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project'.

The applicant states that the characteristics of the Development means it is comprised of relatively low structures, they recognise that the footprint of the Proposed Development is a key consideration of the assessment. Certainly the footprint should be a key consideration as it equates to over a 1000 football pitches in size and stretches for miles across 47 fields, from one village to the next.

Q4. But as for the structures being relatively low, I would question the sincerity of this statement as the solar panels are not low ground mounted panels, they are tracking panels which reach 3m at highest tilt angle?

The photographic examples shown within the appendices do not, give a true reflection of the panels proposed, these are photographs of low ground mounted panels, somewhat misleading. This is without also considering the other structures which are alien to a rural arable landscape, which include at least 76 shipping containers each at 3.5m in height and an equally huge number of similar sized invertor stations, a control room 5.7m in height and equipment such as Substation equipment such as transformers that at 6.48m.

Q5. I would ask the applicant to quantify their definition of "relatively low", please excuse my cynicism but relative to what, a bus perhaps?

It is also said that the proposed landscape strategy has been designed to help ingrate the Proposed Development and reduce the perception of the built elements in the local landscape.

The landscape strategy, it is said, relies heavily on provision of new boundary hedgerows and improving existing hedgerows, in order to screen the proposed development, but it has been recognised that this would be a radical shift in current landscape management. It is recorded that it is unclear that the method of landscape screening stated could be achieved within a reasonable timescale, or that this alone would be sufficient to reduce adverse effects.

Within APP-027 it is quoted that the height of solar PV panels should not be taller than the existing hedgerows in the area and panels should be screened as much as possible without compromising efficiency and openness where this is a key characteristic of the area. New hedgerows should be established and maintained at a target height relating to local context and scale of development.

I have personally walked the roads around various parts of the proposed area and the majority of hedgerows do not even reach 2m in height.

Q6. So apart from maximising gain, why has the developer selected a panel of 3m in height knowing that this far exceeds the existing hedgerow height in the area, is totally out of character and will therefore be visible from many viewpoints, and not hidden from view as suggested?

'in reaching a judgement, the Secretary of State should consider whether any adverse impact is temporary, and/or whether any adverse impact on the landscape will be capable of being reversed in a timescale that the Secretary of State considers reasonable'. The applicant states that the landscape and visual effects occurring in relation to the Proposed Development are temporary and reversible, with it having a defined operation life of 40 years (7.2.17).

Q7. I would question the definitions of "temporary" and "reversible"?

40 years is a very long time, during which any number of changes could happen, I don't have a crystal ball, so I certainly cannot predict the future and I am sure that stands for everyone in this room. As solar developments are a relatively new concept, particularly at such a large scale, no one can provide assurance of reversal "like-for-like" at the end point, as this has not yet been seen to be tested.

7.2.20. identifies that 'utility-scale solar farms have two main impact issues that determine distances to sensitive receptors: visual amenity and glint and glare. At yesterday's hearing we heard that the applicant is looking to alter the angle of the panels to satisfy the aviation concerns raised by Burn Gliding Club, in terms of glint and glare.

Q8. If there is to be such an amendment to that originally assessed, will this result in a full new glint and glare survey being conducted, as this change could have implications for other receptors, residential, road and rail?

Selby District Local Plan 2005 Policy ENV3 (referenced in 7.2.41) relates to the provision of outdoor lighting and states that developments will only be permitted where lighting schemes are designed to minimise glare and spillage.

The initial glint & glare study, undertaken by the applicant, reported within the text that 14 residential receptors fell within the no reflection zone, it failed to mention in the text that 136 did have potential to be affected by glare, this information could only be found in the mapping of receptor points. Similar was the case for road and rail receptors with the majority of points falling in the reflection zone, so I am sure you will understand my concerns.

Local Planning Policy Selby District Core Strategy Local Plan 2013 (referenced in 7.2.34) states: 'Proposals for all new development will be expected to contribute to enhancing community cohesion by achieving high quality design and have regard to the local character, identity and context of its surroundings including historic townscapes, settlement patterns and the open countryside.

Both residential and non-residential development should meet key requirements that include:
d) Make the best, most efficient use of land without compromising local distinctiveness, character and form.

The applicant may reject the word “development” as this is classed as “temporary” at 40+ years but the principles surely still stand.

Q9. I would like the applicant to explain to me how this development in any way contributes to enhancing of community cohesion, has regard for the local character, identity and context of the open countryside?

Q10. And how taking just under 100% BMV land out of food & feed production for the duration of the project can in any shape or form be the best and most efficient use of this land?

Selby District Local Plan Publication Versions (2024) Policy SG4 referenced in 7.2.53.– Development in the Countryside (Strategic Policy) includes that: ‘The Council will seek to ensure that the former Selby district area remains a special place to live by supporting development which protects and enhances the intrinsic character and beauty of the countryside, recognising the important role it plays in the local economy, for the health and well-being of local residents and as a biodiversity resource’.

It is not so long ago that we were all being encouraged to go outdoors once a day, during covid lockdowns, encouraged to take walks for our physical and mental well-being, and what better place to do this than in the peace and tranquillity of the open countryside. Local policy is to increase access to nature to improve public health. If this proposal is accepted we will be trading the countryside for industrialisation; tranquillity for constant noise and open views, for prison-like compounds.

Q11. How does this in any way promote the health and well-being of local residents?

Q12. Why do we have local plans and policies that are written with the specific localities at the forefront, if little heed is paid to them?

Cumulative impact

APP-035 6.1 Environmental Statement Chapter 15 – Cumulative Effects

Professor Mike Alder details that developing land use plans is the responsibility of Defra, that Government has a clear responsibility in putting in place a strong regulatory framework and that the Planning Inspectorate should then oversee the implementation of land use changes.

NYCC EIA Scoping response (4th July 2022) states that consideration should be given to cumulative landscape and visual effects in conjunction with other similar developments in the study area including those currently being considered or approved by planning authorities but not yet implemented and that the Cumulative Assessment should consider the number of large long-term schemes around Drax Power Station (the study area). There is a need to consider additional arrays assessed with other existing and/or approved projects. These have potential to affect views and the landscape character and setting and with operational effects over long periods of time. It is said that there is potential for ongoing erosion of the landscape baseline in this area over a number of years, therefore we would recommend that the landscape strategy should consider a landscape framework capable of offsetting the wider cumulative effects.

Q13. With this in mind why has the applicant scoped out the majority of projects known to be proposed or accepted in the area, even though the impacts on the local area and residents is likely to be immense, choosing only to scope in the 2 Lanpro solar farms?

Schedule 4 of the EIA Regulations states that it is important that the solar PV does not have a defining influence over the overall landscape character; that the development remains inscale with the landscape in which it is located and that views from nearby settlements are not compromised by solar PV in proximity where settlement could be seen to be enveloped by PV installations.

Q14. When the village of Camblesforth will find itself completely encircled by solar developments and glass panels will be all that can be seen for mile after mile in the local area, how can such a large scale proposal not be viewed as having a defining influence over the overall landscape character and how can views not be compromised when this is all we will see in every direction?

A concern was raised at the last hearings, regarding the fact that he importance of views from local roads should not be understated since these form the main access and entrance to the adjoining settlement and an important part of the immediate study area. The response was that the point was understood and the landscape strategy has evolved to include additional mitigation in relation to views from local roads.

I can only surmise that the additional mitigation will be more and perhaps taller screening, forming a tunnel like approach to the settlements.

Q15. Please correct me if I am wrong and share on what these mitigation measures are to be?

As residents we currently enjoy the open outlook of the arable countryside around us, stretching for miles, it is the character of the area and a big part of why we chose to live here. With deer fencing is proposed throughout the site and welded steel mesh fence proposed around the Substation and BESS Compound, the character of the area in which we live cannot fail to change. We are not talking about a single small parcel of land with perimeter fencing but instead an expansive area covering over 40 fields. From the freedom of open space, the word prison comes to mind and together with the cameras and PIR lighting over such an extensive area, this will only add to the oppressive nature of such a large development.

I firmly agree with the comment made during the last round of hearings that collectively this has potential to radically change land use within several km radius of the Grid connection point, for a long-period of time (40+ years) and that based on the assessment Magnitude criteria, this would be considered a ‘permanent’ and ‘large’ change.

Q16. I would be interested to hear the developers take on this, as it feels like the word “temporary” is very convenient to be able to push through an enormous project that will completely change our lives, and those of other local residents, as we know them, potentially for the remainder of many of our lives?

‘Not Significant’ seems to be banded about, in terms of effects related to the development of this large scale project.

Q17. Who determines these effects as “Not Significant”? Does the developer self-assess, marking their own homework so to speak?

I am sure, as a resident who is likely to feel these effects first hand I would be marking that homework very differently.

Q18. The developer talks of considerations being made in relation to residents and communities but if they are truly considering residents then why have they not spoken directly to the very people who are to be impacted upon, to hear their views and concerns, working with us rather than against us?

7.5.36. In relation to landscape character, the majority of the Site lies within the Camblesforth Farmlands LCA

7.5.49. States that a comparable major/moderate and significant effect would occur in relation to the Camblesforth Farmland, the LCA in which the majority of the Proposed Development will be located. The Proposed Development would occupy a large proportion of this LCA and would result in a large level of landscape change.

The applicant only considers the 2 Lanpro Solar farms alongside this project within scope for cumulative effect, if only considering these 3 solar farms we are still looking at a substantial cumulative impact and loss of BMV land, and this is without considering other proposed developments in the area:

Camblesforth Solar Farm	46% BMV
Carlton Solar Farm	57% BMV
Helios Solar Farm	97% BMV

Q19. With such a loss of prime agricultural land over a 40 year period, and possibly even longer, I would ask how such a project can even be given consideration?

Landscape, visual & BMV loss are not the only cumulative effects we can expect to experience both traffic and noise also require due consideration and yet the applicant only appears to consider roads within the actual proposed project area.

Q20. How can roads leading to this area be ignored in the equation, construction trucks related to the project have to travel on roads outside of the project to get to the site and so will be impacted on in much the same way?

The same approach appears to have been taken in relation to noise, with various other schemes in the local area having been scoped out in relation to cumulative effect due to their distance from the Proposed Development (at least 800m) or having incomparable noise impact profiles with the Proposed Development. I appreciate noise was discussed at yesterday's hearing but I feel all projects that could result in noise within the local area should be taken into account, as the overall impact could be great.

The Developer also appears overly focussed on the impact that Drax Power Station has, as a feature in the local area, than on the positive impact the expanse of countryside has on the local residents. Residents have either grown up with Drax Power Station on their doorstep and, as such, have become accustomed to it, or moved here of their free choice knowing the Power Station was there. Freedom of choice, in this way, is being taken out of our hands. Simply due to the close proximity to a National Grid Connection point residents and local communities are having one after another of these such developments forced upon them.

Q21. When will enough be enough? When will wellbeing be considered more important than a rush to meet targets and economic gain?

Comments made in relation to points stated by the applicant on the topic:

When it was raised that several other local projects had been scoped out and that the applicant had only chosen to scope in 2 projects, the applicant responded suggested that the date for other projects in the area to be considered as part of their cumulative impact assessment had gone, and that it was now down to other projects to include the Helios project within their cumulative impact assessments instead. I responded by saying: We are at the point of discussing cumulative effects within this process, so an arbitrary date, regarding submissions of other projects, seems less important than that of taking on a holistic view and the reality we are faced with. We live close to a grid connection point and a race by projects to connect to this. We could be facing any number of projects, we really don't know how many this will end up being. So, I do think we have to consider all projects that we have knowledge of, at this point in time, to gain a true picture of the cumulative effect..

Ecology and Biodiversity

APP-028 6.1 Environmental Statement Chapter 8 Biodiversity

The Overarching National Policy Statement ('NPS') for Energy (EN-1) 3 (8.2.3) requires developments to avoid significant harm to biodiversity and the NPS for Energy (EN-1) (paragraph 5.4.48) (8.2.4) states that: 'in taking decisions, the Secretary of State should ensure that appropriate weight is attached to biodiversity…interests within the wider environment'.

(8.2.10) The Selby District Core Strategy Local Plan (2013) includes Protecting & Enhancing the Environment and the Selby Biodiversity Action Plan lists 13 priority habitats and 12 species/species groups of material consideration within the Selby district. (8.2.12)

In a survey carried out by BSG Ecology in 2019 the following statement was made "Ground mounted PV panels have the potential to cause the highest impact on nature as they are installed on land which may have at least some value to wildlife."

Q22. How does the applicant plan to ensure that such habitats and species, as identified are not negatively impacted upon by the proposed development and will this be independently monitored?

Q23. If such impacts are identified will the developer be held to account to ensure remediation efforts are put in place?

(8.5.37) As the Proposed Development's solar PV panels are raised off the ground, and the perimeter security fence will retain suitable gaps/mammal gates at the base to allow free movement of priority mammal species, no habitat loss or severance effects will result for small to medium sized mammals.

Q24. What are the plans for larger mammals such as deer, as mentioned yesterday we have already seen a number of deer trapped by fencing at during the early stages of a solar development within the local community?

8.5.97 Details that some ground nesting birds of open landscapes, such as skylark, yellow wagtail and lapwing may be subject to displacement and that small numbers of waterbirds (most notably

lapwing) may be subject to minor levels of displacement from the Site or adjacent land. However, the developer suggests that availability of extensive similar arable habitats within the surrounding landscape is considered likely to mitigate such minor non-significant displacements. With more and developments popping up in the local area, in a race for connection to the national grid at Drax, more and more arable land is being lost for a significant period of time.

Q25. How can the developer, thereby suggest that there will be availability of extensive similar arable habitats within the surrounding landscape?

8.6.6 Given the nature of these developments (and the Proposed Development), the actual land take and associated habitat loss is a small percentage, with construction effects, largely temporary and reversible. Habitat losses comprise low ecological value agricultural land, and the solar developments provide clear commitments to achieve significant measurable biodiversity gains. Cumulatively, this represents a local gain in habitats of ecological importance, which will also cumulatively strengthen habitat connectivity in the wider landscape.

This is a huge area of "land take" over 1000 football pitches in size, offering a wide selection of habitats.

Q26. How does the developer calculate a small percentage of habitat loss, is there independent evidence to support this and is there an actual percentage figure of habitat loss predicted, as opposed to simply stating a small amount, as this term can be relative?

The 2021 Environment Bill mandates most new development will deliver an overall gain in biodiversity, Biodiversity Net Bain (BNG). This is an important aspect for all local planning authorities to consider in approving or rejecting planning proposals and, in particular, solar farms. The law does not apply to NSIPs (Nationally Significant Infrastructure Projects). Nevertheless, developers may wish to show their NSIP proposals do deliver BNG; Enso have subscribed to this approach.

Biodiversity is measured by Biometric 3 (JPO 39) Natural England 07.2021, however, some ecologists in the UK regard the metric as not fit for purpose. Prof. K. Willis a leading ecologist from Oxford University states that the BNG total "will promote further loss and fragmentation of some of the UK's natural environment and even more important the ecosystem services that flow…" and that "net biodiversity gain will end up being net biodiversity loss".

Dr C Betts, says the metric calculation only accounts for direct impacts on habitats within the footprint of a development or project. It is only a simple assessment tool and only considers direct impacts on biodiversity through impacts on habitats. Indirect impacts are not included in the metric. Biodiversity metrics are focused on typical habitats and widespread species; protected and locally important species' needs are not considered.

The comments by Willis & Betts are backed by a research paper (Sophus zu Ermogasson et al, June 2021). The paper notes that losses in habitat areas, as a result of development, will be traded for habitats of higher distinctiveness in the future. The paper states "Mandatory BNG will generally trade biodiversity losses today for uncertain future gains".

The Society of Conservation Biology (June 2021) research considered 55 BNG assessments and found that a promise of 25% increase in BNG delivered a 34% loss. Sophus zu Ermogasson concluded "that the safest mechanism for reducing the biodiversity impact of infrastructure is to avoid impacts to biodiversity initially. In practice this means redirecting development to previously degraded sites wherever possible".

The area proposed for the Helios project is made up of 96% BMV agricultural land, the remaining percentage is 3b graded. The area, by no means, could be classed as being a degraded site.

I may be wrong but a lot seems to rest, in terms of biodiversity net gain, on the introduction of species alien to the local environment such as sheep and meadow flowers.

Q27. Should there not be more weighting on the net biodiversity impacts, in terms of natural biodiversity?

Enso have said in APP-028 14.5.54. The land will be sown to grassland and managed, including by being grazed with sheep, for the duration of the operational phase. APP-028 14.5.74. …. their management will remain under the control of the current farmers. Whether they choose to manage the sheep themselves, or let others manage the sheep.

Q28. It does not appear that Enso intends to have much involvement with regards to the species intended to be introduced. 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?

Q29. Is there also a clear management plan going forward, as meadow flowers are unlikely to flourish without this, which in turn would impact on the biodiversity net gain calculations during the duration of the project?

Q30. What about the long-term impacts, or is this biodiversity net gain suggested even more temporary than the proposed development, will these impacts simply reverse in the long term, if so what was the actual gain and at what cost in terms of losses?

The applicant added at the end of the hearing that schedules are very tight and that timeframes given for them to respond do not do justice to the subjects under discussion.

I responded to this point explaining that it is not just Enso that have been governed by time constraints and ability to do justice to the subject area under discussion. Parish Councils received letters on a Friday, in relation to Common Ground Statements, and were expected to respond by the Monday. This when it is common knowledge that most Parish Councils only meet once a month.

The NSIP Examiner acknowledged this concern, explaining that he was aware of this issue.

A discussion then ensued in relation to the height of the panels, that being 3m. Enso suggested that if the local community want to know what the panels are like, there are developments happening in the local area and that the Camela Lane development would be ready sooner, so residents would be able to see the panels themselves first hand.

I responded to this comment to add a little clarity on what may be a misconception: I explained that the panels associated with the Camela Lane project are static low ground mounted panels, much smaller in height than the tracking panels that Enso are proposing for the Helios project, which are some of the highest at 3m high.
