NSIP Helios Solar Farm & Battery Storage Proposal

Open Floor Hearing – Monday 10th March 2025

Lesley Marson speaking today as a resident living in very close proximity of the proposed development, and as a HALT campaign group member.

I would like to focus today on some of the questions, that I raised previously, that remain unanswered.

Starting with the **impermeable geomembrane liners** proposed for the BESS compound, which sits within a Groundwater Source Protection Zone 3. The Environmental Agency LFES Report (GEHO0409BPNH-E-E) states that geomembranes are subject to physical stresses during transportation, site handling, installation and during their life.

Q1. Is there quantitative evidence to establish that the geomembranes will hold up to the stresses placed upon them?

No infiltration testing was conducted within this area, as it was stated that there is no pollution risk due to the geomembrane use. When this area is to house around 76 BESS, with potential for chemical leakage and associated with fire risk, that could result in emission of pollutants, would it not make sense to conduct infiltration testing, in terms of the environmental protection and the health & safety of residents?

The effects of chemical stress, it is stated may take decades to appear.

Q2. Will the 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 geomembranes due to the susceptibility to biodegradation. Attacks by rodents on the liner systems can't be ruled out, according to the Environment Agency. Burrowing activities can also damage the subgrade or protective layers of the geomembranes.

Q3. Has this been taken into account considering the vast rabbit, mole & rodent population in the area?

Moving onto **Screening**, there are concerns that the proposed screening is not fit for purpose. This is not a small parcel of land to be hidden from view. The area is huge, stretching for miles. The mapping of the screening shows that some properties have no screening at all to block their view of the expanse of glass.

Rabbits are rampant in the area, burrowing and stripping trees and vegetation.

Q4. It is all very well planting immature screening but how will this be managed to ensure that it is not stripped in the early stages, preventing growth through to maturity?

Q5. Will replanting take place if this happens & how will this be monitored and managed?

Q6. And why should residents have to wait 15 years for possibly sufficient screening?

Mature plants could be used from the outset.

Q7. If the applicant has consideration of community concerns, would this not be actioned without question, instead of opting for the cheapest option?

One aspect, conspicuous by its absence at this round of Issue Specific Hearings, is **BMV Land Use.**

HALT, stands for Helios Agricultural Land Threat.

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. The BMV Proportion Land Estimate

shown in Table 14.8 (APP-034 Soils & Agricultural Land) details the % of BMV land in England to be 41.3%, in North Yorkshire Council area to be 29.8% and in the Selby area to be 76.7%.

With this in mind, and the government policy to avoid BMV land in favour of lower grade agricultural land

Q8. Should the applicant not to looking at other more suited grid connection points, areas that do not host such fertile food producing soils or alternatives to ground mounted solar panels?

The applicant acknowledges, in APP-034 Chapter 14 Soils & Agricultural Land, that they 'should seek to minimise impacts on BMV agricultural land (Grades 1, 2 and 3a) and preferably use poorer quality land (grades 3b, 4 and 5).' And that 'where possible, they should utilise suitable previously developed land, brownfield land, contaminated land and industrial land.'

The applicant has reduced the overall initially proposed development area, but this was not done with the view of favouring lower grade land, in fact it increased the BMV land to be used for the project from 94% to 96% BMV and no lower Grade 4 or 5 land was identified within the project area.

Mike Alder professor in Rural Environment at the University of Essex, Fellow of the Royal Agricultural Society reported (3rd March 2025 – The Green Chronicle) that UK Policy will lead to food insecurity, stating that land area is finite and land use is changing at a rapid rate. He reported that Natural England suggested that food production could decline by 25% if measures to meet the most ambitious targets are enacted. Solar farms, it was stated, currently account for 30,000 hectares and to hit net zero targets will require at least 84,000 hectares if this increase is land based. This means that in the next few years 8% of the crop-able area of the UK could be lost. In addition housing targets could lead to a further loss of 48,000 hectares.

The UK produces 60% of the food it consumes, with food exports included this falls to 54%. To maintain this level of sufficiency will require more production on less land; unlikely since crop yields have been reasonably consistent over the last twenty years.

The UK population is 68 million and is set to increase to around 74 million by 2026 according to this report. Less land in production and more mouths to feed means more food importation. If changes are not made then current policies will lead to food insecurity. In the short term this will be seen by food price inflation and food poverty and in the medium to long term by food shortages.

In February of this year the Energy Secretary, Ed Milliband, responded to a letter from the MP, Richard Fuller, who had sought clarification on whether BMV agricultural land remains a criterion in solar project assessments, and if its weighting in approval decisions has changed.

Ed Milliband's response (17th February 2025) was that there has been no change to the policy on the weighting attached to the use of BMV land. That planning policy and guidance makes clear that, wherever possible, developers should utilize brownfield, industrial, contaminated, or previously developed land. Where the development of agricultural land is shown to be necessary, lower-quality land should be preferred to higher-quality land (including "Best and Most Versatile" land). This he said was the policy of the last government and that there are no plans to change this policy.

If this application were to be approved, this would be sending out the complete opposite message, it would go against current policy, as stated by Mr Milliband, and could open the floodgates to other proposals on our prime food producing land across the country, thereby potentially putting our food security as a nation at risk.

Q9. I would therefore ask that due consideration be given to the Energy Secretary's very recent statement in considering this proposal?

There are many other areas that I would like to speak on but I appreciate that time is limited and that some areas are to be discussed at the Issue Specific Hearings.

So, I will stop there and thank you for allowing me the opportunity to speak.