PLANNING, DESIGN & ACCESS STATEMENT

In respect of:

SHORT TERM OPERATING RESERVE AND ANCILLARY WORKS

LAND AT WHALEY ROAD, BARNSLEY

On behalf of:

PEAK POWER CONNECTIONS LIMITED

Ref: RCA400b

Date: June 2017

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EXECUTIVE SUMMARY

This Planning, Design and Access Statement is submitted in support of a planning application for a Short Term Operating Reserve (STOR) power generating facility including fencing and associated plant equipment on land at Whaley Road, Barnsley.

The purpose of this statement is to provide an assessment of the proposed development against the relevant policies of the Development Plan, taking into account any relevant material considerations and site constraints.

The site is located within a small established industrial area along Whaley Road known as South Yorkshire (Redbrook) Industrial Estate. The immediate industrial area is linear in shape, bounded by Whaley Road and the A637. A mixture of warehouse and residential lies to the west-north-west of the A637. To the east of Whaley Road, is a concrete manufacturing plant.

The site is connected to the main gas grid and the generators will be fuelled by natural gas. Air Quality and Noise Assessments have been commissioned to identify potential impacts, however, no significant impacts arise from the scenarios assessed (see accompanying reports).

The site is not subject to a local ecological designation (such as a SSSI or SINC), is unconstrained by heritage and conservation designations and is not subject to any formal statutory protection. Notwithstanding this; noise, air quality and ecological reports have been commissioned and are submitted with this application.

The proposal is a response to market signals from National Grid who are under a statutory duty to ensure a secure supply of energy. The proposed facility will provide emergency reserve electricity to the National Grid, at times when the level of national electricity demand exceeds the level of available supply from base load power stations. For this reason, the facility will only operate intermittently according to remote request during an 'energy gap'.

The facility not only meets a national need, it will support the local economy by providing secure energy to the industrial estate and wider area at times of peak energy demand.

This is considered to be a material planning consideration which should be given significant weight in the planning balance.

The process of communication between the facility and the National Grid will be fully automated. Once installed, the site will require only infrequent visits for the purposes of maintenance. These visits by an engineer are unlikely to exceed one visit per month on average. To that end, a transport statement is considered unnecessary.

Although there are policies which are relevant and applicable to the proposal, the Core Strategy is silent with regards to this specific type of development. The Core Strategy does not make provision for infrastructure development - which is a requirement of the Framework. It should therefore be considered on its own merits and material considerations given due weight. The location of the application site is in alignment with policy concerning location due to its brownfield nature and location within a predominantly industrial area. No significant negative ecological or air quality impacts will arise from the development.

It is respectfully requested that the council support these proposals and grant permission without delay.

1.0 INTRODUCTION

1.1 This Planning, Design and Access Statement supports a planning application for the development of a STOR power generating facility on land at Whaley Road, Barnsley (the site) submitted on behalf of Peak Power Limited (the applicant) by RCA Regeneration (the Agent).

1.2 At less than 0.5 ha in size, the development falls outside the provisions of Schedule 2 of the Town and Country Planning (Environmental Impact) Regulations 2011 and therefore does not constitute EIA development.

1.3 The full details of the proposed development are set out on the following plans, drawings and reports accompanying this submission:

- Site Location Plan
- Proposed Site Plan
- Elevation Plans
- Air Quality Report
- Noise Report
- Ecological PEA

1.4 The National Grid has a number of sites across the country capable of producing small amounts of electricity at short notice. This proposal will be such a site.

2.0 THE NEED FOR SHORT TERM OPERATING RESERVE

2.1 National Grid has a statutory duty to ensure that the supply of electricity in the United Kingdom remains within certain limits in relation to demand. The balance of supply and demand within the Grid is known as system 'frequency'. Frequency is continuously changing as levels of electricity generation and consumption fluctuate. At times, the generation from baseload power stations is insufficient to meet demand when there are spikes in consumption. There are also times when baseload generation unexpectedly becomes unavailable, with the same effect.

2.2 In order to avoid the need for rolling blackouts and other extreme demand control measures at these times, National Grid procures a range of Balancing Services. These include demand response services (where large electricity consumers agree to reduce their consumption during low frequency events), and operating reserve (where distributed standby generators operate only when called on to do so).

Predicted Frequency Response Requirements

2.3 System inertia is the measure of the vulnerability of the National Grid to occasions of low frequency when balancing (or 'frequency response') will be required. As system inertia reduces, change in system frequency will become more regular and a larger provision of frequency response will be required to maintain stability.

2.4 The National Grid's forecast of its system requirements is set out in the System Operability Framework (SOF), most recently published in November 2015. Section 4.4 of the SOF sets out the expectation of National Grid for Frequency Response Providers, they are *"scheduled to alter generation or demand to redress the demand-supply mismatch cause by an unexpected event on the system such as the loss of a generator"*. The most recent SOF identifies that, taking into account all future energy scenarios modelled by the National Grid, "*the amount of frequency response required will increase by 3 to 4 times from the current level"* by 2030. Figure 1 (adapted from Figure 18 of the SOF) illustrates the predicted response requirements for each scenario.

2.5 In addition to the medium-term requirements beyond 2020, the National Grid has identified that "*under all scenarios response requirements increase by approximately 30% - 40% within the next five years*" – from 2015 to 2020.

2.6 There is an urgent need for new frequency response assets to be secured in order to provide sufficient capacity for the National Grid to balance supply and demand in the short term (2015 to 2020) and medium term (2020 to 2030). National Grid's approach is to procure these requirements through the Capacity Market mechanism from third parties who will develop and operate facilities.

2.7 Under the Capacity Market Regulations 2014 and Capacity Market Rules, the Government has determined a defined threshold which will trigger a Capacity Market Notice (CMN). It has been set at 500MW above the sum of expected demand and an operating margin (see Figure 1) they are triggered automatically when generation is below 500MW



Figure 1 Capacity Market Notices

2.8 In October 2016, National Grid released the first capacity market notice for the first time for providers to ready themselves as the gap between supply and demand narrowed (known as the buffer zone).

2.9 Capacity market notices are issued automatically, four hours ahead of when the grid's excess capacity is forecast to fall below 500MW. This threshold is over and above the standard capacity margin safety net the grid maintains in order to ward off power cuts.

2.10 In 2015, the buffer zone reached its lowest level in a decade at 5.1%, increasing the risk of blackouts across the country. The UK does not currently support a strong enough portfolio of alternative energy solutions to sustain the growing energy demand at peak time on a cold, windless day. National Grid were prompted by Ofgem to re-start coal power plants which were dormant over the summer or due to close to ensure security of supply. As the UK government plans to close all coal power stations by 2025, the balancing reserve system and facilities such as this are needed to ensure continued supply during the winter months.

2.11 As the long-term aim is to move towards more renewable energy sources and greater amounts of wind generation is added to the system, National Grid expects the level of required Short Term Operating Reserve will increase from 4GW to cope with unexpected real time changes. Peak Power Connections Ltd is one such organisation promoting these facilities.

2.12 Due to the limits on provision from each provider and the need for locations in proximity to viable Grid connections, sites providing STOR will be widely distributed across the country. There are significant constraints to the availability of sufficient Grid connection capacity UK-wide, and this will also limit the range of feasible sites. The National Grid also has specific requirements for providers including:

- There must be a valid Grid connection offer in place;
- The applicant must have a legal right to use the land;
- The proposed technology must meet the technical criteria; and
- Applicants must be able to demonstrate that financing is in place.

2.13 As a result of these factors, significant favourable weight should be accorded (as a material planning consideration) to all proposals in locations where there is a Grid connection offer in place and which adjoin or are in close proximity to an existing connection point.

2.14 To summarise, there is a real need for peak power generation to cover peaks in demand in order to reduce losses from the generation. Sites need to be located close to the demand and have connection to both the National Grid (via suitable substations) and to an alternative power source, gas being the most

environmentally suitable. This site is therefore ideal and this should add considerable weight to planning considerations.

3.0 SITE DESCRIPTION

3.1 The site lies in an area currently used for external industrial storage and is effectively surrounded by industrial activity. South Yorkshire Industrial Estate falls within the urban fabric of Barnsley but is surrounded by green space to the north, west and south. To the east lies further industrial uses.

3.2 The site itself is located within the estate bounded by industrial uses on all sides. Beyond the industrial area and railway line there is open green space (see figure 2). The surrounding uses provide a buffer which protects amenity.

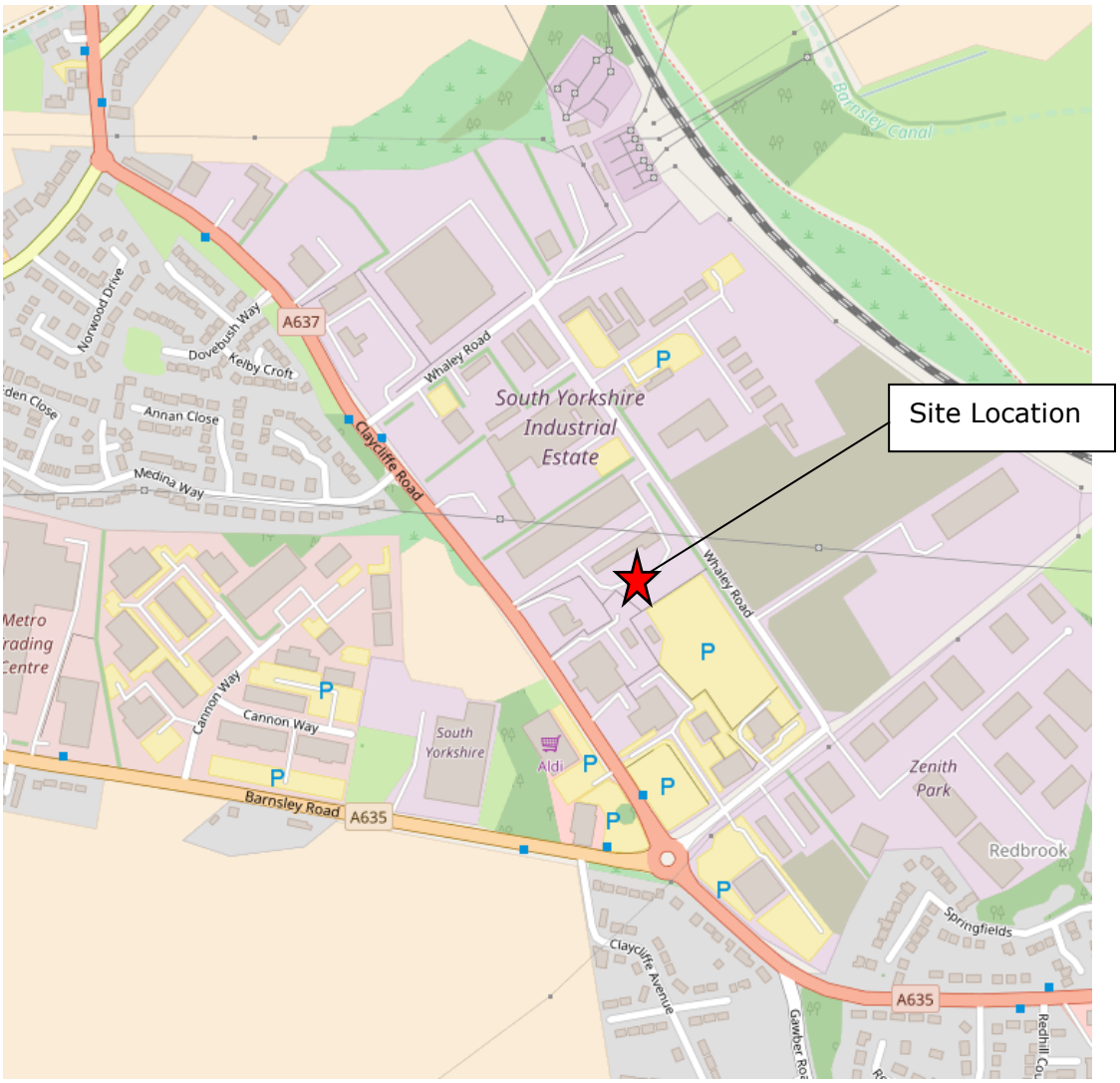


Figure 2 Site Location

3.3 The application site is owned by Joe Pole Ltd, a company specialising in construction and storage. The landowner currently utilises the land for company storage.

3.4 The application site is within an established industrial area and the proposal has been designed to best practice in terms of scale and environmental performance, ituses the latest Medium Combustion Plant Directive (MCPD) compliant lean burn gas engines. The facility as a whole is discretely sited with minimal environmental and visual impacts.

3.5 The proposed site has been chosen as it meets the location criteria required to ensure its sustainable operation. This includes its close proximity to an existing main Northern Power Distribution Grid electricity substation with the required capacity (to which it can be connected) and National Grid Gas Networks medium pressure gas network to drive the plant.

3.6 Sites which are suitable for this use and in such close proximity to suitable existing infrastructure are rare, thus restricting where these facilities can be located. Due to the proximity of this site to Grid infrastructure, minimal works are required for connection.

Outline Description

3.7 The proposal is for a low NO_X (250mg/metre^2) gas fuelled Short Term Operating Reserve (STOR) Electricity Generating Facility which an output of up to 20MW, consisting of 11 natural gas fuelled generators enclosed within steel containers and associated plant (refer to submitted plans and elevations).

3.8 The site will be bounded by a 4.5m timber acoustic fence. The proposal will be connected to the National Grid via a connection operated by Northern Power Distribution (NPD).

2.15 The facility will have a contract from National Grid for a minimum of 15 years which could be extended due to the nature of the energy gap requirements of being faced. Due to the short-term nature of the facility the containers will be temporary

structures and so no substantive excavation or groundworks will be required. Once the National Grid contract ceases, the facility can be decommissioned and returned to the landowner for future use.

Operation

3.9 At times where there is insufficient supply of electricity within the National Grid from conventional power stations to meet demand, the facility will generate electricity which will then feed back into the Grid. The facility may be called upon to release electricity within 2 minutes to the Grid in order to contribute to balancing the system.

3.10 STOR installations are flexible units once installed (they can be brought on line within 2 minutes), smaller, much quicker to build than a full power station (6 months as opposed to 5-10 years) and more economical than conventional large fossil fuel or nuclear power stations. Being distributed throughout the country, small scale and close to the point of use, they are unobtrusive and require minimum additional infrastructure such as pylons and sub-stations.

3.11 The proposed facility will have a capacity to generate up to 20MW. Historically, these facilities only operate for a few hundred hours, however due to the nature of the facility, our consultants have modelled a range of operation scenarios up to 2000 hours to fully assess the potential air quality and noise impacts. The generators are intended to offer additional power to the national grid during peak periods of demand.

3.12 This site is being put forward to National Grid under the Auction process, if successful the site is required under the contract to be available to operate at the contracted megawatt during 'Availability Windows' (see Appendix 1), these can change according the season.

3.13 Year 11 (2017/2018) Seasons run from 1st April 2017 - 1st April 2018 between the hours of 6am and 10pm. Year 12 (2018/2019) seasons run from 1st April 2018 – 1st

April 2019 between the hours of 6am to 10pm[1]. The detailed hours can be found at Appendix 1.

3.14 National Grid will release notices to providers during these periods to be ready to operate when actual demand is greater than forecast demand and/or unforeseen generation unavailability. **Therefore, whilst the facility may be 'on stand-by' to operate 24/7, National Grid will only request operation during the Availability Windows.** It is highly unlikely that facilities such as the one in question will operate outside these hours unless there is a rare national emergency of a complete or significant network failure.

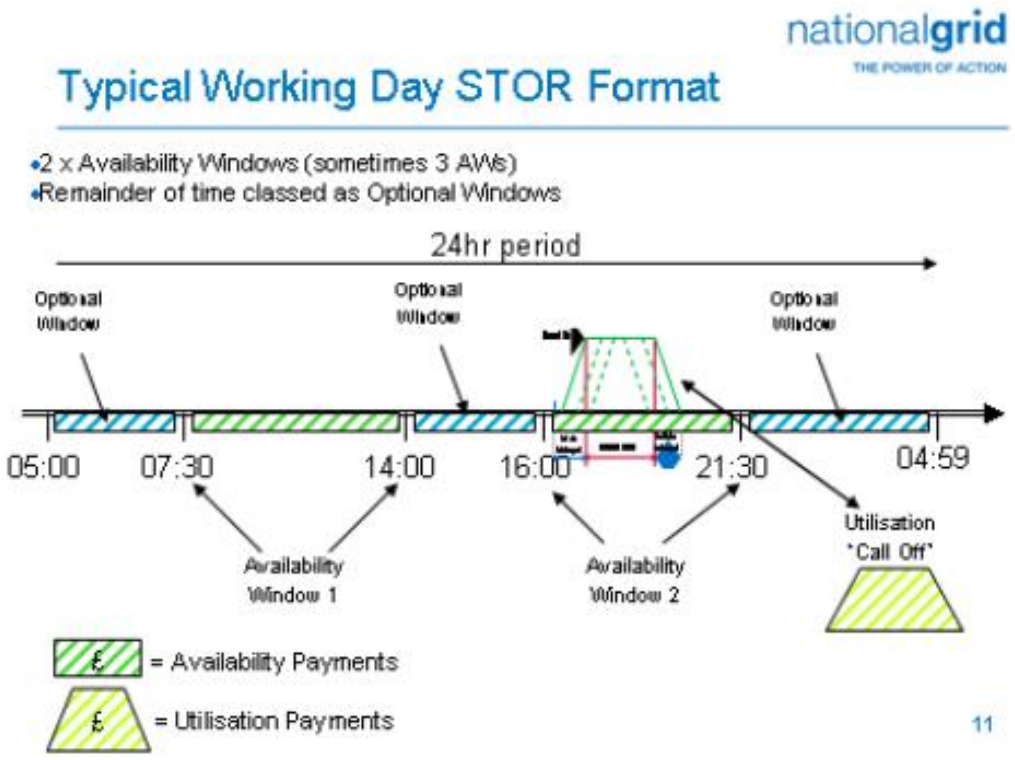


Figure 3 Availability Windows

3.15 In addition, the actual hours of operation are considered unlikely to meet the indicative hours noted at paragraph 2.14. whilst there is a rising trend in the use of

[1] STOR Market Information Report, National Grid, 24 March 2017

STOR power, recent use in the West Midlands (as show in the table below) is not even close to this.

3.16 Expected operation would in fact be limited to approximately 1-3 hours per day, typically operating between the peak demand hours of 4pm-7pm during the winter months of November to February.

Year	Total Yearly Operating Hours
2014	17
2015	28
2016	42.5

3.17 Back up reserve facilities are utilised with consideration of geographic location[2], for instance if Birmingham suffers a power shortage, facilities nearby will operate, where London suffers a shortage, facilities near to London will operate.

Access and Operational Requirements

3.18 The site will be accessed via Whaley Road utilising the existing access road. Site visits will not be more than 10-15 trips per year for emergency access or maintenance.

[2] Annual Market Report 14/15, National Grid

Flood Risk and Drainage

3.19 The site is below 1ha and as such an FRA is not required. The site is located in Flood Zone 1 and as thus is not in an area prone to flooding.

Ecology

3.20 The report has noted there are no significant onsite ecological constraints to the proposed development and no further surveys are required.

Security

3.21 The plant will be within a secure housing within bespoke containers and surrounded by 2.4m palisade fencing. A CCTV system will be operational covering the internal part of the site and boundary.

3.22 In the event of a leak or fire a shut off valve will operate to ensure that fuel supply is cut off to the main plant. An alarm will be fitted to a remote control facility to advise of such events.

Landscaping

3.23 The site does not benefit from any internal landscaping, however adjacent to the wider site boundary fence includes low level shrubbery which does not encroach on the site or proposal. Therefore, any existing landscaping will not be affected by the proposal.

Employment

3.24 The proposals will generate employment in the short term through the construction phase. Whilst the facility will be unmanned, there will be a network of maintenance personnel involved in regular visits to the site, and this development will secure their employment in the longer term.

4.0 LOCAL DEVELOPMENT PLAN AND MATERIAL CONSIDERATIONS

4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) state that determination of applications made under the Act must be made in accordance with the development plan, unless material considerations indicate otherwise.

Local Development Plan, Barnsley Metropolitan Borough Council Core Strategy

4.2 The Core Strategy for Barnsley Metropolitan Borough Council was adopted on 8 September 2011 and covers the period up to 2026. The following policies are of relevance to this application.

4.3 CSP 1 Climate Change; the strategy sets out to reduce the impact on climate change by reducing and mitigating the impact of growth on the environment, ensure communities are resilient to climate change, giving preference to development in sustainable locations and promote the use of sustainable drainage systems.

4.4 CSP 19 Protecting Existing Employment Land; redevelopment of employment land and buildings for non-employment uses will only take place where redevelopment will not result in a loss of jobs and there is still an adequate supply of employment land in the locality.

4.5 CSP 29 Design; this policy sets out criteria that development must adhere to such as be at a scale, character, layout and building style similar to surrounding areas. Be integrated, sustainable, make efficient use of resources, flexible to future needs and have no adverse impacts on the surrounding area.

4.6 CSP40 Pollution Control and Protection; this policy will not allow development which will negatively affect or cause a nuisance to the natural environment or people from noise, smell, dust, vibration or air pollution. Developers must take action to reduce the effects of possible pollution and provide mitigation measures.

National Planning Policy Framework (the Framework)

4.7 The overarching principle of the Framework is a presumption in favour of sustainable development. For decision making this means, where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. (Paragraph 14). The Core Strategy is not out-of-date, however, it is silent with respect to this form of development with only very general policies being considered. Therefore, on this basis the Framework is a material consideration and should be given some weight when considering this development.

4.8 Paragraph 17 sets out the core planning principles which under-pin plan-making and decision taking of relevance to this application, it states that planning should "*proactively drive and support sustainable economic development*" in order to meet the country's development needs, including infrastructure. The policy expects planning to "*support the transition to a low carbon future in a changing climate, take full account of flood risk… and encourage the reuse of existing resources…and the use of renewable resources".*

4.9 Section 10 of the Framework supports the delivery of renewable and low carbon energy and associated infrastructure, minimising vulnerability and providing resilience is central to the economic, social and environmental dimensions of sustainable development (paragraph 93).

4.10 The Framework seeks to encourage business investment, '*planning policies should recognise and seek to address potential barriers to investment, including a poor environment or any lack of infrastructure, services or housing.'* (paragraph 21). The policy requires Local Authorities to support existing business sectors and identify new and emerging sectors likely to locate in their area. '*Policies should be flexible enough to accommodate needs not anticipated in the plan to allow a rapid response to changes in economic circumstances… and; identify areas for economic regeneration, infrastructure provision and environmental enhancement'.*

4.11 Paragraph 22 of the Framework discourages Local Authorities from long-term protection of sites allocated for employment use where there is no reasonable

prospect of a site being used for that purpose. Allocations should be regularly reviewed. '*Where there is no reasonable prospect for the site being used for allocated employment use, applications for alternative uses should be treated on their merits, having regard to market signals and the relative need for different land uses to support sustainable local communities'.*

4.12 Paragraph 98 goes on to explain when determining applications, local authorities *"should not require applicants for energy development to demonstrate the overall need for renewable or low carbon energy and also recognise that small scale projects provide a valuable contribution to cutting greenhouse gas emissions."*

4.13 Paragraph 120 goes on to explain that when decision making, local authorities when considering if the development is appropriate for its location should take into account the "*effects (including cumulative effects) of pollution on health, the natural environment, or general amenity and the potential sensitivity of the area".*

4.14 Paragraph 122 wants Local authorities to *"focus on whether the development itself is an acceptable use of the land, and the impact of the use, rather than the control of processes or emissions themselves where these are subject to approval under pollution control regimes. Local authorities should assume that these regimes will operate effectively".*

4.15 Overall, the proposal is in alignment with the Framework and it is considered that the development is an acceptable use of the land, keeping within the parameters of industrial use as per Paragraph 122 of the Framework.

4.16 Though the energy generated may not be from renewable sources such as wind or solar, the proposal supports the transition to a low carbon future in its role as a fast frequency response balancing reserve and helps the transition away from large fossil fuel based energy generation. As a result, it is in accordance with the principles of the Framework.

National Policy Statements

4.17 Paragraph 1.2.3 of National Policy Statement for Electricity Networks EN5 explains the policy statement in conjunction with EN1 may be helpful to Local Authorities in England when deciding applications under the Town and Country Planning Act 1990 (as amended) and is likely to be considered a material consideration.

4.18 "*Under existing planning law, decisions by LPAs on planning applications must be taken in accordance with the development plan unless material considerations indicate otherwise. In cases where development plans have not yet been updated to take account of a particular NPS, the NPS is likely to be a material consideration which the LPA (and the Secretary of State on appeal or call-in) will have to take into account when determining planning applications. Whether or not the NPS is a material consideration in this or any other circumstance and the weight to be applied to it by the decision-maker will have to be determined on a case by case basis." (Letter to Chief Planning Officers, Nov 2009[3])*

4.19 The Overarching National Policy Statement for Energy EN1 notes it is critical that the UK continues to have secure and reliable sources of electricity as we make the transition to a low carbon economy.

4.20 Paragraph 2.2.20 highlights the need for energy storage "*we need sufficient electricity capacity (including a greater proportion of low carbon generation) to meet demand at all times".*

4.21 Paragraph 3.7.2 of EN1 goes on to say "*it is likely that demand for electricity will increase significantly over the coming decades. Factors contributing to such growth include the development of new housing and business premises (the number of households in England is projected to grow to 27.8 million by 2031) and the increased use of electricity in domestic and industrial heat and transport. Lack of sufficiently robust electricity networks can cause, or contribute to, large scale*

[3] https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7989/091109-Letter_to_Chief_Planning_Officers-_National_Policy_Statements.pdf

interruptions. Existing transmission and distribution networks will have to evolve and adapt in various ways to handle increases in demand."

4.22 Paragraph 3.3.2 and 3.3.3 highlight the Government "*needs to ensure sufficient generating electricity capacity is available to meet maximum peak demand, with a safety margin or space capacity to accommodate unexpectedly high demand and to mitigate risks such as unexpected plant closures and extreme weather events… the larger the difference between available capacity and demand, the more resilient the system… and consequently the lower the risk of supply interruption*".

4.23 Though these statements are aligned towards Nationally Significant Infrastructure Projects, they highlight the need for energy infrastructure across the board to ensure future security and reliability of energy networks.

5.0 EMPLOYMENT LAND POLICY AND PLANNING BALANCE

5.1 The only policy in the plan that directly relates to the proposal is CSP19, we address this policy and the material considerations that outweigh the policy in this section.

CSP19 Protecting Employment Land

Existing employment land, or land last used for employment purposes will be retained in order to safeguard existing or potential jobs. The redevelopment of employment land and buildings for non-employment uses will only take place if:

- redevelopment would not result in a loss of existing jobs or employment potential; and
- there will still be an adequate supply of employment land in the locality

If the above criteria can be satisfied, then redevelopment will be allowed where it can be demonstrated that: the buildings or land cannot satisfactorily support continued employment use.

5.2 The application site is protected by the above policy within the Core Strategy to ensure existing employment land is retained. The proposal, though industrial in nature does not fall within any use class so is considered to be '*Sui Generis'.* The above policy considers uses not for employment to be incompatible. However, no provision has been made for industrial or business activity which falls within '*Sui Generis'* in the adopted Development Plan. The industrial nature of the proposal means it is not able to be located outside industrial areas, as it would be considered inappropriate.

5.3 The application site covers a small proportion of the wider area measuring only 0.16ha, the remainder of the application area (0.18ha) is used for access through the property to the adopted highway, therefore, it does not reduce the supply of employment land in the locality. The current operation of Joe Pole Ltd will not be affected nor will employees be lost as a direct result of the proposal. Moreover, income gained through the lease of land would ensure the future viability of the current business.

5.4 Though the facility is operated remotely, it does require and facilitate the employment of between 1 and 5 employees in the capacity of maintaining and monitoring the facility.

5.5 The proposal does not result in the loss of employment from the current business in operation and timescales for potential employment development of this site is uncertain while it is in the control of the end user. The Barnsley Employment Land Review (December 2016) [4] recognises this at paragraph 6.13. Should this proposal be refused, the site is unlikely to come forward for activities other than commercial storage in any case.

5.6 Additionally, the review notes that land already used for employment forms part of the employment land stock and should be safeguarded from *'non-economic uses'*. Infrastructure is considered to be economic development as it provides a service which is paid for by consumers, providers and operators. Indeed, paragraph 6.6 discusses land in 'economic development use' is considered appropriate for 'continued employment use'.

5.7 The Framework highlights that significant weight should be placed on the need to support economic growth through the planning system and *investment in business should not be over-burdened by the combined requirements of planning policy expectations.* As noted previously, under paragraphs 21 and 22 of the Framework, applications for alternative uses should be treated on their merits, having regard to market signals. The Framework also requires Local Authorities to plan for infrastructure provision and plan policies should be flexible to accommodate for needs not anticipated in the plan.

5.8 The Barnsley Core Strategy is effectively silent on infrastructure proposals and does not make any provision for strategic infrastructure. Therefore, other material considerations such as the national need (addressed in chapter 2), the Framework and National Policy Statements should be given significant weight in light of this. Though the facility does not technically fall within B1, B2 or B8 use classes for

[4] Barnsley Employment Land Review, Dec 2016

employment, it falls within the umbrella of General Industrial uses and is reflective of the industrial nature of the area.

5.9 As explained previously, the facility will assist in bridging the gap between energy supply and demand during peak hours and facilities are chosen on a geographical basis. As such, the facility will support the immediate industrial estate and the wider area of Stairfoot. As traditional power stations in the area are decommissioned, the area is at risk of power outages when demand peaks, should outages occur, industrial estates such as South Yorkshire Industrial Estate will be forced cease operations. The 'Availability Windows' demonstrate there is likely to be more demand during Working Days and the day to day operations of businesses could be affected during these times. This would have significant financial implications for current occupiers and businesses and would influence investment decision by new occupiers. This facility will ensure and protect the continued operation of commercial enterprises with high energy demand. This is considered to be a material planning consideration which should be given significant weight during determination.

5.10 This site is under a lease agreement with the landowner for a period of 20 years and will operate under a 15-year contract with National Grid, whilst this is not necessarily a short-term operation, it is ***not permanent*** and will be decommissioned at the end of the contract, therefore, releasing the land back to the landowner for future use. The proposal would also provide a capital injection under the lease agreement ensuring the future viability of Joe Pole Storage Ltd.

5.11 Due to the nature of the proposal, it cannot be located in residential areas or open countryside due to the potential impacts on the immediate area surrounding the proposal. As such, there are very few appropriate sites where this type of development can be located.

5.12 Finally, the capital receipt from this proposal will be used to support the current occupier's business. There is still an adequate supply of employment land in the locality, the proposal does not command the use of large swathes of land which would significantly reduce employment land supply. Taking into account all of the above, the proposal does not conflict with Policy CSP19 and national need, non-

permanence and locational criteria are material considerations which should be given due weight during determination.

6.0 CONCLUSIONS

6.1 This proposal meets a **national need**, providing energy security in times of high demand and low supply. It supports the transition to a low-carbon future from traditional fuel sources, such as coal, to low-carbon sources such as wind-power.

6.2 The process for new low-carbon nationally significant infrastructure projects can be lengthy from inception to operation, hence there is a national duty by the public and private sectors to work collaboratively to ensure that there is a constant provision of energy. The Government recognises the importance of these sources of power generation in providing reliable energy supplies that can respond flexibly to meet changes in demand. They are now seen as a vital part of the UK's energy supply 'mix' in the transition to low carbon economy.

6.3 There is a lack of suitable premises for this type of development and the local planning policy does not identify sites able to accommodate infrastructure development nor does it consider the need for local or national infrastructure projects. As the plan is effectively silent with regards to this, the proposal must be considered on its own merits and other material considerations must be given due weight.

6.4 It is acknowledged that the proposal does not comfortably sit within the use classes B1- B8 and there is a degree of conflict with Core Strategy policy CSP19, however, it is industrial in nature and is a form of economic development. Further, the income generation for the landowner through the lease agreement can be reinvested in the landowner's current business.

6.5 Though the facility is classed as *Sui Generis*, it is considered that the most appropriate locations are industrial sites as these have the relevant connections to the grid and suitable power whilst also having fewer sensitive receptors, such as residential neighbours.

6.6 It should be noted that the proposal is temporary in nature and once decommissioned the site will be returned to the landowner for future use for other employment and/or industrial uses, subject to planning.

6.7 The Framework requires Local Authorities to take a flexible approach to new business, to accommodate needs not anticipated in the plan and to allow for a rapid response to changes in economic circumstances. As the relevant Development Plans are effectively silent, proposals must be granted unless any adverse impacts of doing so would *significantly and demonstrably outweigh the benefits.* In this case, it is considered that the National Policy Statements, the Capacity Market Regulations and Rules are material considerations of significant weight.

6.8 Having reviewed the technical evidence, it is clear the application site is unconstrained from an ecological, flood risk, air quality and noise perspective (due to infrequent operation). The facility will only operate during peak demand hours and will not operate outside the hours of 11pm – 6am unless there is a system failure or national emergency. The site is located sufficiently away from sensitive residential receptors to cause any harm.

6.9 Relatively unconstrained sites which are suitable for this type of facility are rare, often because of a lack of existing infrastructure which allows easy connection to the grid.

6.10 The proposal will create jobs and secure longer term employment.

6.11 It is therefore respectfully requested that the Council grant planning permission without delay.

APPENDICES

APPENDIX 1 – NATIONAL GRID 'AVAILABILITY WINDOWS'

Year 11 Seasons 2017/2018							
		Working Days		Non-Working Days		Indicative Hours	
Season	**Dates**	**Start Time**	**End Time**	**Start Time**	**End Time**	**WD**	**NWD**
1	05:00 on Saturday 1st April 2017 - 05:00 on Monday 24th April 2017	0600 1900	1300 2130	1000 1930	1400 2130	105.00 37.50	32 16
2	05:00 on Monday 24th April 2017 - 05:00 on Monday 21st August 2017	0630 1600 1930	1200 1800 2200	1030 1930 -	1330 2200 -	750.00 200.00 250.00	57 47.50 -
3	05:00 on Monday 21st August 2017 - 05:00 on Monday 25th September 2017	0630 1600	1300 2100	1030 1930	1230 2130	188.50 145	12 12
4	05:00 on Monday 25th September 2017 - 05:00 on Monday 30th October 2017	0600 1700	1300 2030	1030 1730	1300 2000	210 105	12.50 12.50
5	05:00 on Monday 30th October 2017 - 05:00 on Monday 29th January 2018	0600 1600	1300 2030	1030 1600	1330 1930	545 337.50	48 56
6	05:00 on Monday 29th January 2018 - 05:00 on Sunday 1st April 2018	0600 1630	1300 2030	1030 1630	1300 2000	378 216	20 28
Year 12 Seasons 2018/2019							
		Working Days		**Non-Working Days**		**Indicative Hours**	
Season	**Dates**	**Start Time**	**End Time**	**Start Time**	**End Time**	**WD**	**NWD**
1	05:00 on Saturday 1st April 2018 - 05:00 on Monday 30th April 2018	0600 1900	1300 2130	1000 1930	1400 2130	161.00 57.50	24.00 12.00
2	05:00 on Monday 30th April 2018 - 05:00 on Monday 20th August 2018	0630 1600 1930	1200 1800 2200	1030 1930 -	1330 2200 -	705.00 188.00 235.00	54.00 45.00 -
3	05:00 on Monday 20th August 2018 - 05:00 on Monday 20th September 2018	0630 1600	1300 2100	1030 1930	1230 2130	188.50 145.00	12.00 12.00
4	05:00 on Monday 20th September 2018 - 05:00 on Monday 29th October 2018	0600 1700	1300 2030	1030 1730	1300 2000	210.00 105.00	12.50 12.50
5	05:00 on Monday 29th October 2018- 05:00 on Monday 28th January 2019	0600 1600	1300 2030	1030 1600	1330 1930	525.00 337.50	48.00 56.00
6	05:00 on Monday 28th January 2019 - 05:00 on Sunday 1st April 2019	0600 1630	1300 2030	1030 1630	1300 2000	378.00 216.00	22.50 31.50