

ROBERTSON WADE

APPLICATION BY RWE RENEWABLES UK SOLAR AND STORAGE LIMITED FOR AN ORDER
GRANTING DEVELOPMENT CONSENT FOR THE PEARTREE HILL SOLAR FARM ORDER 202[]
PLANNING INSPECTORATE REFERENCE NUMBER: EN010157

REGISTRATION IDENTIFICATION NUMBER: FF434A0A7

COMMENTS ON APPLICANT'S RESPONSE TO WRITTEN QUESTIONS

1.1.6: The Applicant appears confident that there is no issue in connecting to the Creyke Beck Sub Station but this does not seem borne out in practice. In its Planning application for Wanlass Beck Substation the NGET clearly state that "the existing Creyke Beck 400kV substation does not have sufficient capacity to accommodate new customers requiring a connection to the electricity network. National Grid Electricity Transmission (NGET) has therefore identified the need for additional substation infrastructure at the Creyke Beck 400kV substation to facilitate customer connections."

In its Summary of Written Representations, NGET agrees it own assets that are an essential part of the electricity transmission network. There is, NGET suggest, "significant infrastructure being delivered within the same area and potentially within similar timescales. As such, there needs to be careful co-ordination and consultation undertaken between NGET and the Peartree Project to ensure that each project can be delivered without unduly interfering with other connectee projects. This is provided for in the form of protective provisions that NGET is seeking to include in the Order (NGET Protective Provisions)." The NGET claims that such Protective Provisions have yet to be agreed.

The East Riding of Yorkshire Council has at Para. 5 of its submission sets out a list of connectee projects likely to use Creyke Beck Sub station which only confirms there must remain an unresolved doubt about capacity. This excludes the possibility that Orsted may revive Hornsea 4.

A decision is premature until these issues are resolved.

1.1.7. If the earliest date for connection to the grid is 2033 and the latest is 2035 then this seems to reinforce that there is insufficient grid access at Creyke Beck now, or in future, if other connectee projects are developed first. I accept that the EA cannot give weight to future events or changes in Policy but the Project still seems premature. I also understand that the Applicant must carry out a material operation within 5 years to keep the permission alive but these can be quite trivial and there remains the possibility of the land and area being blighted for an indefinite period.

1.4.2. The Applicant seems to be interpreting 2.10.16 too literally and still does not specify total expected number of panels or indeed Overplanting in the next paragraph. It is not possible to decide whether 2.10.17 is satisfied or not. However I feel there remains an argument that if security arrangements can encompass flood defences, fencing, lighting and surveillance then it should include ecological mitigation and enhancement and, in particular screening which is necessary as a result of the development. The EA is not bound by the Mallard Pass decision and should give proper weight to site specific considerations.

1.9.2. The Applicants comments on food security need further clarification. I cannot see where it says in the revised NPPF that there is no need to consider the availability of agricultural land for food production. At best BMV should not be an exemption from development for other purposes where there is good reason but that does not mean its importance can be ignored. As the EA will have seen on the informal Site Visit, this is a rural area. Intensive pig and poultry farming are of great importance to the local economy. These animals are largely fed on crop based products and it would seem rather against Net Zero to import grain when it can be grown locally. The Applicant's comparison with the UAA is somewhat specious as it does not take into account the cumulative effects of similar developments locally, regionally or nationally. It is submitted that the EA can, and should, give weight to the importance of agriculture in general on the local economy.

I may make other comments at later stages of the Examination

Robertson Wade