

LAND NORTH OF BUTTERFLY LANE, LAND SURROUNDING HILFIELD
FARM AND LAND WEST OF HILFIELD LANE, NEAR ALDENHAM,
HERTFORDSHIRE

CLOSING SUBMISSIONS ON BEHALF OF
THE COMBINED OBJECTORS GROUP (“COG”)

APPENDIX 1

Table of Contents

1.	<i>CD-ADAP8 – Land N of Halloughton, Notts</i>	<i>3</i>
2.	<i>CD-ADAP9 – Cleve Hill.....</i>	<i>3</i>
3.	<i>CD-ADAP13 – Land W of Wolverhampton WP substation [PB / REB APP 6].....</i>	<i>4</i>
4.	<i>CD-ADAP14 – Land S of Monk Fryston, Selby [PB / REB APP 5].....</i>	<i>4</i>
5.	<i>CD-ADAP15 – Cranham Golf Course, Upminster [PB / REB APP 2]</i>	<i>5</i>
6.	<i>CD-ADAP16 – Rowles Farm, Bletchington, Ox. [PB / REB APP 1]</i>	<i>5</i>

Summary Points on Appellant's decision letters

1. CD-ADAP8 – Land N of Halloughton, Notts

- 2022
- Inspector decision (SRG Baird)
- 49.9 MW
- **Not in the green belt**
- Low levels of LTSH to HAs
- Significant weight to renewable energy benefits DL 55
- Significant weight to BNG of at least 73% in habitat units DL 59
- Recognition of significant length of 40 year development period DL 73
- Permission granted

2. CD-ADAP9 – Cleve Hill

- 2020
- NSIP – 250 MW (including energy storage facility of over 50MW) (176 hectares to be occupied by solar panels)
- DL/1/1.3 - Energy storage facility actually appears to be c. **350MW**
- Also makes provision for its own substation.
- **Not Green belt**. Sited on a flat and featureless coastal plain: DL 4.10
- DL/5/4.12 – “*would affect only small number of receptors*” – remarkable for site this size
- Issues around SPA/Ramsar and impact on species, overall neutral as effects would be adequately mitigated
- Substantial weight to renewable energy generation
- Significant additional weight to battery storage system

3. CD-ADAP13 – Land W of Wolverhampton WP substation [PB / REB APP 6]

- 2022
- Written reps
- Ins decision: Tamsin Law
- Battery storage facility (50 MW, 28 battery units, land forms ‘part of an equestrian paddock)
- Not solar farm
- [OR recommended approval]
- **DL/7: Single field, only 0.84 ha – see D&AS below**
- D&AS/5/2.1: Application site 70m N-S x 120m E-W = 8,400 [0.84 ha]
- Green belt, substantial weight
- DL/9 – Encroachment (but NB above – less than 1 ha)
- Substantial weight to energy storage benefit – support gained from NPS EN-1 and Energy White Paper
- Reversible nature relied on
- VSC accepted – permission granted

4. CD-ADAP14 – Land S of Monk Fryston, Selby [PB / REB APP 5]

- 2022
- Battery storage facility (26 shipping containers, 0.48 ha)
- Not solar farm
- Ins decision: Paul Cooper
- **DL/4: Size – only 0.48 ha, part of one field!**
- **DL/18: Substation dominating factor in locality and wider l/scape**
- Green belt, substantial weight
- Harm to character and appearance
- DL/24: Needs to be close to substation, ASA acceptable, Ins satisfied it needs to be in GB, by exhaustive material: DL/27.
- Significant weight to diverse energy strategy
- Permission granted

5. CD-ADAP15 – Cranham Golf Course, Upminster [PB / REB APP 2]

- 2015
- Ins decision: Jessica Graham
- 2.642 MW
- DL/5: 5.5 ha site
- DL/5: Adjoining M25 and Golf Course, and between them: DL/14
- **DL/7: Single field**
- DL/12: Urban fringe location
- **DL/13: M25 dominant feature of l/scape**
- Green belt, substantial weight (notes thickening of hedgerows and boundaries for screening compound loss of openness: DL 8)
- DL/9: Encroachment
- DL/20: Only very limited glimpses available, not materially affecting use of PROW nearby
- **DL/29: No heritage impacts**
- DL/30: Not used for agriculture, and unlikely to be so
- Limited localised effect on character and appearance (noting location next to motorway and golf course – alteration not so marked as if surrounded by open farmland), but taking into account beneficial elements, overall an enhancement to character and appearance – **so GB the only harm (DL 31)**
- Considerable weight to biodiversity improvement, substantial weight to renewable energy.
- Permission granted

6. CD-ADAP16 – Rowles Farm, Bletchington, Ox. [PB / REB APP 1]

- 2014
- Ins decision: Paul Griffiths
- 10 MW
- Green belt, substantial weight
- No purposes harm
- **DL/8: FP “little used” so close up views not often experienced**

- DL/9-10: Very limited landscape harm, temporary nature taken into account
DL 9-10
- **DL/11: No heritage harm**
- Benefits of a ‘significant scale’ in terms of renewable energy, also assisting viability of a rural business – considerable benefits sufficient to clearly outweigh harm
- Permission granted

WAYNE BEGLAN

CORNERSTONE BARRISTERS

4 NOVEMBER 2022