

## Summary of ISH2

I remarked that whatever way I will leave my home in North Clifton I will encounter solar infrastructure in my view.

I said that the image we were shown of a solar panel behind a wire fence was misleading regarding perspective. For further clarity the photo served no purpose at all ref what it was meant to. The 4mtr fence was chopped off at the top and there was no point of ref for the heights involved. It did however raise concerns about the level of management of planting for all the habitat schemes if hedges are meant to grow for 15yrs behind a 4mtr solid fence.

I referred to my submission for D1 about a report commissioned by the Welsh Government in respect of soil health and reversibility at decommissioning.

I asked for clarification of the phrase 'wider sustainable development objectives'.

## Comments for Deadline 3

Response to Sequential and Exception Test EN010159/APP/9.15

1.1.5

In what way, given that the site contains substantial amounts of BMV, similarly for flood zone 2 and 3, is in a Water Protected Area, with the risk of reservoir failure, did it 'perform well'?

2.1.7 and 2.1.17

NPS 5.8.7 and 5.8.36. Given the predicted increases of 2.4mm and 4.1mm due to submerged infrastructure, how is that not increasing flood risk on site and elsewhere?

2.1.19

If the flood risk could have been mitigated to a safe, acceptable level then surely it should have been. If the SoS is satisfied the 'risk can be mitigated to a safe and acceptable level' why hasn't it been. Can indicates the ability/ capacity to do something....it's a verb. So the risk should be wholly mitigated. Does can have another meaning here?

2.1.22

The idea of run off from panels having the same impact as rain falling from the sky to the ground is contradicted elsewhere.

Relevant Considerations from Recent Solar Developments.

Cleve Hill – 360ha, they improved the flood protection by additional bunds and transformers were put on a platform that rose and fell with water levels.

Heckington Fen - 524ha, 15km search radius, with no major river susceptible to flooding within the site.

Cottam - 1270-ha, 20km search radius across 4 sites with the majority in flood zone 1.

West Burton - Predominantly flood zone 1, 886ha, with 98.81 of the flood zone 3 being for habitat management.

Old Malton - 52.8ha, majority flood zone 1. No piling. Frames 1 mtr deep. At scoping stage an area of 160ha was put forward. The land was later revised to 85 ha with a proposal to develop 65ha. The reduction was due to the use of more efficient panels. The final site of 52.8 was due to the desire to use as little BMV as possible. The capacity of 30.4MW went below NSIPS jurisdiction.

Land at Ham Road – was for housing not electricity generating and the applicant had made the entire site safe from flooding (tidal) by land changing measures. The inspector's remark was "failure to undertake a sequential test for tidal flooding" not flooding alone. There would be "substantive risks and harm" if all parts of a solar farm were flooded. Could the applicant make the entire site safe and not take the sequential test?

R (Mead and Redrow) v SoS LUHC 2024 EWHC – This is in relation to the Town and Country Act 1990 again for residential units. It revolved round the judgement of what was considered the appropriateness of multiple sites being available and the 'need' being taken into consideration. Is the applicant alluding to the possibility that there are multiple sites available for their project which they do not consider appropriate but 'need' should override everything?

### 3.8.6

The fact that the above were consented to does not justify the statement that they are 'capable of operating safely without increasing the flood risk elsewhere' since they are very recent and there has not been sufficient time and experience to warrant that remark. Time will tell.

### Site Selection Criteria

#### 4.2.1

The available connection is not yet even at planning stage.

It would be sited on large amounts of BMV land, the same for flood zone 2 and 3, in a Water Protected Area with a reservoir metres away.

#### 5.2.2

Size of the site is driven by a not yet available grid connection

#### 6.1.3

As a balance to that there will be loss of BMV land and food production, increased flood risk, loss of agricultural jobs, (immediate and all trades associated with agriculture), loss of amenity landscape, cost to the NHS due to anxiety, the list could go further.

#### 6.1.4

Mitigation measures are no guarantee.

#### 7.1.1

Given the responses at the ISH2 regarding the agreement or not on flood risk, the conclusion of having passed the tests would appear debatable

### Applicant Response to ExA Questions

#### 12.0.9

It is adequately disputed elsewhere that rain hitting panels before reaching the ground can have a different impact from rain falling naturally to the ground. There is mention of cumulative effects of the whole project with other solar farms along the Trent Valley. What about the synergistic response possibility too?

Establishing suitable groundcover will be challenging, waterlogged for days or longer, or times of drought. Rainfall is expected to increase, in intensity and duration, irrespective of the appearance of a solar farm but a solar farm of this scale is an unrehearsed additional complication, in an already very precarious flood risk situation.

### 13.0.1

The original size put to the community was 3500 acres. It went to 4000 at the next meeting. So the removal of 245 acres still left the site larger than originally stated and perhaps left them with an opportunity to release more BMV land?

As a resident of North Clifton I have witnessed visibly and audibly, from my home, the power of the River Trent in flood. I do not agree with the conclusion that a solar farm of this size would not increase flood risk onsite or elsewhere. The flood defences were built in the 1950's with no anticipation of having any structures built close by, let alone the scale of structures proposed. Their integrity could be compromised over the 60yr period. The applicant although content to be benefitting from their existence has made no mention of contributing to their upkeep or improvement. As riparian owner, if the proposal is accepted, would they have responsibility for upkeep of the river banks?

In all the discussions around this project the aim has been to keep the site safe. There has been talk of the benefits of the proposal but what of the downsides, most tangible of all, flooding? Where has the reality of a flood been discussed. There will be provision for maintenance plans and clean ups. That is like shutting the stable door after the horse has bolted. I question the flood return data given the events of the last 25 yrs and the met office predicting extremes will become the normal. Even the applicant questioned the EA as to what the anticipated return might be for the Jan 2024 flood. (in the virtual meeting with the EA in Feb 2024) The EA said they would 'look into this and provide us a response'. Did they do that?

Where is the experience and data for such a large solar farm on a large area of flood zone 3 next to a major river known to flood? Authorities have admitted they do not have the resources or expertise to deal with such as this. Naively, I thought the authorities would

know where the flood water would extend to in the floods of 2000 and 2024. How wrong was I!

The applicant initially gave an indication of <1mm increase in flood levels due to loss of floodplain storage. It has subsequently been given as 2.3mm on the west and 4.1mm on the east. That level could increase again when the final decision on panel size etc is taken and no agreement on tolerance level, if relevant, has been agreed with the EA.

I have been trying to have the question of floodplain delineation answered for weeks now. I understand that a tidal river has different regulations. I have been passed from authority to authority. The functional floodplain can alter with time and with climate change and more frequent and severe inundations, some areas previously not considered functional floodplains will have to be included. Panels will already be submerged to a depth of 300 to 600mms in parts even though they are on stilts. It surely speaks volumes as to the unsuitability of the site. The EA as of March 2025 aims to refresh their flood risk data every 3 months. What happens to all the calculations re flood risk if this season the water level exceeds all expectations? At what point for physical or financial reasons would the proposal have to be looked at again?

I have asked the applicant if there has been land secured /set aside for future flood risk management. Their reply was 'the applicant has not been made aware of any present or future flood risk management measures that are to be implemented within the order limits'. Is the EA or whoever is responsible for this able confirm that please and whether or not due to the 60 yr time frame combined with climate change there should be some land secured for this purpose?'

Please could the applicant justify again taking the order limits to the south side of Trent Lane in North Clifton instead of the north and encompassing the small area at the end. Prior to realising the applicant had claimed this too, it was an area that still felt familiar and safe. Claiming this area has intensified the feelings of the deleterious effects this proposal will have on village life and alienation from an environment known for decades.

