

Town & Country Planning Act 1990 (As Amended)
Planning and Compulsory Purchase Act 2004

PLANNING STATEMENT

ON BEHALF OF RENEPOWER ENERGY LTD

Proposed Battery Storage Facility

Land Adjoining Burghfield Road Substation, West of Burghfield Road, Southcote, Reading

Ref: SP13_R_001C
LPA: Reading Borough Council
Date: July 2023

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Appendix 1: Chief Planner Planning Update Newsletter 21 December 2017

Appendix 2: Scheme Benefits Calculations

1.0 Executive Summary

- 1.1 This Planning Statement accompanies the planning application for a battery storage facility on land adjoining the SSE Burghfield Road Substation, to the west of Burghfield Road, Southcote, Reading.
- 1.2 The application site comprises an area of vacant land extending to 2,500sqm immediately adjoining to the south of Burghfield Road Substation. The site is enclosed along its eastern boundary by the private road serving the substation and is accessed from Burghfield Road via the existing vehicular access.
- 1.3 The proposed development comprises a series of 8 no. battery containers along with a transformer and inverter skid and a switchgear container, within an acoustic fence enclosure. The site surface between the equipment will be laid with a permeable gravel covering. The facility will be enclosed along its western, southern and eastern boundaries by a 1m-high earth bund with native tree and hedgerow planting, with a gap for the access point at the southeastern corner of the site, providing a total landscaping area of 890sqm.
- 1.4 The purpose of the proposed development is to receive and store electricity at times when there is excess supply on the grid and return it for consumption at times when demand for electricity exceeds otherwise available supply. Intermittent sources of renewable energy such as wind and solar are frequently curtailed because they produce electricity when it is not required. By storing electricity that would otherwise be curtailed and creating more capacity for intermittent renewables on the grid, battery storage effectively provides additional renewable electricity to the grid. It is deemed in planning terms to be a form of renewable electricity generating station as per the Chief Planner Update of 21st December 2017 (Appendix 1). The proposed development will be capable of supplying the equivalent of approximately 1600 homes with renewable electricity per annum.
- 1.5 Section 6 of this report provides an assessment of the proposals against the development plan and other material considerations. It identifies that the scheme needs to be located in close proximity to the adjoining substation in order to make use of the available connection capacity. It concludes that the proposals are broadly in accordance with the relevant policies of the development plan, and that there are no material considerations which weigh against the scheme. In light of the identified benefits, it is therefore concluded that the proposals are entirely suitable for the granting of planning permission.

2.0 Application Site & Planning History

- 2.1 The application site relates to a roughly rectangular area of vacant land immediately adjoining to the south of the SSE Burghfield Road Substation, to the west of Burghfield Road. The total area of the application red line is 2,500sqm and the footprint of the proposed battery storage facility amounts to 1,290sqm.
- 2.2 The site currently comprises largely ruderal herb covering and poor semi-improved grassland with a small area of dense scrub in the north-eastern corner. There is one tree within the application site boundary, identified in the accompanying AIA as tree T1 (Common Elder) which is proposed for removal.
- 2.3 The application site is enclosed along its eastern boundary by the private access road serving the existing substation, and along its northern boundary by the substation itself. The site is accessed via the existing vehicular access point on Burghfield Road.
- 2.4 The immediate visual context of the site is characterised by the presence of electricity infrastructure associated with the existing substation. The land parcel containing both the existing substation and the application site is enclosed by tree belts along the western and eastern boundaries, a railway embankment to the north, and a large industrial farm core to the south, which provide effective screening of the site from wider landscape views.

Flood Risk

- 2.5 The application site is located within an area of Flood Zone 3 according to the Environment Agency's online flood mapping service. Accordingly, a Flood Risk Assessment prepared by ASC has been provided in support of the proposals. The development comprises electricity infrastructure which needs to be located adjoining the existing substation and is therefore deemed to constitute essential infrastructure.

Cultural Heritage

- 2.6 The application site is not located in close proximity to a Conservation Area or any Listed Buildings. The site lies within an area designated under Local Plan policy EN2 as an Area of Archaeological Potential. Accordingly, an Archaeology Assessment prepared by BWB has been provided in support of the proposals.

3.0 Description of Proposed Development

- 3.1 The proposed development comprises a series of 8 no. battery containers along with a transformer and inverter skid and a switchgear container, within an acoustic fence enclosure. The site surface between the equipment will be laid with a permeable gravel covering. The facility will be enclosed along its western, southern and eastern boundaries by a 1m-high earth bund with native tree and hedgerow planting, with a gap for the access point at the southeastern corner of the site, providing a total landscaping area of 890sqm.
- 3.2 The following drawings and documents accompany the application in order to define the proposed development:

DRAWINGS

- AUG1415-BURGHFIELD ROAD-102-C – Site Location and Existing Plan
- AUG1415-BURGHFIELD ROAD-101-D – Proposed Site Layout
- AUG1415-BURGHFIELD ROAD-103-C-Sht 1 of 2 – Sections Site Plan
- AUG1415-BURGHFIELD ROAD-103-B-Sht 2 of 2 – Sections
- AUG1415-BURGHFIELD ROAD-301-A – Transformer & Inverter Skid Details
- AUG1415-BURGHFIELD ROAD-302-A – Battery Container Details
- AUG1415-BURGHFIELD ROAD-303-A – Switchgear Container Details
- AUG1415-BURGHFIELD ROAD-304-B-Sht 1 of 2 – Acoustic Fence Panel
- AUG1415-BURGHFIELD ROAD-304-B-Sht 2 of 2 – Acoustic Fence Gate
- 0514-05-03-1000-00 – Landscape Mitigation Plan
- 0514 Pack – Existing Views, Photowires and Photomontages

REPORTS

- Flood Risk Assessment prepared by ASC
 - Archaeology Assessment prepared by BWB
 - Arboricultural Impact Assessment prepared by Brindle & Green
 - Preliminary Ecological Appraisal prepared by Brindle & Green
 - Biodiversity Impact Assessment prepared by Brindle & Green
 - Noise Impact Assessment prepared by Ian Sharland Ltd
- 3.3 The proposed landscaping buffer will comprise native tree planting on the inner slope of the proposed earth bund and native shrub planting on the outer slope, as shown on the accompanying Landscape Mitigation Plan.

- 3.4 There are currently views through the application site from Burghfield Road toward the north in which the existing substation infrastructure is visually prominent. Once established, the proposed landscaping will screen both the proposed development and existing views of the substation, as demonstrated by the accompanying photomontages.
- 3.5 The facility will utilise the existing vehicular access from Burghfield Road along with an additional length of access track running for approximately 10m in parallel with the SSE substation access road to connect with the gated entrance to the facility.
- 3.6 The purpose of the proposed development is to receive and store renewable electricity at times when it would otherwise be curtailed due to excess supply on the grid and return it for consumption at times when demand for electricity exceeds otherwise available supply. The estimate of benefits provided as Appendix 2 to this report identifies that the proposed development will be capable of supplying the equivalent of approximately 1600 homes with renewable electricity per annum.
- 3.7 The construction phase of the proposed development will be relatively low impact, as the majority of the required equipment will be brought to site pre-assembled ready for installation.
- 3.8 Following its installation, the facility will be operated remotely and will require relatively few visits for the purposes of maintenance throughout the year. As such, additional vehicular movements to and from the site associated with the proposed development are expected to be negligible.
- 3.9 The facility will operate on a flexible basis, receiving electricity from the grid at times of surplus, and providing electricity back to the grid at times of excess demand. The operation of the site will be undertaken remotely, and no staff are required to be present on the site on a day-to-day basis.

Utilities Statement

- 3.10 The import and export of electricity to and from proposed development will be carried out via underground cabling connecting directly into the SSE Burghfield Road substation which immediately adjoins the northern boundary of the application site. No other utility connections are required for the scheme.

4.0 Relevant Planning Policy

Legislative background

- 4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise.

The Development Plan

- 4.2 The current adopted development plan is the Reading Borough Local Plan, adopted in November 2019. The following policies are considered to be of relevance to the current application.
- 4.3 **Local Plan Objective 5** seeks to “ensure [that] new development and existing areas are accessible and sustainable, in accordance with the sustainability appraisal objectives, including reducing its effects on, and adapting to, climate change.”
- 4.4 **Policy EN2** deals with Areas of Archaeological Significance, stating that in such areas an assessment of the archaeological impacts of development should be submitted before a planning application is determined.
- 4.5 **Policy EN13** deals with Major Landscape Features and Areas of Outstanding Natural Beauty. It states that “planning permission will not be granted for any development that would detract from the character or appearance of a Major Landscape Feature.”
- 4.6 **Policy CC1** establishes the presumption in favour of sustainable development at the Borough level, stating that a positive approach to considering development proposals will be taken, and restating the requirements of NPPF Paragraph 11.
- 4.7 **Policy CC2** deals with sustainable design and construction. It states that new development should use energy, water, minerals, materials and other natural resources appropriately, efficiently and with care and take account of the effects of climate change.
- 4.8 **Policy CC3** deals with adaptation to climate change. Whilst the content of the policy is largely focused on adaptation measures typical of commercial and residential development, it provides a policy basis for achieving Objective 5 of the Local Plan as summarised above.

- 4.9 **Policy C8** – Safeguarding Amenity – sets out criteria for assessing the impact of new development on the living environment of existing and future residential properties. Of relevance to the form of development proposed, the criteria include visual impact, noise and disturbance, artificial lighting, vibration, dust and fumes.
- 4.10 **Policy EN12** deals with biodiversity. It states that on all sites, development should not result in a net loss of biodiversity and should provide for a net gain for biodiversity wherever possible, including through the provision of new tree planting, wildlife friendly landscaping and ecological enhancements.
- 4.11 **Policy EN17** states that “where noise generating equipment is proposed, the noise source specific level (plant noise level) should be at least 10dBA below the existing background level as measured at the nearest noise sensitive receptor.
- 4.12 **Policy EN18** deals with flooding and sustainable drainage systems. It sets out the requirements for development to accord with the NPPF flood tests and to ensure that, where development in areas at risk of flooding is necessary, it will not increase the risk of flooding elsewhere and will be designed to reduce flood risk both on- and off-site.

The National Planning Policy Framework (“the NPPF”) July 2021

- 4.13 The revised NPPF was published in July 2021. It sets out the Government’s overarching planning policies relating to both plan-making and decision-taking. It is applicable to the determination of planning applications both in that development plan policies which are not in accordance with relevant policies in the NPPF are considered to be out-of-date – causing the Presumption in Favour of Sustainable Development to be engaged – and as a principal material consideration in its own right.
- 4.14 Paragraph 11 of the NPPF establishes the Presumption in Favour of Sustainable Development. For the purposes of decision-taking this means “*approving development proposals that accord with an up-to-date development plan without delay,*” or, “*where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless,*” of relevance to these proposals, “*ii. Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*”
- 4.15 Paragraph 130 sets out overarching aims for good design applicable to all development proposals. These include the requirement that schemes should be “*visually attractive as a result of good architecture, layout and appropriate and effective landscaping,*”

and should be *“sympathetic to local character and history, including the surrounding built environment and landscape setting.”*

- 4.16 In accordance with the Chief Planner Planning Update Newsletter of 21 December 2017, the proposed development comprises a form of renewable energy generating station. Paragraph 158 of the NPPF is therefore engaged and the following provisions apply to the proposed development:

“When determining planning applications for renewable and low carbon development, local planning authorities should:

- a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions; and*
- b) approve the application if its impacts are (or can be made) acceptable. Once suitable areas for renewable and low carbon energy have been identified in plans, local planning authorities should expect subsequent applications for commercial scale projects outside these areas to demonstrate that the proposed location meets the criteria used in identifying suitable areas.”*

- 4.17 Chapter 9 of the NPPF deals with promoting sustainable transport. Paragraph 110 sets out criteria for assessing development proposals in transport terms, requiring that they promote sustainable modes of transport, achieve safe and suitable access, include suitably designed streets, parking areas and other transport, and that any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

- 4.18 Paragraph 111 of the NPPF states that *“development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”*

5.0 The Need for the Proposed Development

- 5.1 The proposed development will form part of the National Grid's Balancing Services, which take advantage of a range of mechanisms, including electricity storage, in seeking to ensure that the electricity supply is constantly matched with levels of demand, taking into account economic growth and the transition to a low carbon energy supply system. This section provides a summary of national guidance relating to electricity reserve development and the relevance of balancing requirements as a principal material consideration.
- 5.2 In July 2011, the Department for Energy and Climate Change (DECC) released the Electricity Market Reform White Paper Planning our electric future: a White Paper for secure, affordable and low-carbon electricity. The White Paper sets out the challenge of ensuring that electricity capacity keeps pace with the changing landscape of technologies and demand. Regarding reserve electricity capacity, it states the following:

"The System Operator (SO), National Grid, is responsible for maintaining the stability of the electricity system by ensuring that supply and demand are in balance at all times. Although individual market participants will have planned ahead of time for the expected demand in each half hour, there will be times when demand is greater than forecast ... National Grid makes an assessment of how much reserve capacity is required to manage these uncertainties in the period about four hours ahead of real time. This requirement is about 4 GW, and is largely met by the Short-Term Operating Reserve (STOR), whereby National Grid contracts reserve capacity to be made available on demand.

As greater amounts of wind generation are added to the system, National Grid expects that the level of required reserve will increase, due to the need to cope with real time unexpected changes in wind generation in addition to existing challenges; this can be both the wind dropping off or blowing too hard causing generation to drop rapidly." (p.64)

- 5.3 The White Paper identifies a key barrier to more secure capacity as being the "potentially limited routes to market for some independent generation" (p.66). This issue is due in part to the permitted development rights which allow statutory undertakers to carry out development under prior notification, while new independent developments require express planning permission to be granted.

Despite its essential and increasing role in the security of the electricity supply, the provision of electricity storage falls outside the remit of the statutory undertakers and must be sourced from private developments resulting from planning permissions.

- 5.4 Increasing the amount of electricity storage across the country under the National Grid balancing programme is identified as a key solution to the growing demand balancing problem, along with Demand Side Response (DSR), reserve generation and other innovations. The White Paper sets out two options for developing a more comprehensive and secure market for meeting the capacity challenge – the Strategic Reserve and Capacity Market models – both of which depend on a large increase in the availability of electricity storage.
- 5.5 The figure below, taken from National Grid ESO's 'Future Energy Scenarios 2022' publication, demonstrates the amount of electricity storage that will be required on the grid under different scenarios for 2050:

Figure FL.03: Supply and demand flexibility in 2021, 2035 and 2050

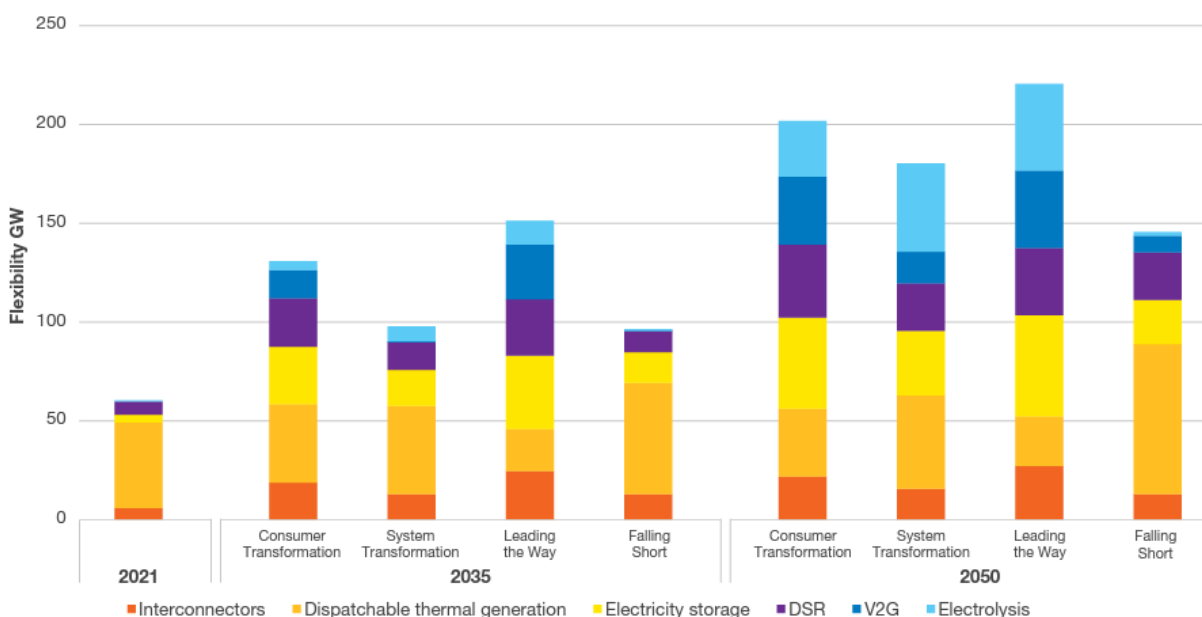


Figure 5.1 – Extract from National Grid ESO 'Future Energy Scenarios 2022'

- 5.6 Under **all** identified scenarios, the existing level of electricity storage (approximately 4GW) must be increased by orders of magnitude in order to maintain a functioning electricity supply. Even in the worst performance scenario 'Falling Short', electricity storage needs to grow by around 16GW, nearly a fourfold increase. However, under

this scenario the UK would have failed to meet its obligations for decarbonisation. In the most positive scenario 'Leading the Way', electricity storage needs to grow by 38GW – around a tenfold increase compared to the present situation. Due to the critical scarcity of substations with sufficient import and export capacity to connect battery storage developments, achieving this level of growth will require **that every possible opportunity** to connect battery storage to the grid is supported by Local Planning Authorities by according very significant weight to its benefits – preventing the failure of the electricity grid.

- 5.7 In order to make up the existing shortfall against the 'Leading the Way' scenario, more than 100 facilities of a similar scale to the current proposals will be required, and these will need to be distributed evenly throughout the country.

Critical Infrastructure for Renewable Energy Development

- 5.8 In response to the EU Renewable Energy Directive 2009/28/EC - which set a legally binding target of 15% renewables share in the energy portfolio by 2020 – a series of high-level Government documents (including the UK Renewable Energy Strategy of 2009 and the UK Low Carbon Transition Plan of 2009) and White Papers have been published to ensure that this target is met. The National Planning Policy Framework lends weight in favour of the delivery of renewable energy generating capacity and supporting infrastructure.
- 5.9 The installation of new reserve generation plant allows the overall proportion of electricity produced from renewable sources of energy to be increased nationally, for the reasons described in the 2011 White Paper. Increasing renewable generation capacity requires a proportional increase in the availability of electricity storage infrastructure in order to balance the grid. The benefits in planning terms of providing electricity storage infrastructure should therefore be assessed as being equivalent to the benefits of providing renewable energy generating development.
- 5.10 Following the announcement by the Government that battery storage technology should be considered a form of renewable generating station, battery storage also directly attracts the support of all planning policies in support of renewable energy development.

British Energy Security Strategy 2022

- 5.11 The British Energy Security Strategy was published on 7 April 2022 and sets out the Government's proposals to fast track the effort to achieve energy independence for

the UK in response to the increasing volatility of global energy costs. The document states that the Government will:

“[Encourage] all forms of flexibility with sufficient large-scale, long-duration electricity storage to balance the overall system by developing appropriate policy to enable investment.” (p.25)

- 5.12 The strategy emphasises the critical importance of delivering battery storage development, both for the purpose of achieving decarbonisation and for addressing cost of living and security risks due to reliance on external energy sources, making it clear that the urgency of the need for battery storage infrastructure continues to grow.

Applicability of Renewable Energy Policies to the Proposed Development

- 5.13 The Chief Planner’s Planning Update Newsletter issued on 21 December 2017 sets out the Government’s position regarding the status of battery storage in the context of policies relating to renewable energy (Appendix 1, p.9). It sets out the Government’s position that *“electricity storage facilities area a form of generating station.”* Since battery storage does not involve the production of electricity from fossil fuels, but instead provides electricity which would otherwise have been wasted – typically from wind and solar farms making power available during periods of excess supply – it therefore constitutes renewable energy development for the purposes of planning. **All national and local planning policies which address renewable energy development therefore also apply to battery storage development.** The assessment of the proposed development must therefore be carried out on this basis.
- 5.14 The UK Government is legally committed under the Climate Change Act 2008 to achieve an 80% reduction in greenhouse gas emissions by 2050 and has resolved to commit to a more ambitious target of net zero emissions by 2050. This target will be unachievable without the widescale delivery of battery storage infrastructure which represents the only renewable method of balancing electricity supply and demand. For this reason, all opportunities to deliver battery storage facilities must be supported and given critical priority through the planning system, and in light of the scarcity of technically suitable sites and the need to provide a decentralised service, they should be considered to have an essential need to be located in close proximity to their connection point.

6.0 Assessment of the Proposed Development

Principle of Development

- 6.1 The application site is located outside of any boundaries set out on the Local Plan Proposals Map for the purpose of designating forms of development. The development plan is silent on the matter of electricity infrastructure in respect of spatial strategy and suitable locations for development. In these circumstances NPPF para. 11 directs that planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.
- 6.2 Battery storage development has an essential requirement to be sited where there is an available grid connection that can accommodate both the import and export capacity of the scheme. An available connection has been identified at the SSE Burghfield Road substation, which adjoins the site. Apart from the technical requirement, co-location brings other benefits including minimisation of visual impact by sharing the existing visual context, minimising impacts on residential amenity due to the substation already being located at a safe distance from residential development, sharing existing access arrangements and securing planning gain from the proposed landscaping as a result of screening the existing as well as the proposed infrastructure.
- 6.3 The benefits of the proposed development can be summarised as follows:
- The direct contribution of the development towards the provision of renewable electricity, as per the calculations provided at Appendix 1. Based on a site capacity of 5MW on average across the scheme lifetime (installed at 7.4MW accounting for reducing efficiency over time) the development will facilitate the equivalent of around 1600 homes being supplied by renewable electricity every year;
 - The contribution of the development towards reducing the risk of grid failure by making a meaningful contribution towards the urgent need to increase the amount of battery storage available to the grid in line with National Grid's targets for 2050;
 - The scheme's contribution to national energy security by increasing the flexibility and adaptability of the grid, allowing more renewable sources of electricity to be connected, and reducing the level of grid exposure to international energy markets; and
 - The need for the development to be co-located with the Burghfield Road substation, in order to take advantage of the available connection capacity.

- 6.4 These benefits taken together are considered to attract significant weight, while – for the reasons discussed below – any adverse impacts are comparatively minor and further mitigated by the landscaping proposals and the potential for planning conditions to address impacts associated with the construction phase. For these reasons it is considered that the principle of the proposed development is clearly established.

Visual and Landscape Impact

- 6.5 The immediate visual context of the site is characterised by the presence of electricity infrastructure associated with the existing substation. The land parcel containing both the existing substation and the application site is enclosed by tree belts along the western and eastern boundaries, a railway embankment to the north, and a large industrial farm core to the south, which provide effective screening of the site from wider landscape views.
- 6.6 While the site is located within a Major Landscape Feature designated under Policy EN13, the site itself is not considered to make a significant contribution to the policy objective because in its current form it is visually dominated by the adjoining substation infrastructure, and the wider parcel of land containing it is effectively enclosed by tree belts and existing development such that it is not prominent in wider landscape views.
- 6.7 The proposed development will reflect the electricity infrastructure character established by the existing substation and will therefore not result in a significant degree of visual change. There are currently views through the site from the nearest publicly accessible location on Burghfield Road, in which the existing substation infrastructure is the dominant visual feature. These views will be intersected by the proposed landscaping buffer which will adjoin the southern and western boundaries of the facility. As such, in addition to further mitigating the visual impact of the proposed development, the landscaping buffer will also reduce visibility of the existing substation leading to an improvement in visual character as experienced from Burghfield Road. These effects are demonstrated by the accompanying photomontages showing the view from Burghfield Road to the south and the view from open land south of Rangewood Avenue, just north of the railway line.
- 6.8 For these reasons, the overall visual impact of the proposed development is considered to be acceptable, and in any event not so significant that it could be considered to detract from the character or appearance of the Major Landscape Feature. It is therefore concluded that the proposals accord with the requirements of the development plan in this regard.

- 6.9 In circumstances where the impact of the scheme on the Major Landscape Feature was considered to be in conflict with Policy EN13, the degree of policy conflict would be clearly and demonstrably outweighed by the identified benefits of the scheme.

Access and Highways

- 6.10 The proposed development will make use of the existing vehicular access point on Burghfield Road. Following the construction phase, the proposed facility will be remotely operated and will only require infrequent trips by service personnel for the purposes of maintenance. The transport impact of the proposals will therefore be negligible, and the scheme is considered to be fully compliant with the development plan and national policy in this regard.

Noise Impact

- 6.11 The accompanying Acoustic Design Specification prepared by Ian Sharland Ltd provides an assessment of the potential noise impacts of the proposed development, taking into account the proposed acoustic fence enclosure and engineered attenuation of equipment as specified at paragraph 4.4. The assessment demonstrates that noise levels at the nearest sensitive receptors will fall below existing background noise levels at all times. Noise from the proposed development will be 10dB lower than the BS8233 recommended standard for daytime operation and 10dB lower than the equivalent standard for night-time operation, exceeding the Policy EN17 target (10dB below background noise levels) for daytime operation and meets the target for night-time operation. The scheme therefore fully complies with the relevant requirements of Policy C8 and the specific requirements of Policy EN17 in respect of noise.

Flood Risk Assessment

- 6.12 The application is supported by a site-specific Flood Risk Assessment (FRA) prepared by ASC. The FRA confirms that the proposed development passes both the NPPF sequential test and exception test, due to the requirement for the facility to be co-located with the adjoining substation, and the need for the development as a form of essential infrastructure.
- 6.13 The FRA also provides an outline drainage strategy making use of permeable granular surfacing within the compound along with below ground attenuation storage to ensure that all exceedance flows will be contained within the site boundary and the development will not increase the risk of flooding elsewhere. Final details of the

surface water drainage strategy may be secured via appropriately worded planning conditions.

Trees and Ecology

- 6.14 The application is accompanied by an Arboricultural Impact Assessment (AIA) prepared by Brindle & Green which sets out the findings of the tree survey. One tree has been identified within the site boundary – a Common Elder designated T1, located close to the boundary with the SSE substation, which is proposed to be removed in order to facilitate the development. The AIA concludes that the tree has no landscape value and is suitable for removal. The proposed landscaping buffer will provide a 325sqm area of new native tree and hedgerow planting which will adequately compensate for the removal of T1.
- 6.15 The application is also accompanied by a Preliminary Ecological Appraisal (PEA) prepared by Brindle & Green. The PEA identifies that the site has negligible suitability for foraging and commuting bats, no evidence of badger setts or activity on the site, no waterbodies suitable to support Great Crested Newt, and no evidence of reptiles on the site. Accordingly, no further ecological survey work is recommended. The accompanying Biodiversity Impact Assessment demonstrates that the scheme will achieve a biodiversity net gain of 2.52%, in line with the requirements of NPPF 174(c).
- 6.16 Recommendations are set out for a Construction Ecological Management Plan to be secured by condition, provision of suitable habitat and plant species within the proposed landscaping areas, protection of breeding birds and reptiles during the construction phase, hedgehog gaps, and sensitive lighting to minimise impacts on foraging and commuting bats. The applicant confirms their agreement to incorporate these recommendations, which may be secured through the use of planning conditions.

Archaeology

- 6.17 Due to the location of the site within an Area of Archaeological Potential designated under Policy EN2, the application is supported by an Archaeology Assessment prepared by BWB. The assessment identifies that the site has been disturbed by historic use as a compound which has reduced its archaeological potential to 'Low'. The report concludes that the proposed form of development is relatively low impact due to the lack of deep excavation required, and therefore restricted to the superficial deposits which have previously been disturbed. The impact is assessed to be neutral or negligible, and no archaeological mitigation works are recommended.

7.0 Planning Balance & Conclusions

7.1 The assessment set out at Section 6 of this statement has demonstrated that the proposed development accords with all relevant policies of the development plan and the National Planning Policy Framework. In particular it has been found that:

- The principle of development is established by virtue of the need for the development to be co-located with the existing substation adjoining the application site, and the overall finding that the benefits of the scheme clearly and demonstrably and adverse impacts;
- The development will result in a range of benefits, including supplying the equivalent of 800 homes with renewable electricity per year by preventing renewable curtailment and increasing the capacity for new renewable generation to be added to the grid, reducing the risk of grid failure and rolling blackouts by contributing towards National Grid's urgent requirements to increase the availability of electricity storage infrastructure, and contributing to the UK's overall national energy security by increasing the flexibility and adaptability of the grid and reducing reliance on unstable sources of energy on the international market. Taken together these benefits weigh significantly in favour of the proposals;
- The scheme will not result in any unacceptable visual or landscape impacts, due to the scheme reflecting the character of the immediate locality which is characterised by electricity infrastructure associated with the existing substation, the enclosed nature of the wider parcel of land in which the site is located, and mitigation in the form of the proposed landscaping buffer, which will also serve to mitigate the existing visual impact of the adjoining substation;
- The development will not result in any unacceptable impacts in respect of trees and ecology, with new native habitat to be established through the provision of a boundary landscaping buffer; and
- The proposals have adequately addressed all relevant technical considerations, including achieving required limitations on noise levels, suitable provisions for flood risk and surface water drainage, and archaeological assessment.

7.2 The proposals have been shown to be in accordance with all relevant policies of the development plan. Relevant policies of the NPPF lend support to the proposals as a key material consideration. The other key material consideration in this case comprises the identified benefits of the scheme, which are significant and attract substantial additional weight in its favour. For these reasons it is concluded that the proposals are entirely suitable for the granting of planning permission.

Appendix 1

Chief Planner Planning Update Newsletter 21 December 2017

Appendix 2

Scheme Benefits Calculations