

From: [REDACTED]
To: Helios Renewable Energy
Subject: Interested Party Reference number: [REDACTED]
Date: 30 October 2025 15:59:40

Dear Mr Million,

Thank you for the opportunity to add further comment to the Helios Project at this late stage.

Please find below my responses to parts of the Applicants document, *The Applicants Response to the Secretary of States Response for Information: Planning Inspectorate Reference: EN010140 October 2025* which includes my questions at Deadline 9 (which the Applicant again, has failed to answer satisfactorily).

2.0 GREENHOUSE GAS EMISSIONS

Even at this late stage, the Applicant still fails to provide the number, composition and source of the proposed solar panels and BESSs.

Consequently, how can the Applicant provide details of greenhouse gas emissions when the details of what is to be constructed are absent?

All we have are vague assurances, and certainly no guarantees, that when what they present as “best assumptions of this scale” will become reality and at what stage will this become apparent? Addressing issues post approval would be significantly more difficult and who/what body(with the appropriate technical competencies) would ensure compliance?

The Applicant insists that technology keeps changing, which is their reason for not providing such detail, but how therefore can their assumptions be accurate when subject to possible changes?

One example may be the safe disposal of BESSs.

In a recent article by Dr Lars Schernikau “PROs and CONs OF UTILITY SCALE BATTERY STORAGE” <https://unpopular-truth.com/wp-content/uploads/2025/08/2025-07-Utility-Scale-Batteries-Lars-Schernikau-EN-1.pdf>, he identified that the recycling of low value LFP batteries without cobalt or nickel, now commonly used in BESSs, is uneconomical, and we can expect illegal “exports” and dumping. As we are yet to know the number and composition of the BESSs proposed, how do we know that their disposal proposals are acceptable?

How can a planning application of this magnitude be approved solely in principle?

3.0 ALTERNATIVES & SITE SELECTION – 5 kms Radius and Use of BMV Land

In the Applicants summary, 3.2.40, they state that the search area “is appropriate based on environmental, technical and viability constraints and that suitable sufficient land ‘became available’ so no need to extend the search”.

I totally dispute this assertion, especially the Applicants use of “suitable”.

It is clearly apparent that the Applicants SOLE criteria is to achieve the most cost effective and commercially beneficial option to maximise profits for its investors.

This can be evidenced in Section 3.2.4. and ISH1 4a iv) (Limitations Related to Grid Connection).

Their ONLY justification (or defence) in choosing Drax and self-imposing a 5kms search radius is:

- cost of installation
- close proximity to the grid connection at Drax
- convenience.

NB In section 3.2.1, the Applicant accepts that no Government guidance on search areas exists, stating that each application “should be considered on its own facts”, yet in section 3.2.9, appears to justify the 5kms radius by citing other consented solar DCO schemes that have used similar search areas, as if a precedent has been set!

The facts relating to these other schemes may be significantly different and to make such an assertion is unjustified, unhelpful and misleading. It is also interesting to note that the search area had to be extended in many, if not all, of these other schemes.

Having reached this commercial decision, the Applicant then proceeds to justify its case by highlighting and then summarily dismissing or underplaying the key constraints that pose a serious risk to the suitability of the site:

a) Use of BMV land

NPS En-1 advises that the use of BMV agricultural land should be minimized, with a preference for the use of poorer land.

The Applicant appears to take the opposite approach.

The FACT that 96% of the land in the self-imposed radius is Grade 1 and 2a (i.e. the most fertile and productive agricultural land) appears to be nothing more than an inconvenience and considered an unfortunate loss in this profitable drive to a net zero target.

In this current climate of global food supply instability, where food security is of paramount importance (a point reiterated by the Prime Minister himself at a recent PMQ’s), it is imperative that the designated protection of BMV land in the UK planning system is honoured, especially when it appears that 60% of land **already** approved for large site solar arrays is on BMV land (Countryside Charity, CPRE October 2025).

The approval of a large project on such a high percentage of BMV land flies in the face of Government

policy, especially when considering the long term impact over its 40 year lifetime.

It should also be noted that the majority of this land is crop growing and not used for animal grazing. Hence this picture of perfect harmony between productive farm use and renewable infrastructure is pure fantasy.

b) Brownfield sites – the Applicant identified that there are insufficient brownfield sites within their self-imposed 5 kms radius, which should have prompted an extension of the search area at the very least or more logically have led to the conclusion that the site is not suitable for a project of this magnitude.

c) Flood Risk – the land sits on Flood Zones 2 and 3a, medium to high risk. Building solar arrays and BESSs on land that is prone to flooding defies logic. It also presents a tremendous threat to the surrounding areas that will suffer from the inevitable run off from the heavily compacted soil and present a potential contamination risk to surrounding water courses.

d) Cumulative Impact – barely raised as an issue, the Applicant completely dismisses the cumulative impact this development will have on the area.

This project is FOURTEEN TIMES the size of Camblesforth village and that's WITHOUT taking into account the

dizzying array of additional energy generating/storage infrastructures, either approved, awaiting planning permission or in the pipeline.

Two solar farms are already under construction to the north and south of Camblesforth village. A 400 MW solar array has recently been approved for BOOM Power across the River Ouse and in January 2025 the Secretary of State, Mr Miliband approved Drax Powers bioenergy with carbon recapture and storage application.

With regard to BESSs, two have already been approved at Hales lane (100MW) and New Road Drax (100MW), two await decisions by North Yorkshire Council at nearby Barlow (80MW) and Cliffe (40MW), each of the two solar farms currently being erected on either side of the village has a 10 MW BESS. More recently, two more applications have been submitted for BESSs on the edge of the village; Root Power (99MW) recently approved and Brockwell Energy (100MW) that is currently awaiting a decision.

The national policy statement for renewable energy infrastructure (EN-3) explicitly recognises the risk of clustering around available grid connections and warns planners to be aware of the “cumulative impacts of siting a solar farm in proximity to other energy generating stations and infrastructure”.

In a written parliamentary statement in May 2024, Claire Coutinho, the then Secretary of State for energy security and net zero, said:

“When considering whether planning consent should be granted for solar development it is important to consider not just the impacts of individual proposals, but also whether there are cumulative impacts where several proposals come forward in the same locality”.

If this project comes to fruition, then local residents, already swamped with the huge proliferation of energy infrastructure in this area, would be subjected to an additional industrial scale development on their doorstep (almost surrounding the village), and the accompanying environmental, physical, emotional and economic hardship, which appears to be of no consequence nor importance to the Applicant. Throughout the process, the Applicant has, at best, ignored residents' input and, at worst, treated them with utter disdain.

The Applicant has also provided NO evidence that they considered other sites outside the proximity of our villages, prior to choosing Drax.

Drax is not the only grid connection and having identified the serious constraints associated with this area, it should have been deemed unsuitable and other, more appropriate and suitable locations explored.

Conclusion

When the only clear justification for such a massive project is its commercial viability, this should not override and outweigh government policy, the impact on food security and the devastating impact on the mental, physical, emotional and economic wellbeing of those people directly affected, not to mention the inconvenience they will suffer throughout the construction phases, let alone when the first BESS fire occurs.

12. COMMENTS ON DEADLINE 9 AND 10 SUBMISSIONS

12.1.1 re REP9-17

Background and Response to the Applicants Response to Still Unanswered Questions

The construction and siting of BESSs as part of this massive development is of major concern for residents, especially in view of:

- the growing awareness of the risk of fire/explosion
- the lack of specific regulations governing their construction, operation, maintenance and disposal
- the absence of any respected safety regulatory body, such as the Fire and Rescue Services and the Health & Safety Executive (HSE), involved as statutory consultees in the planning process.

There are also major concerns regarding the noise levels emanating from BESSs and the associated infrastructure (alongside the noise levels from the surrounding solar panel machinery), especially from residents on Hardenshaw Lane and Chestnut Court, on the edge of Camblesforth village, who are extremely close to the proposed site.

Our fears have intensified over the year as the Applicant has systematically failed to engage North Yorkshire Fire and Rescue Services (NYFRS), early and “continuing throughout the planning process”, as

recommended in the National Fire Chiefs Council (NFCC) guidelines. Also, the Common Ground Statement (November 2024) appeared to show that nothing had been accepted as agreed and the Applicant has still failed to provide full details of detection, monitoring and suppression systems, which is most critical. I therefore raised a number of issues at Deadline 9:

Reaction to the Applicants Response to the Issues Raised

1. (a) Re Battery Safety Concerns

1 (a) The Applicant refers to the BESS Safety Management Plan [APP-119] which was produced in April 2024 by Abbott Risk Consultancy. This is a document based on scenarios as opposed to substance and covers each area in very general terms. It is an outline document and fails to provide any detail from which we could gain some reassurance as to how BESSs will be constructed, operated, managed and disposed of.

It also appears not to have been updated since April 2024, during which time technology, guidelines and regulations may have changed.

Additionally, the Applicant states that “consultation and communication has also been undertaken with NYFRS which has informed the outline BESS Safety Management Plan”.

It should be noted that the “consultation and communication” with the NYFRS amounted to a phone call made to them at a very early stage with minimal input as confirmed by the Applicant at the ISH2 (2.2.19)

“the NYFRS had not engaged with the outline BFSMP save for directing the Applicant to the NFCC guidance and grid scale practice guidance”.

We understand that no further communication has taken place since this time.

It also speaks volumes that NYFRS has yet to respond to the request for comment, which may demonstrate how ‘out of the loop’ the service must be feeling!

If the Applicant has failed to adhere to the basic NFCC guideline to “engage early and throughout the planning process”, it provides NO reassurance that the Applicant will adhere to these and other safety guidelines especially as they are, surprisingly, still non-statutory and therefore not legally enforceable.

1. (b) Clarification of the Number and Type of BESSs

1.(b) The Applicants response, yet again, is that “the exact numbers of BESS units cannot be confirmed at this stage as technology may improve, changing requirements in terms of unit numbers and size”.

This is totally unacceptable.

At an initial meeting, the Applicant stated there would be 50 containers. For this to change to 100 at the next public meeting appears to be nothing short of “mission creep”. Although we have subsequently been told ‘76’, this number is yet to be confirmed.

It is particularly frightening that this project, with potentially 76 containers, would bring a total of NINE BESS installations and a total capacity of approximately 800MW, to this tiny area!

As leading experts report, the more lithium ion, the greater the risk of fire and the greater the risk to the health and safety of local residents.

Without this information **prior** to approval:

1. How can we be sure the Applicant will meet the non-statutory guidelines (NFCC/ UL9540A/NFPA 855). For example would the recommended separation distance standards between BESSs be met?

- a. The UK Health Security Agency (UKHSA) has recently raised its concerns in relation to a proposed battery energy storage system (BESS) site at Navenby in Lincolnshire. Its response to the planning application highlighted the lack of compliance with NFCC guidelines, as a result of which it “significantly increases” the risk of a fire at the site developing into a major incident. It specifically relates to the failure to follow the recommended 6m separation distances between the containers which it believes will increase the risk of thermal runaway. https://www.thefpa.co.uk/news/fire-safety-concerns-raised-over-proposed-bess-site/?fbclid=IwZXh0bgNhZW0CMTEAAR71cmZ0GLS45Sz-B8WriWgJ8gEk7wxCqybHfpaH1SE_HsJFuJAd3eFTOWkWPg_aem_9i2Zto9H2TYdo8E5IDYC2w

- b. In their BESS Safety Management Plan, Abbott Consultancy refer to a 5m separation distance which falls short of the guidance and, if even more BESSs are proposed, these distances will reduce even further, greatly increasing the risk of a major incident.

2. If the Applicant fails to follow the above guidelines, would they ensure that the appropriate tests are carried out to ensure that fire will not propagate to a neighbouring container as recommended in the NFPA 855 9.1.5.1 – 9.1.5.4?
3. How can anticipated noise levels be assessed with any degree of accuracy? Surely it would be too late once construction is underway?
4. The Applicant suggests that the BESSs and solar panels will be sourced from China. Isn't it a fact that China is the largest carbon emitter (34%) and is creating a coal empire, currently having 3,300 coal plants and two plants are built each week to cope with demand. The renewables are also transported on diesel guzzling ships. Is this exported carbon footprint been taken into account in the Applicants greenhouse gas emission analysis? Also how will we know if they are from an area where slave labour is used in the process of sourcing raw materials and their manufacture, which is against Government policy?
5. With no serious engagement with NYFRS, how can we be sure that the service itself has the

competence, capacity and skills to manage effectively when a fire/explosion inevitably occurs and especially if the Applicant chooses to ignore parts of the NFCC guidelines?

May I also respectfully ask if approval is given without such detail in place, which body will monitor and ensure compliance as to the construction, operation, maintenance and disposal so that local residents are safe?

- o The Council does not have the technical capacity or competence,
- o The Health and Safety Executive is shying away from any responsibility as it, amazingly, doesn't recognise lithium ion batteries as a hazardous substance (so it fails to come under the remit of COMAH or themselves)
- o The Fire and Rescue Service has no statutory powers and even if it did, the NFCC guidelines do not relate to the health and safety of people living in the vicinity of a BESS fire and affected by toxic smoke and neither do the Fire and Rescue responsibilities

1.(c) Whether the testing of containers would be carried out in line with the more informed recommendations of newly developing regulations i.e. Regulatory bodies in the EU, U.S., and China are increasingly recommending or mandating full-scale burn verification for battery systems, making burn test a key certification criterion.

<https://www.pv-magazine.com/press-releases/fire-tested-sungrow-reinforces-bess-safety-with-large-scale-burn-simulation/>

1(c) The Applicant failed to respond to this question.

2. I challenged the Applicants claim that the 190MW solar array will power 47,500 homes, instead providing only 0.05% of the annual electricity requirement.

2. The Applicant failed to respond to this claim.

Conclusion

I find it totally unacceptable that the Applicant has chosen to ignore or dismiss the concerns that I have raised and sadly, this has been the consistent attitude to all residents input throughout the process.

There are eye watering amounts of money to be made from operating renewable infrastructure of this nature as evidenced in a recent Financial Times article.

[https://www.cornwall-insight.com/press-and-media/press-release/battery-asset-revenues-forecast-to-rebound-in-](https://www.cornwall-insight.com/press-and-media/press-release/battery-asset-revenues-forecast-to-rebound-in-2026/#:~:text=Cornwall%20Insight%27s%20forecast%20shows%2C%20annual%20revenues%20for%202-hour,be%20observed%20in%20our%20forecasts%20for%20other%20durations).)

[2026/#:~:text=Cornwall%20Insight%27s%20forecast%20shows%2C%20annual%20revenues%20for%202-hour,be%20observed%20in%20our%20forecasts%20for%20other%20durations\).](https://www.cornwall-insight.com/press-and-media/press-release/battery-asset-revenues-forecast-to-rebound-in-2026/#:~:text=Cornwall%20Insight%27s%20forecast%20shows%2C%20annual%20revenues%20for%202-hour,be%20observed%20in%20our%20forecasts%20for%20other%20durations).)

With such a financial incentive it may be argued that the developers will do and say anything to secure approval, but without specific details as requested, there is no certainty that such assurances and promises they present would come to fruition particularly as many of the safety guidelines are not legally enforceable. This presents an extremely worrying scenario.

Pam Spreckley

Sent from my iPad