

PLANNING STATEMENT

Planning application for an electricity battery storage facility on land north of Twibell Street, Barnsley, S71 1JE

Prepared by:
UK Energy Reserve Limited
6th Floor,
Radcliffe House,
Blenheim Court,
Solihull,
West Midlands,
B91 2AA.

Company no. 10260309



Dated July 2017

Contents

1. Introduction
2. Proposed Development
3. EIA Screening
4. Planning Framework
5. Planning Policy
6. Other Material Planning Considerations
7. Planning Appraisal
8. Conclusion

1. INTRODUCTION

- 1.1 This Planning Statement has been prepared in support of a full planning application submitted by UK Energy Reserve Limited (“UKER”) for an electricity battery storage facility on land north of Twibell Street, Barnsley, S71 1JE (the “Proposed Development Site”).
- 1.2 The purpose of this Planning Statement is to provide an assessment of the Proposed Development against relevant planning policy and guidance and, if appropriate, set out material considerations which justify a departure. This Statement demonstrates that the application has taken account of the constraints of the Proposed Development Site and accords with planning policy and guidance.

Planning History

- 1.3 From a review of the Development Plan it shows that the Proposed Development Site is located within the settlement boundary of Barnsley but is not allocated for any specific land use. There is no recent relevant planning history for the site. An application was determined in August 2016 on land immediately to the west which permitted the subdivision and change of use of the existing warehouse to create 2no. units with flexible permission for either A1 or B8 use.

2. PROPOSED DEVELOPMENT

Proposed Development Site

- 2.1 The Proposed Development Site is located on land north of Twibell Street, Barnsley, S71 1JE. The site is accessed via an existing site access on Twibell Street. The site location is shown in the accompanying Location Plan Ref: 17284/101 Rev.1 at Appendix A.
- 2.2 The Proposed Development Site is situated within an existing industrial estate and comprises a concreted area with small ruderals and grasses growing along seams between the concrete slabs. The site therefore constitutes vacant brownfield land. There are some piles of earth and landscaping debris. To the east of the site lies a distribution warehouse. There are additional industrial buildings to the west. Immediately north of the site lies additional hardstanding. Beyond the the boundary to the north is the River Dearne and the Dearne Valley Country Park. To the south is Twibell Street and Barnsley Park Trading Estate.

Proposed Development

- 2.3 In June 2016, the Energy and Climate Change Committee published their Low Carbon Network Infrastructure Report. This recommended the rapid roll-out of battery storage in order to support the development of a low carbon economy. The Proposed Development would contribute to this national programme to provide cost effective, flexible energy during peak electricity periods. It would also provide local energy security as, unlike national energy generation, it would feed electricity into the local electricity network at the point of need thereby ensuring that the lights stay on for local residents and businesses.
- 2.4 The Proposed Development comprises a large portal framed building with dual pitched roof which would reflect the appearance of other buildings nearby. Outside of the building would be ancillary infrastructure to facilitate the import and export of electricity. The proposed layout is shown in the accompanying Site Plan Ref: 17284/102.1: Rev.1 and 17284/102.2 Rev.1 at Appendix B, and Elevations & Block Plan Ref: 17284/103: Rev.1 at Appendix C. Further detail on the design and appearance of the component parts is contained within the Supporting Statement.

3. EIA SCREENING

- 3.1 In accordance with the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011 the Proposed Development may be classed as Schedule 2 development (3f – surface storage of fossil fuels). However, as there are no new buildings or structures with an area of over 500sqm, it falls below the size threshold set by the EIA Regulations. The site does not comprise a “sensitive area” as defined in the Regulations and there are no significant environmental effects. It is therefore resolved that EIA is not required and the LPA may proceed to determine the application.

4. PLANNING FRAMEWORK

- 4.1 This application will be determined by Barnsley Metropolitan Borough Council (the Local Planning Authority) as the proposal, although electricity storage is not specifically identified, falls below the threshold for energy generation projects established within the Planning Act 2008 which states:

“The construction or extension of a generating station is within section 14(1) (a) only if the generating station is or (when constructed or extended) is expected to be within subsection (2) or (3).

A generating station is within subsection (2) if —

- *It is in England or Wales,*
- *It is not an offshore generating station, and;*
- *Its capacity is more than 50 megawatts.”*

- 4.2 As the storage capacity of the Proposed Development Site is 20MW, it clearly falls below this threshold.
- 4.3 Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990. Planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise.
- 4.4 The relevant planning policy framework consists of:
- National Planning Policy Framework (NPPF);
 - Barnsley Core Strategy Development Plan Document (adopted September 2011); and
 - Barnsley Unitary Development Plan (adopted December 2000).

5. PLANNING POLICY

National Planning Policy Framework

5.1 The National Planning Policy Framework (“NPPF”) was published in March 2012 and forms an important material consideration to the Proposed Development. The ‘golden thread’ running through the document is the need to contribute to achieving sustainable development. Central to this are three dimensions: economic, social and environmental. These roles should not be undertaken in isolation, because they are mutually dependent and to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system.

5.2 The NPPF emphasises the vital role that planning has in supporting and building a strong, competitive economy. Paragraph 18 states that:

“The Government is committed to securing economic growth in order to create jobs and prosperity, building on the country’s inherent strengths, and to meeting the twin challenges of global competition and of a low carbon future.”

5.3 Paragraphs 19 and 20 go on to state that:

“...significant weight should be placed on the need to support economic growth through the planning system...and that...planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century.”

5.4 Paragraph 97 states “to help increase the use and supply of renewable and low carbon energy, local planning authorities should recognise the responsibility on all communities to contribute to energy generation from renewable or low carbon sources.” It goes on to say that LPAs should “identify opportunities where development can draw its energy supply from decentralised, renewable or low carbon energy supply systems.”

5.5 Paragraph 98 confirms that “when determining planning applications, local planning authorities should:

- *not require applicants for energy development to demonstrate the overall need for renewable or low carbon energy and also recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions; and*
- *approve the application if its impacts are (or can be made) acceptable.”*

Local Planning Policy

5.6 The Proposed Development has been considered against policies contained within Barnsley’s Core Strategy Development Plan Document, adopted September 2011 and the Saved Policies of Barnsley’s Unitary Development Plan, adopted December 2000. The Proposed Development Site is within the settlement boundary but not allocated for any particular land use.

- 5.7 Core Strategy Policy CSP1 states that development proposals will be required to include details of their sustainability within their Design and Access Statement. This will include the consideration of factors such as energy efficiency, water conservation, flood risk, green infrastructure provision and community impacts.
- 5.8 Core Strategy Policy CSP6 supports proposals for renewable energy unless there are significant harmful effects which cannot be prevented or mitigated against. Proposals should be accompanied by information setting out the effects of the proposal and any proposals to reduce or mitigate against the effect.
- 5.9 Core Strategy Policy CSP8 states that priority will be given to development in the following locations:
- Urban Barnsley
 - Principal Towns of Cudworth, Wombwell, Hoyland, Goldthorpe (Dearne Towns), Penistone and Royston
- 5.10 Core Strategy Policy CSP29 states that development should, wherever possible and practicable, respect the architecture of Barnsley. This includes contributing towards creating attractive, sustainable and successful neighbourhoods.
- 5.11 Core Strategy Policy CSP40 requires development to demonstrate that it is not likely to result, directly or indirectly, in an increase in air, surface water and groundwater, noise, smell, dust, vibration, light or other pollution which would unacceptably affect or cause a nuisance to the natural and built environment or to people.

6. OTHER MATERIAL PLANNING CONSIDERATIONS

National Energy Policy

- 6.1 It is important to consider the significance of the proposal in meeting national policy to support the economy by ensuring continuity of energy supply. The relevant policy is provided by the overarching National Energy Statement for Energy (EN-1).
- 6.2 Paragraph 2.2.20 of EN-1 is concerned with national security of energy supply and states:
- “It is critical that the UK continues to have secure and reliable supplies of electricity as we make the transition to a low carbon economy. To manage the risks to achieving security of supply we need sufficient electricity capacity (including a greater proportion of low carbon generation) to meet demand at all times. Electricity cannot be stored so demand for it must be simultaneously and continuously met by its supply. This requires a safety margin of spare capacity to accommodate unforeseen fluctuations in supply or demand.”*
- 6.3 Whilst the policy includes a shift towards low carbon generation, it must be acknowledged that the contribution of renewable technologies is, in the case of wind turbines, dependent upon the weather and therefore unpredictable.
- 6.4 The Proposed Development therefore conforms to national energy policy and would support a more resilient system that should deal with unexpected events, and consequently:
- “...lower the risk of a supply interruption. This helps to protect businesses and consumers, including vulnerable households, from rising and volatile prices and eventually, from physical interruptions to supplies that might impact on essential services.”* (EN-1, paragraph 3.3.3)

The Energy Act 2013

- 6.5 The Energy Act 2013 is the primary legislation that enables Electricity Market Reform (EMR), including the implementation of the Capacity Market (CM). The delivery of the EMR is a key objective of the Government’s objective to secure energy on the way to a sustainable low carbon future. The government has established the CM and it is intended to incentivise investment in more sustainable, low-carbon electricity capacity at the least cost for energy consumers. This is needed to help secure electricity supplies for the future.

Building Our Industrial Strategy 2016– Green Paper

- 6.6 Building storage capacity together with smart use of transmission and distribution systems are therefore now a priority for UK Government. Westminster’s Modern Industrial Strategy currently at the Green Paper stage but due to be published this month puts energy efficiency and storage at its heart, seeing new technological development key to the country’s ambitions in global markets. Of relevance is the need to better match infrastructure to local plans, using infrastructure to support local growth. It goes on to

identify that, local councils' choices about where to encourage development are constrained by a lack of resources to carry out infrastructure requirements to make sites viable, including installing utilities such as electricity, water and sewerage.

7. PLANNING APPRAISAL

7.1 This section considers the Proposed Development against the provisions of the local development framework and other material considerations and covers the following:

- Principle of development
- Need for Proposed Development
- Suitability of Proposed Location

7.2 Other material considerations:

- Sustainable Development
- Design/Visual Impact
- Noise
- Ecology
- Coal Mining Risk

Principle of the Development

Need for the Proposed Development

7.3 The urgent need for new energy infrastructure to support the UK's shift towards low carbon energy is set out in the National Policy Statement for Energy Infrastructure EN-1 as described above. Under the direction of the Energy Act 2013, this Proposed Development would operate within the Capacity Market and therefore contribute to the Government's key objective to secure energy on the way to a sustainable low carbon future. The Proposed Development would provide electricity to meet the Electricity Market Reform objectives which are:

- decarbonise electricity generation by providing certainty to support renewable energy generation.
- keep the lights on by being able to react to peaks in consumer demand
- minimise the cost of electricity to consumers by providing a cost effective solution

7.4 The principal use of the Proposed Development Site would be to provide a facility to store electricity at times of surplus and release electricity at times of peak demand. The Proposed Development would operate through a series of containerised units. Within the units would be large battery cells that convert electricity into electrochemical energy that is then stored, before being converted back to electricity for exporting into the local distribution network. Further details on the need for the Proposed Development are contained in Section 2 of the Supporting Statement.

- 7.5 The Proposed Development would ensure security of supply whilst providing support to the progressive move towards renewable energy and a low carbon economy, therefore is in accordance with NPPF paragraphs 19 and 20.
- 7.6 Given the above context, the Proposed Development is therefore of national strategic importance and should be afforded significant material weight. It is also supported by national government as a mechanism to provide localised energy supply which is more responsive than traditional centralised energy generation thereby contributing to low carbon energy and being able to provide a balance to renewable energy generation. It is therefore considered to accord with Barnsley Core Strategy Policy CSP1 and CSP6, NPPF paragraphs 97 and 98, and national energy policy.

Suitability of Proposed Location

Site Selection Process

- 7.7 The Proposed Development follows an extensive site selection process undertaken by UKER. This review of potential sites is based upon the following criteria:
- Availability of grid connection
 - Availability of land
 - Proximity to residential uses
 - Other physical site constraints
- 7.8 The Proposed Development constitutes ‘embedded energy’ which means the proposed facility would feed its power into the Local Distribution Network Operator (DNO) network close to the point of use, rather than into the National Grid. This has the distinct benefit of greatly improving the carbon efficiency of the storage facility by avoiding transmission losses which may otherwise occur over long distances associated with the current centralised network.
- 7.9 UKER has therefore assessed local distribution networks to identify sites close to DNO primary substations where the network has capacity to accept embedded supply. To be viable, the proposed storage facility needs to be close to a substation which has capacity to export the power. The “acceptable cost” of electricity production is not set by UKER, but rather the reverse auction of the Capacity Market exists to ensure the government is procuring energy at the most competitive costs possible. For the government to keep energy costs per household at a manageable level, flexible generation facilities such as that being proposed need to be able to connect at an acceptable cost.
- 7.10 The first stage of the site selection process therefore, was to identify those areas which have a commercially viable and available grid connection.
- 7.11 Once this area was identified, UKER carried out a review of land to identify an available and suitable site for the proposed storage facility. In line with national planning policy, brownfield sites were reviewed in

the first instance. Given the industrial nature of the Proposed Development, existing brownfield land in or near industrial land is considered the most suitable locations. Sites also need to be an acceptable distance from nearby residential and commercial properties in order to preserve amenity. Potential sites were also reviewed regarding their physical constraints such as flood risk, topography, ecological constraints and landscape and visual impact considerations.

- 7.12 Given the need to satisfy all the above considerations, there are a limited number of suitable sites which can accommodate the Proposed Development. Somewhat compounding these difficulties, small scale embedded generation often ‘falls between stools’ in terms of planning policy designation as they are categorised as a Sui Generis Use Class. Their development in retail parks and industrial areas therefore often falls contrary to policies seeking to retain these areas for A-Class or B-Class Uses, despite these largely being the most appropriate locations for the proposals.
- 7.13 For the above reasons, the Proposed Development, through the identification of a vacant brownfield site, has sought to minimise impacts on biodiversity, geodiversity, landscape character and areas of recreational or agricultural value by selecting a site which meets the technical viability requirements of this type of development. It is therefore considered that the Proposed Development accords with policies for environmental protection within the Barnsley Core Strategy.

Suitability of the Proposed Development Site

- 7.14 Considering the above context, the Proposed Development Site is considered highly suitable for the proposed storage facility. It is vacant brownfield land, which is within an area characterised by warehousing and other industrial uses. The Proposed Development would bring an active use to the site which would benefit the local economy and support the future regeneration of the area.
- 7.15 The rest of this Statement goes on to provide an overview of the other material considerations of the site. It demonstrates that, with regard to the physical constraints of the site and the nature of the surrounding uses, the Proposed Development would not result in any adverse impacts which would significantly and demonstrably outweigh the economic benefits of the development.

Other Material Considerations

Sustainable Development

- 7.16 The golden thread within the National Planning Policy Framework seeks to ensure that development contributes to sustainable development. The Proposed Development forms part of this wider national need to deliver innovative ways to manage energy supply and demand in a manner which would support our increased reliance on low carbon sources.
- 7.17 The provision of a secure and reliable electricity supply is at the cornerstone of today’s society and can be considered to make an essential contribution to promoting social well-being and economic development. Providing a localised, low carbon electricity supply which is capable of plugging the gap when the national

electricity infrastructure is in stress means that electricity is being provided in the most efficient manner with the minimum negative impact on the environment.

- 7.18 As stated previously, the Proposed Development would also support the generation of energy from renewable sources as it would enable the elimination of the intermittency of supply without the need to maintain a large centralised spinning reserve.
- 7.19 For the above reasons, it is considered that this development constitutes sustainable development through its support of electricity to local residents and businesses in a manner which is both efficient and contributes to the mitigation of the impacts of climate change. It is therefore considered that the Proposed Development is in accordance with the NPPF.

Design and Visual Impact

- 7.20 The Proposed Development Site is located within an area characterised by warehousing and others industrial uses and, as such, is an area of limited architectural and visual merit. The Proposed Development is of a utilitarian design focussing on functional efficiency and minimising the overall development footprint. UKER is willing to consider further measures suggest by consultees to reduce the visual impact and that these can be implemented through the inclusion of a condition but are not critical to the determination of this application. It is therefore considered that the Proposed Development is in accordance with Core Strategy CSP29.

Environmental Impacts

- 7.21 Chapter 7 in the Supporting Statement summarises the supporting environmental studies which have been completed to support the planning application. It is not the intention of this Statement to repeat information provided elsewhere in support of this application. Through the provision of supporting studies and information, UKER has demonstrated that the environmental impacts in relation to noise emissions, ecology and visual impact would not be significant on the environment or local residents. Therefore, the Proposed Development conforms with Core Strategy Policy CSP40, national planning policy and appropriate environmental requirements prescribed in other guidance and legislation.

8. CONCLUSION

- 8.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990 applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise.
- 8.2 The golden thread within current planning policy is a presumption in favour of sustainable development. This Statement demonstrates that the principle of sustainable development has been considered and that the Proposed Development accords with the Core Strategy and NPPF.
- 8.3 The Proposed Development is constrained by the identification of a site which has a viable grid connection and is commercially available. It has been demonstrated that the harm to the environment is negligible as the Proposed Development Site is located on vacant brownfield land within an area characterised by warehousing and other industrial uses and is reasonably well screened by the built environment. There would be no direct impact on employment opportunities or the availability of employment land and the Proposed Development could lead to indirect economic benefits. It is therefore concluded that there are material considerations why the Proposed Development is considered appropriate in this location.
- 8.4 The Proposed Development forms part of a wider national initiative to deliver innovative ways to manage energy supply and demand in a manner which supports the increased reliance on low carbon sources. It is also supported by national government as a mechanism to provide localised energy generation which is more responsive than traditional centralised energy generation thereby contributing to low carbon generation and providing a balance to renewable energy generation. The Proposed Development is therefore of national strategic importance and should be afforded significant material weight.
- 8.5 The Supporting Statement and appendices demonstrate that there would be no significant environmental harm from the implementation of the Proposed Development and therefore accords with Core Strategy Policy CSP40.
- 8.6 Nationally, the Proposed Development reflects the Government's energy policy priorities in relation to promoting a decentralised electricity network which can respond in an efficient and effective way to the modern demands of businesses and residents and ensure security of supply. It is considered that this is a material consideration and should be afforded significant weight in the determination of this application.
- 8.7 For the above reasons, when read in conjunction with other Statements and studies submitted with this planning application, it is considered that this development accords with the Local Plan or material planning considerations exist to enable Barnsley Metropolitan Borough Council to approve this planning application.