LAND OFF TOFTS LANE, HUNSHELF, SHEFFIELD S36 8YR

Proposed Battery Energy Storage System and associated works

PLANNING STATEMENT

March 2023

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Appendices

/1 INTRODUCTION

1.1. PWA Planning is retained by Harmony (HS) JV Limited ('the applicant') to submit a planning application for the development of an energy storage facility ('the proposed development') on land off Tofts Lane, Hunshelf, Sheffield ('the application site').

1.2. Harmony Energy specialise in developing and operating wind, solar and utility-scale battery energy storage projects. Founded more than ten years ago, Harmony Energy have a track record of delivering projects working closely with landowners from the outset, to ensure financial and environmental benefits are maximised with attractive, long-term income opportunities, bearing all development costs and project responsibility.

1.3. This planning application is made to Barnsley Metropolitan Borough Council ('the Local Planning Authority') as a full planning application and relates to the red edge application site boundary defined on the Location Plan submitted in support of this application.

1.4. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise. This Planning Statement will demonstrate that the proposals accord with the provisions of the relevant policies of the Development Plan, and moreover that there are other significant material considerations which indicate that planning permission ought to be granted. In addition, the statement will seek to demonstrate that there are no technical reasons which could hinder the grant of planning permission.

1.5. This Planning Statement, alongside a review of the site history and relevant policies, provides a description of the proposed development together with an appraisal of the planning merits of the scheme as a whole.

1.6. This statement should be read in conjunction with the submitted application package, which includes the following documents:

- 1 APP form, relevant certificates and notices;
- Biodiversity Metric Report January 2023
- Construction Traffic Management Plan March 2023

- Flood Risk and Drainage Assessment October 2022
- Drawn Information:
  - HS_LP_RevG - Location Plan
  - HS__ESP_RevF – Existing Site Plan
  - HS_PPP_RevE – Proposed Parameters Plan
  - HS_PSP_RevM – Proposed Site Plan (Construction)
  - HS_PSP_RevM – Proposed Site Plan (Operational)
  - HS_SE_RevD – Site Elevations
  - UG_1636_LAN_GA_DRW_01 Rev. P07
- Landscape and Visual Appraisal March 2023
- Noise Impact Assessment March 2023
- Preliminary Ecological Appraisal June 2022
- Transport Statement March 2023

/2 SITE DESCRIPTION

2.1. The application site comprises of an undeveloped area of agricultural land to the south of Tofts Lane, adjacent to an existing substation which lies to the south east of the site. Access to the site is taken to the north west corner via the existing agricultural access which connects to Tofts Lane. The area of the site is approximately 0.48ha.

2.2. The site is adjoined by further agricultural land to the north, west and south boundaries. Views in this area are dominated by the existing infrastructure associated with the substation, including the associated network of pylons and overhead cables. The settlement of Stockbridge lies approximately 1km to the south.

2.3. An aerial image of the site is provided in Figure 1 below, whist the Location Plan provides the application site boundary.

Figure 1: Application site and its surroundings (source: Google Earth, not to scale).

2.4. The nearest residential dwelling is Carr Head Farm located over 400m to the southwest of the site. The site lies within Flood Zone 1 where whereby the risks of both tidal and fluvial flooding are at their lowest and is not in or within proximity to any heritage assets. There are no ecological or landscape designations associated with the site.

Site Selection

2.5. To provide grid balancing services, energy storage systems require a technically and financially viable connection to the HV electricity network. In addition, there must be capacity in the existing DNO (Hunshelf sub-station in this instance) infrastructure to accommodate the flow of electricity in both directions.

2.6. This site provides existing electricity infrastructure immediately adjacent to the application site. The DNO has studied their local distribution network and confirmed they can accommodate the proposed facility, making the site both technically and financially feasible.

2.7. As noted above, the site is not subject to any landscape, ecological or cultural heritage designations, and the site is within Flood Zone 1 where the risk of flooding is at its lowest.

Planning History

2.8. A search of Barnsley Metropolitan Borough Council website has been undertaken with a view to understanding the planning history in the immediate surrounding area.

2.9. A screening request (ref: 2022/ENQ/00272) was submitted at the site on 22nd June 2022 further to discussions with the Council to establish whether an EIA is required for this proposal. This decision for the screening request was issued on 27th July 2022 which confirmed the submission of an EIA is not required.

2.10. A full planning application (application reference 2017/0624) was submitted in May 2017 and subsequently approved in September 2017 for the '*Formation of a battery energy storage facility with associated transformer cabling security fencing and CCTV Poles*.' Whilst the permission was not implemented, this established the principle of a battery energy storage facility in this location. The Committee Report for the application is included at full in Appendix A.

2.11. This development was proposed to be sited on a directly comparable footprint to the development proposed here. The scheme related to 26 battery storage units and associated infrastructure. The principle of development was deemed acceptable, with very special circumstances demonstrated which outweighed any harm to the Green Belt. The harm to the Green Belt was deemed as partially mitigated by the location of the site within the confines of the existing substation and the site topography. Clear benefits were identified from the scheme, notably supporting clean energy generation. The site was also found to

be the only suitable and deliverable site in the Borough for the battery storage use proposed. The proposals were deemed acceptable from a visual amenity perspective and no highways issues were identified.

2.12. Given the scheme presented in this application is directly comparable to the 2017 approval in terms of the type and form of development, the proposals are considered to represent appropriate development within the Green Belt. This statement sets out how very special circumstances exist for the proposed development, within Chapter 6 of this statement.

2.13. Below evidences other battery storages within the borough:

- Ref. 2016/0296. Erection of enclosed battery storage at Land west of Hopewell Street, Stairfoot, Barnsley. Approved.
- Ref. 2017/0117. Erection of Battery Storage Facility at Land West of Hopewell Street, Stairfoot, Barnsley (amended location). Approved.
- Ref. 2017/0957. Erection of building to house battery storage facility, Land North of Twibell Street, Barnsley, S71 1JE. Approved.

/3 PROPOSED DEVELOPMENT

3.1. The proposed development comprises of a battery energy storage system (BESS) contained within a fenced compound and surrounded by landscaping. The layout of the proposed development and detailed layout of the proposed equipment is shown in the Proposed Parameters Plan (ref. no. HS_PPP_Rev E) and the Proposed Site Plan (ref. no. HS_PSP_Rev M Operational).

3.2. Submitted in addition to the above plans is a Proposed Parameters Plan (HS_PPP_Rev. E) which seeks to allow some flexibility in the specification and the layout of the equipment within the compound. The Parameters Plan specifies that across the majority of the site, equipment heights would be up to 3m. This covers the battery containers, transformers, storage and office containers and some ancillary equipment. Other equipment on site associated with the development includes a switchgear room, which would have a height of up to 4m, which applies only to one area of the plan, and a transformer on the site adjacent to the substation; this will be up to 6m in height.

3.3. The submitted layout is based on Tesla equipment for illustrative and consenting purposes. It is however requested that the final layout and specification of equipment is agreed by condition since at this stage it is not certain who the battery supplier will be. The submitted parameters plan works on maximum heights so no equipment proposed on this site would exceed this.

3.4. The final equipment to be placed on site will be decided post-consent following a competitive tendering process, which is the norm for large scale renewable energy projects such as this. It should also be noted that this type of technology is constantly being innovated and made more efficient and therefore flexibility allows for change in advancements between consent and build. PWA Planning would be happy to discuss this issue in more detail once the application is underway and provide an example condition in this respect.

3.5. The equipment proposed comprises of 16no. high efficiency BESS units housed within individual containers and 8no. transformer units, all at a height of up to 3m. A laydown area is indicated close to the entrance of the compound and adjacent will have a storage and

office container both at a height of up to 3m. To the rear (south west) of the laydown area there will be a customer control room, customer switchgear room and an Aux Transformer.

3.6. The above equipment will sit on concrete plinths within a fenced compound. The remainder of the compound surface will be finished in type 1 aggregate, with a harder sub-base to be used for the short section of access track within the site. The compound will be surrounded by a 2.4m palisade fence, within the perimeter of the site compound is proposed 4m high CCTV and thermal imaging poles to ensure site security.

3.7. Access to the site would be taken via a Tofts Lane and would access via the A6101. There is an existing gate into this site, but this will be moved centrally with the stone wall rebuilt accordingly. A Proposed Construction Plan (ref. no. HS_PSP_Rev M) has been provided to indicate a hardstanding construction laydown area on site where any required parking and vehicle movement on site will occur during construction.

3.8. A Proposed Operational Plan (ref. no. HS_PSP_Rev M) has also been provided to indicate a proposed SUDS drainage pond in the location of the construction laydown area. This will not only provide a solution to surface water drainage but also allow for a level of landscaping and biodiversity mitigation on site. This provides the final layout that will be completed on site.

3.9. A section of field to the other side of the substation is proposed for enhancement as a wildflower meadow. Whilst not necessarily landscaping for the site, this is proposed to assist with off-site mitigation and biodiversity net gain.

3.10. The Site lies within wider tracts of land to the north of Stocksbridge designated as Green Belt and there is no landscape, ecological or heritage designations which directly cover the Site. The Site is currently part of a larger pastoral field parcel with limited and adjacent to the existing Hunshelf electricity sub-station to the east of the Site. The Site is bound pastoral farmland to the west and south and Tofts Lane to the north. There are elements of energy infrastructure, including the sub-station, pylons and wind turbines in the immediate and wider setting of the Site.

3.11. Increasingly, developers of large-scale generation and storage schemes seeking to connect to the electricity grid are being given connection timescales of 2028 and well beyond. Swathes of the country are already affected by capacity constraints on the transmission

network and the delays associated with National Grid's planned reinforcement works risk the UK not meeting the Government's 2035 electricity system decarbonisation target.

3.12. By way of background, Harmony Energy Ltd (HEL) are a company who operate a 'grid-led' approach which focuses on securing a grid connection in the first instance, prior to submitting a planning application. Once a grid connection is secured, a connection date will be issued which can be immediate or some several years away.

3.13. Whilst we note that a standard planning permission would usually stipulate that a permission be implemented no later than three years following the consent, we consider that given the varying and potentially longer stop dates for connection that longer planning permissions would be appropriate in this instance.

3.14. We would, therefore, request a longer planning permission be included in any future approval allowing for the development to start on or before seven years from the date of permission. An extended planning permission will provide assurance that the scheme can and will be delivered at the appropriate time, working alongside the Grid to ensure that a connection is possible. The applicant welcomes the LPA's views on these timescales.

/4 TECHNICAL CONSIDERATIONS

4.1. It is considered that the proposed development can be implemented without significant adverse impacts arising from any site constraints or environmental issues. A number of technical assessments have been undertaken which are summarised below and which should be read in conjunction with the full reports as referenced.

Ecology

4.2. A Preliminary Ecological Appraisal has been undertaken by E3P on behalf of the applicant and the results of which are presented within the Ecological Assessment provided with this application.

4.3. The site is located within the impact risk zone of Spring Meadows, Alderman's Head and Cow Croft Meadows Site of Special Scientific Interest (SSSI), Dark Peak SSSI, which forms part of Peak District Moors (South Pennine Moors Phase 1) Special Protection Area (SPA) and Special Area of Conservation (SAC), and Pye Flatts Meadows SSSI. No impacts on designated sites are anticipated as a result of development, based on their distance from the site and the small scale of the development. Furthermore, consultation with MAGIC identified that the proposed development does not meet the requirements that would justify further consultation with Natural England for the development to proceed.

4.4. Two Local Wildlife Sites (LWSs) are located within the 1 km search area. It is deemed highly unlikely that the development will have an impact on the LWSs due to the small size of the site and the low impact of the development.

4.5. The site was found to comprise an improved grassland field, three drystone walls and a poor semi-improved grassland road verge. Potential site constraints include parts of the wall being suitable for nesting birds and common amphibians, field horsetail on the roadside verge and badger, hedgehog and brown hare anticipated within the surrounding area.

4.6. Given the findings of the Ecological Appraisal, it is considered that there would no unacceptable ecological impacts as a result of the proposed development, with no further surveys recommended in support of the planning application. Several mitigation recommendations have been made within the report.

4.7. The biodiversity metric results show a loss of 0.65 habitat units due to the development proposal and a -72.68% loss in habitat units on-site as a result of development. The development does however propose improvement and off-site habitat enhancement of a field to the east of the substation which minimises the above losses to a loss of only 0.16 habitat units which equates to a -18.08% loss in habitat units as a result of development.

4.8. We have sought to achieve as close to a no net loss as possible with this site given the limitations on the land available and the nature of the proposed development. As such, given the overall benefits of the scheme when considering the planning balance, we consider the proposed landscaping on site, and the additional off site mitigation, to be sufficient in this case.

Landscape and Visual Impact

4.9. A Landscape and Visual Appraisal (LVA) has been prepared by Urban Green to assess the impact of the proposals on landscape character and visual amenity.

4.10. The Site lies within wider tracts of land to the north of Stocksbridge designated as Green Belt. There are no landscape, ecological or heritage designations which directly cover the Site. Furthermore, there are elements of energy infrastructure, including the sub-station, pylons and wind turbines in the immediate and wider setting of the Site.

4.11. The proposed development has been laid out to largely retain the existing landscape features including the drystone boundary walls and the most sensitive parts of the Site. In response to the sensitivity of the southern areas of the Site, the layout has developed to locate the built form within the northern portions of the Site in order to reduce landscape and visual effects within this sensitive area.

4.12. Minor adverse effects are anticipated in relation to the loss of the small section of boundary wall within the Site. Minor to Negligible adverse effects are anticipated to landscape character. These effects will be borne in an area that has an existing relationship with the adjacent energy infrastructure surrounding the Site. The effects on the Green Belt designation are anticipated to be Negligible.

4.13. As a result of the local landform the Site is largely visually contained and visual effects are anticipated to range from Moderate for receptors using the Footpath to the north of the Site to Minor adverse and Negligible for a limited number of receptors in close proximity to the

Site. In summary, the proposed development will sit within the existing landscape character without causing significant harm.

Highways and Transport

4.14. A Transport Statement (TS) (ref. LTP/22/5084) and Construction Traffic Management Plan (CTMP) are submitted in support of this planning application. These have been prepared to assess the impact of the proposed development on the local and wider highway network, and to assess the safety and suitability of site access arrangements.

4.15. Vehicular access to the site is to be provided via a new access from Tofts Lane in the approximate location of the previously approved access (ref: 2017/0624). This will be utilised during the construction, installation, and maintenance periods, which is deemed to be acceptable. The TS also confirms that there are no pre-existing road safety issues pertinent to the development of the site, and the proposals will not adversely affect the safety of other road users.

4.16. The development also proposes to provide vehicle parking for site workers during all stages of construction and operation on-site with no vehicles allowed to park or wait on the adjoining road network during any stage of the development.

4.17. Swept Path Analysis (SPA) has been undertaken to establish whether an Abnormal Indivisible Load Vehicle (AILV) and standard articulated Heavy Commercial Vehicle (HCV) can adequately navigate Hewitts Avenue, the existing access junction, and internal access road. The results show that an AILV and standard articulated HCV can adequately access/egress the site.

4.18. The TS illustrates the likely trip generation associated with the BESS during both the construction and installation period, as well as once operational. The TS concludes that the level of trip generation will be insignificant, with the overall impacts of the development determined to not have a detrimental impact in terms of both road safety and traffic impact, with reference to the local highway network.

4.19. It is considered that the projected operational vehicle trip generation associated with the proposed development does not represent a significant amount of movement, with a low number of daily/peak hour movements associated with construction. The proposed

development should therefore only have a negligible impact on the operation of the local highway network. In order to ensure minimal impact, the recommended measures during construction will be adhered to by the applicant and can be ensured through appropriate conditions.

4.20. Therefore, as the impact of the proposals is not expected to be severe, the proposals are considered to be in accordance with the NPPF. The TS concludes that the proposed development would not be expected to have a detrimental impact in terms of road safety and traffic impact.

Flood Risk and Drainage

4.21. A Flood Risk and Drainage Assessment Report has been completed by Gondolin Land and Water (Ref. GON.0070.0040) on behalf of the applicant which identified any potential flood risk sources. In addition, a drainage strategy for the proposed site surface water drainage has been included within the Report.

4.22. The Flood Risk assessment confirms that the site is overall of 'low risk' and therefore no bespoke flood mitigation measures are required. The report also assesses the potential increase in surface water runoff and subsequently proposes a surface water management strategy to manage this that is in accordance with the sustainable drainage principles.

4.23. Overall, it is considered that there is no impediment to the development proposals being granted planning permission on the grounds of flood risk and drainage provision.

Noise

4.24. A Noise Assessment has been submitted in support of this application, which assessed the acoustic impact of the proposed development in relation to noise sensitive receptors in close proximity to the site.

4.25. The assessment has shown the rating level will fall well below the lowest measured background sound level and result in suitably low internal noise levels within the closest dwellings. This is a positive indication of no adverse impact. As such, no mitigation measures are required.

4.26. As such, this assessment provides the necessary information to confirm that there would be no adverse noise impact.

/5 PLANNING POLICY CONTEXT

5.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that 'If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.' These can include local circumstances, previous decisions and government guidance as set out in the National Planning Policy Framework (the Framework) (2021).

5.2. The development plan for the Barnsley Metropolitan Borough Council comprises the Barnsley Local Plan adopted in January 2019. Other material considerations include the NPPF, NPPG and any relevant local supplementary planning documents and guidance.

5.3. As can be seen from the extract of the Local Plan Proposals Map provided in Figure 2, this site is designated within the Green Belt.

Figure 2: Extract of the Harrogate District policies map: designated-rural areas.

Barnsley Local Plan (2019)

5.4. The following policies of the Local Plan are considered relevant to the proposals:

- Policy SD1 – Presumption in favour of Sustainable Development
- Policy GD1 – General Development

- Policy E6 – Rural Economy
- Policy T4 – New Development and Transport Safety
- Policy D1 – High Quality Design and Place Making
- Policy LC1 – Landscape Character
- Policy BIO1 – Biodiversity and Geodiversity
- Policy GB1 – Protection of Green Belt
- Policy CC1 – Climate Change
- Policy CC2 – Sustainable Design and Construction
- Policy CC3 – Flood Risk
- Policy CC4 – Sustainable Drainage Systems
- Policy RE1 – Low Carbon and Renewable Energy

5.5. Policy SD1 – Presumption in favour of Sustainable Development states the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. We will work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

5.6. Policy GD1 – General Development sets out a range of general principles developments should accord with. These include being appropriate in terms of residential amenity, compatible with neighbouring land uses, include appropriate landscaping, have adequate access, appropriate drainage and no adverse impact on the environment.

5.7. Policy E6 – Rural Economy encourages a viable rural economy, including the sustainable diversification and development of the rural economy. Proposals must not have a harmful impact on the countryside, biodiversity, Green Belt, landscape or local character of the area.

5.8. Policy T4 – New Development and Transport Safety states new developments will be expected to be designed and built to provide all transport users within and surrounding the development with safe, secure and convenient access and movement.

5.9. Policy D1 – High Quality Design and Place Making expects proposals to be of a high-quality design and respect local character and landscapes. Proposals are also expected to include quality landscaping schemes.

5.10. Policy LC1 – Landscape Character states development will be expected to retain and enhance the character and distinctiveness of the individual Landscape Character area in which it is located.

5.11. Policy BIO1 – Biodiversity and Geodiversity seeks to conserve and enhance the biodiversity and geological features of the borough. This includes protecting and improving habitats, maximising biodiversity opportunities and encouraging biodiversity enhancements.

5.12. Policy GB1 – Protection of Green Belt states Green Belt will be protected from inappropriate development in accordance with national planning policy.

5.13. Policy CC1 – Climate Change seeks to reduce the causes of and adapt to the future impacts of climate change by:

- *Giving preference to development of previously developed land in sustainable locations;*
- *Promoting the reduction of greenhouse gas emissions through sustainable design and construction techniques;*
- *Locating and designing development to reduce the risk of flooding; Promoting the use of Sustainable Drainage Systems (SuDS);*
- *Promoting and supporting the delivery of renewable and low carbon energy; and*
- *Promoting investment in Green Infrastructure to promote and encourage biodiversity gain.*

5.14. Policy CC2 – Sustainable Design and Construction states development will be expected to minimise resource and energy consumption through the inclusion of sustainable design and construction features, where this is technically feasible and viable.

5.15. Policy CC3 – Flood Risk aims to reduce the impact of flooding by not permitting new development where it would be at an unacceptable risk of flooding from any sources of flooding, or would give rise to flooding elsewhere.

5.16. Policy CC4 – Sustainable Drainage Systems states all major development will be expected to use Sustainable Drainage Systems (SuDS) to manage surface water drainage, unless it can be demonstrated that all types of SuDS are inappropriate.

5.17. Policy RE1 – Low Carbon and Renewable Energy states development that produces renewable energy will be allowed as long as there is no material harm upon:

- *The character of the landscape and appearance of the area;*
- *Living conditions;*
- *Biodiversity, Geodiversity and water quality;*
- *Heritage assets, their settings and cultural features and areas;*
- *Key views of, from or to scenic landmarks or landscape features;*
- *Highway safety, or Infrastructure including radar.*

5.18. In assessing effect, the Council will consider appropriate mitigation which could reduce harm to an acceptable level. Proposals will be expected to include information regarding their efficiency. Proposals must be accompanied by information that shows how the local environment will be protected, and that the site will be restored when production ends.

Material Considerations

National Planning Policy Framework (NPPF) 2021

5.19. The NPPF sets out the Government's planning polices for England and how these should be applied and is a material consideration in planning decisions as per Paragraph 2 of the Framework and Section 38(6) of the Planning and Compulsory Purchase Act 2004.

5.20. Paragraph 11 of the NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development and that a presumption in favour of sustainable development is at the heart of the NPPF. For decision taking this means:

- Approving development proposals that accord with the development plan without delay; and

- Where the development plan is absent, silent or relevant policies are out of date, grant planning permission unless:
    - Any adverse impacts of doing so would significant and demonstrably outweigh the benefits, when assessed against the policies in the framework as a whole; or
    - Specific policies in the framework indicate development should be restricted.

5.21. Sustainable development is broadly defined in Paragraph 8 of the Framework as having three overarching objectives:

a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

5.22 Section 13 deals with protecting Green Belt land. It states at paragraph 137 that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open, and that the essential characteristics of Green Belt are their openness and their permanence.

5.23 Paragraph 147 and 148 state that;

Inappropriate development is, by definition, harmful to the Green Belt and should only be approved in very special circumstances.
When considering any planning application, local planning authorities should ensure that substantial weigh is given to any harm to the Green Belt. 'Very special circumstances' will

not exist unless the potential harm to the Green Belt by reason of inappropriateness and any other harm resulting from the proposal is clearly outweighed by other considerations.

5.24 Paragraph 151 states that:

When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases development will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.

5.25 Section 14 of the NPPF relates to how the planning system can help tackle the challenge of climate change, flooding and coastal change. At Paragraph 155 (c) it is stated that the planning system should identify opportunities for the development of renewable and low carbon energy sources.

5.26 Paragraph 158 states that '*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.

Supplementary Planning Documents and Guidance

Biodiversity and Geodiversity SPD

5.27 This document provides supplements Local Plan Policy BIO1 – Biodiversity and Geodiversity, providing general advice on how all developments can deliver benefits for biodiversity.

5.28 The document provides further guidance on ways in which biodiversity can be protected, conserved and enhanced, offering specific guidance on the information required for planning submissions.

/6 PLANNING POLICY ASSESSMENT

Principle of Development

Climate Change and Low Carbon Development

6.1. The UK is a member of the United Nations Framework Convention on Climate Change (UNFCCC). The UNFCCC is the key forum which oversees international action to tackle climate change. The UNFCCC led the development and adoption of The Paris Agreement in 2015. A total of 160 countries have pledged to cut their emissions as part of this process, although more action is needed in order to meet the Paris Agreement's aims of holding the increase in global average temperature rise to well below 2°C above pre-industrial levels and to pursue efforts to limit warming to 1.5°C.

6.2. The UK's pledge to reduce its emissions under the Paris Agreement was made as part of a joint pledge by members of the European Union (EU). EU Member States jointly agreed to a 2030 target of at least a 40% reduction in emissions below 1990 levels, supported by an EU-wide climate and energy package. This follows on from the 2020 package which aims to achieve a 20% reduction in emissions relative to 1990, a 20% energy efficiency improvement and a 20% share of renewables in energy consumption by 2020.

6.3. Through the 2008 Climate Change Act, the UK was the first country to introduce long-term, legally-binding national legislation to tackle climate change. The Act provides the UK with a legal framework including a 2050 target for emissions reductions, five-yearly 'carbon budgets' (limits on emissions over a set time period which act as steppingstones towards the 2050 target), and the development of a climate change adaptation plan.

6.4. According to the Committee on Climate Change, leaving the EU would change how UK carbon budgets are delivered; where policies previously agreed at EU level no longer apply or are weakened, new UK policies will need to replace them. But leaving the EU does not change the need to cut greenhouse gas emissions, the level of carbon budgets (which are set in UK law), or the duty on the UK Government to act to tackle climate change.

6.5. A review of the UK's 2050 target (previously set at 80% reduction) by the Committee on Climate Change prompted the Government to set a target of zero net emissions by 2050, which was legislated for in 2019. This was followed in December 2020 by the UK Government announcing a new ambitious target to reduce UK emissions by a least 68% by

2030, compared with 1990 levels. Recognising the urgency to go further to tackle climate change, the UK's new target to reduce greenhouse gas emissions – our Nationally Determined Contribution (NDC) under the Paris Climate Agreement – is among the highest in the world and commits the UK to cutting emissions at the fastest rate of any major economy so far.

6.6. At a national policy level, the NPPF recognises the need to meet the challenge of climate change, as set out in Section 14 of the Framework. Section 6 of the NPPF moreover recognises that radical reductions in greenhouse gas emissions are essential and looks to support renewable energy development where its impacts are, or can be made, acceptable.

6.7. It is therefore clear that there is overwhelming support at a national level for this type of development, and a demonstrable need for the UK to continue to deliver renewable energy projects.

6.8. At a local level, Barnsley Borough Council declared a climate emergency with the aim of bringing issues relating to the effects of climate change to everyone's attention. The Council has recognised that carbon emissions are the main factor driving rising temperatures and have pledged to become a carbon neutral council by 2040 and are aiming to help the entire borough achieve the same goal by 2045.

6.9. These are ambitious targets and to help achieve them, the Council approved their first Sustainable Energy Action Plan (SEAP) in September 2020. The SEAP sets out an ambitious and realistic vision for the borough to become net Zero Carbon by 2045 and help plan wider positive engagement around climate change, as well as providing the governance structure and carbon reduction targets. This SEAP recommends an ambitious first borough-wide ambition for 2025 to reduce its emissions by 65% (2017 baseline) and that as part of this, the Council have an ambition to reduce their own emissions by 60% (2019 baseline).

6.10. In setting out how to achieve these targets, the Council's approach will be predicated on a five themed hierarchy of reducing energy demand; engaging in positive behavioural change; using developed technology; using renewable energy; and offsetting emissions. The use of renewable energy is the most relevant to the proposed development. Under this heading the SEAP states:

"We want to increase the proportion of renewable energy that is generated within the borough and to increase the proportion of this energy that is owned within the borough -

retaining a greater proportion of our energy spend will have a significant impact including on fuel poverty.

We want to expand the use of renewable technologies for both electricity and heat across the borough and integrate these into buildings, assets and infrastructure. A key objective of the SEAP is to develop a supportive regime for installing renewable technologies. Currently there is a lack of awareness of the potential opportunities across Barnsley and no strategic policy framework to assist with installations. This awareness needs to be developed further. The main aim of any review would be the identification of investable renewable projects to power Barnsley's homes, public and commercial buildings.

We want to provide guidance for community groups and householders; and assessing opportunities for a number of specific renewables projects such as biodiesel, solar PV and micro hydro."

6.11. Taking the above into account, it is clear renewable energy plays an important role in achieving the Council's climate change targets. The Council are currently supporting renewable development schemes in the Borough, including solar schemes at The Glass Works and for Berneslai Homes working with Energise Barnsley. It is also pertinent that the wider target of achieving zero carbon across Barnsley by 2045 will need inward investment from parties such as the applicants, bringing this type of low carbon technology to the district.

6.12. In considering the position of the Development Plan, Local Plan Policy CC1 promotes and supports the delivery of renewable and low carbon energy. Policy RE1 deals directly with low carbon and renewable energy generation. Amongst measures to reduce carbon emissions are the implementation of renewable and low carbon energy sources. The policy goes on to state the Council will allow development that produces renewable energy as long as there is not material harm on a range of factors, including landscape character, living conditions, biodiversity, heritage assets, key views and highways safety.

6.13. It is important to note here that as well as being a low carbon technology, battery energy storage systems also assist in the direct exploitation of renewable energy. In planning terms, this was clarified in an appeal decision (ref. APP/R1010/W/17/3172633) for a similar facility in Hilcote, Derbyshire, where the Inspector confirmed that energy storage facilities

should fall to be considered under planning policies which deal with renewable energy generation, as a type of development required for the exploitation of renewables:

"…the appellant indicates that flexible peaking power generation capacity specifically forms part of the renewable energy infrastructure being developed to meet the UK's obligations under the EU Renewable Energy Directive, because renewable sources are supplies that are dependent on the time of day and weather conditions. Moreover, the Council accepts that in so far as the appeal proposal is required to provide greater capacity and flexibility in the energy generation network the proposed generators could be described as 'associated infrastructure' that would support the move towards low carbon energy supplied increasingly by renewable energy developments. It seems to me therefore that on balance it is not unreasonable to conclude that the proposed development would constitute development required for the exploitation of sources of renewable energy".

6.14. The Committee Report (included at Appendix A) for the previous approval on site covered by application reference 2017/0624 also accepts battery storage energy systems supports the transition to low carbon and renewable energy:

"Whilst the proposed is not for energy generation, it is accepted that it will support these aspirations through storing energy for release when it is needed, providing increased flexibility to the network and supporting the transition to low carbon and renewable energy."

6.15. It is clear from the above that the proposed development is compliant with the trust of the Development Plan in proposing a type of development which is low carbon, and which will assist in facilitating the greater deployment of renewable energy. It also has an important role to play in helping the Council achieve its ambitious target for a net zero carbon district by 2045.

Green Belt

6.16. The site is located within the Green Belt. Local Plan Policy GB1 states Green Belt will be protected from inappropriate development in accordance with national planning policy. The NPPF states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. LPAs should regard the construction of new buildings as inappropriate unless it falls within one the exceptions set out in NPPF paragraphs 149 and 150. The proposed development does not fall within one of these exceptions and is therefore 'inappropriate' in this sense. Accordingly, very special

circumstances are required where the potential harm to the Green Belt by reason of inappropriateness and any other harm resulting from the proposal must be clearly outweighed by other considerations.

6.17. A key consideration here is the previous approval on site for a comparable battery energy storage scheme under application reference 2017/0624. The Council considered very special circumstances to exist for the development proposals, which outweighed harm to the Green Belt. The planning submission and Council's Committee Report (included at Appendix A) demonstrate a range of clear benefits to the scheme were noted including the provision of low carbon energy, limited visual impacts and appropriate mitigation measures. Comparable benefits are proposed for development here, which are discussed in detail within the following sections.

Harm

6.18. It is acknowledged that there is harm by reason of inappropriateness associated with the Green Belt location of this site, which should be afforded significant weight in the decision-making process.

6.19. With regards to additional harm, it is helpful to consider the purposes for including the site within the Green Belt by looking at the five purposes served by Green Belt as set out in paragraph 138 of the NPPF, and how the site contributes to these purposes:

a) To check the unrestricted sprawl of large built-up areas;

b) To prevent neighbouring towns merging into one another;

c) To assist in safeguarding the countryside from encroachment;

d) To preserve the setting and special character of historic towns; and

e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

6.20. The site is located within a rural location, adjacent to an existing substation and associated grid connection. Whilst the proposed development would result in a small extension of development into the countryside, the scale of the scheme ensures that this would not result in 'unrestricted sprawl'. Nor would the proposed development result in the merging of towns given the location and scale of the proposals which are located approximately 1km

from the nearest settlement of Stocksbridge. No conflict with purposes (a) and (b) are therefore considered to exist.

6.21. It is acknowledged that there would be some encroachment into the countryside as the result of the scheme. It is however noted that the field in which the site is located adjoins an existing substation to the east, which has already introduced industrial infrastructure, along with the pylons and overhead lines which cross close to the site, to this locality. The north, east and southern boundaries are more open, with the topography increasing to the south. Given the existing substation to the east, and the numerous pylons and lines running through and from the site the site does not necessarily share 'openness' as a characteristic as other Green Belt sites in the district might do. Accordingly, whilst a conflict with (c) is identified, this is tempered by the existing development in close proximity.

6.22. Regarding clause (d), the site is not located in proximity to any historic towns or their setting. The site is located in a rural area, approximately 1km from the nearest town and there are no designated heritage assets within proximity of the site. There is therefore no conflict with clause (d).

6.23. Clause (e) is not considered relevant to this proposal and therefore no conflict is identified.

6.24. In terms of the harm to openness as a result of the proposed development, as set out above the site is located adjacent to an existing substation and its associated infrastructure. As such, it is not an inherently 'open' site. Whilst the site is currently devoid of development and open in that sense, it is not considered that the site shares the more open characteristics of the Green Belt in nearby rural locations which are devoid of all built development.

6.25. The previous approval on site for an energy storage facility on site under application reference 2017/0624 should be given significant consideration here as to the acceptability of this form of development within the Green Belt. In relation to harm to openness as a result of the development, the previous approval provides clear evidence of the acceptability of a battery storage facility on site. The following was noted in relation to Green Belt harm within the Committee Report (included at Appendix A):

'The harm to the green belt is in part mitigated by the location of the proposed development, within the confines of the existing substation, which is an existing urban structure with clearly defined boundaries. The topography is such that the site is not highly visible over medium

to long distance views, as demonstrated in the landscape and visual analysis accompanying the application. The site is highly visible in the immediate vicinity as viewed from Tofts Lane, Mucky Lane and the Public Rights of Way to the north and North West, all of which offer opportunities for outdoor recreation. Nevertheless the proposed battery storage, within the context of the existing substation, represents an intensification of the existing urban form rather than a standalone feature. In this respect the harm to the Green Belt is reduced.'

6.26. Taking into account the above, any harm to the Green Belt is therefore mitigated through the location of the scheme within the confines of the existing substation, which has an urbanising effect on the site. The topography of the site further reduces the schemes impacts on wider views on the site. The harm to the openness of the Green Belt is therefore limited and can be adequately mitigated, as confirmed by the Council in the 2017 approval.

6.27. In terms of the proposed development itself and any resulting loss of openness and visual harm in this sense, it is considered that this has been mitigated as far as possible through sensitive design and the provision of a comprehensive landscaping scheme. Particularly, the development of the Site would be in keeping with local land uses including the Electricity sub-station directly adjacent to the east of the Site. The Site is visually well contained within the wider countryside and does not form an integral part of the wider swathe of the Green Belt or open countryside to the north of Stocksbridge. The overall magnitude of effect would be Negligible and overall significance of effect anticipated to be Negligible.

6.28. Overall, it is considered that there would be some inevitable harm to openness as a result of the proposed development, but that this has been limited as far as possible through sensitive design.

6.29. The above points are reiterated in the Landscape and Visual Assessment, which finds that:

The proposed development is anticipated to give rise to some Minor effects on landscape character and Negligible to Minor adverse effects on landscape features and vegetation at the Site level whilst the effects on the Green Belt designation is anticipated to be Negligible adverse. It is therefore considered that the development of the Site would not constitute an overall significant or unacceptable environmental effect. .

Moreover, the proposed development is considered to have a range of Negligible to Moderate adverse effects on visual receptors within the study area, primarily for receptors within and

in close proximity to the Site. Due to the surrounding landform the Site is largely visually contained and any adverse effects are anticipated to reduce over time as the proposed planting matures.

6.30. In conclusion, it is acknowledged that in addition to the harm by reason of inappropriateness, other harms ensuing from the proposed development are some minor effects on landscape character and negligible to minor adverse effects on landscape features at site level. Effects on the Green Belt designation are anticipated to be negligible.

6.31. Weighed against this harm are the 'other considerations' including the benefits of the proposed development which are set out below:

Other Considerations and Benefits

Environmental Benefits

6.32. Section 14 of the NPPF deals with climate change and states that the planning system should help to support the transition to a low carbon economy. This includes through supporting renewable and low carbon energy and associated infrastructure.

6.33. The proposed development will take up energy at times of low demand, store this energy, and release it back to the grid at times of higher demand. It is proposed that the energy storage facility will draw energy from renewable sources only (secured through a power-purchase agreement with a renewable energy provider). Accordingly, the proposals would constitute a type of development required for the exploitation of renewable energy as set out earlier in this statement. This type of scheme is therefore a vital component in the drive towards a zero carbon – something which has been recognised by the UK Government as set out in the opening of this Section of the Planning Statement. This type of technology has an important role to play across the National Grid, and at a local level in Barnsley's own target to achieve zero carbon by 2045.

6.34. The proposals are an inherently 'low carbon' type of development. The storage of energy, reduces losses and in addition to providing energy security (covered below), reduces the amount of energy that needs to be produced, not just from renewable sources, but from non-renewable sources such as coal and gas. The carbon savings and associated wider environmental benefits of the proposed development should therefore be afforded significant weight in the determination of this planning application. It is noted that at

paragraph 151 of the NPPF, it is said that very special circumstances may include the wider environmental benefits associated with the increased production from renewable sources.

Biodiversity Net Gain and Ecological Enhancements.

6.35. The proposed development will result in a loss in biodiversity, with an overall loss of -0.16, or -18.08% in habitat units. Although not yet enshrined planning policy, the Environmental Act 2021 requires a mandatory 10% net gain and this will be a requirement on all proposals in the future.

6.36. Given the nature of the development, it is extremely difficult to provide suitable on-site mitigation. In this case however, due to the requirement for an on-site balancing pond to assist with surface water drainage, a level of mitigation can be provide to offset the loss. In order to further offset the loss, the applicant has managed to negotiate with the landowner the use of a further field to the east of the existing substation in order to provide off-site mitigation through enhancement of the additional site through its use as a wildflower meadow.

6.37. The applicant is happy to discuss further off-set compensation that may be deemed to be required to ensure the proposal does not result in a complete net loss of biodiversity units. We are happy to discuss whether the LPA have a mechanism to facilitate an off-set payment or whether an environmental credit broker could be approached to offset the loss. That said, the landscape scheme would result in a beneficial landscape and visual impact within the local landscape above the previously approved scheme for simply the battery storage site. This is because the site boundary now includes an enhanced wildflower meadow to screen the battery storage facility from view. Overall, the LVA submitted to support this application finds that moderate beneficial impacts would result in terms of the vegetation proposed on site, compared with the existing situation on site and certainly against the previously approved proposal.

Security of Energy Supply

6.38. One major drawback of renewable projects has been that the energy they produce is largely dependent on conditions on site beyond the control of the developer (i.e. wind speed, light, etc.). The proposed energy storage facility will assist by providing energy balancing services, in addition to ensuring that energy is not simply lost when demand is low. As the UK transitions to greener energy production, energy storage is vital to ensure that energy is available as and when needed. Without this type of facility on our National Grid, the UK

will need to continue to produce energy via more 'reliable' means involving non-renewable resources.

6.39. This type of facility also has the capability to reduce the UK's reliance on foreign imports of energy, including gas, helping to secure our own energy supply. At the time of writing, with rising energy bills at the forefront, this type of scheme is essential.

Need and Locational Constraints

6.40. There is an urgent need to decarbonise our energy supply, recognised nationally and by Barnsley Borough Council, and technology such as this plays an important role. The applicants have secured a connection to the Grid for the 25MW capacity proposed by this development, which would not have been granted by Northern Powergrid (the district network operator who are responsible for the grid and energy supply in this area) were it not needed. Such connections are being granted across the UK as there is very much an urgent need for this type of scheme, and we are a long way off reaching a point where more energy storage is not required. It is also noteworthy that at paragraph 158 of the NPPF, it is stated that:

"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."

6.41. In awarding funding to various energy storage projects in February 2022, Energy and Climate Change Minister Greg Hands said:

"Driving forward energy storage technologies will be vital in our transition towards cheap, clean and secure renewable energy.

It will allow us to extract the full benefit from our home-grown renewable energy sources, drive down costs and end our reliance on volatile and expensive fossil fuels. Through this competition we are making sure the country's most innovative scientists and thinkers have our backing to make this ambition a reality".[1]

[1] https://www.gov.uk/government/news/government-boost-for-new-renewable-energy-storage-technologies

6.42. Whilst the site is located within the Green Belt, there are a number of locational constraints associated with the deployment of energy storage facilities. In order for an energy storage connection to be viable, the point of connection must meet the following criteria:

- It must be located on a part of the electricity network that has available capacity;
- It must be located at a strategic substation; and
- It must be located at a substation with available demand capacity.

6.43. Such criteria are not commonplace. The above criteria are however all met at the point of connection for the proposed development, the Hunshelf electricity distribution substation to the immediate east of the site. In addition, there is a willing landowner, who supports the scheme.

6.44. The site of the energy storage facility itself must be in close proximity to the point of connection, since locations which are distant from the connection point are unlikely to be viable due to the additional infrastructure costs of laying cables, and since system losses over longer distances would render a connection that is further away unviable.

6.45. In addition to obtaining planning consent, a viable connection to the grid must also be obtained. Grid connection for battery storage is a highly specialised requirement given the need to both import and export energy from and to the grid as required. Viable grid connections are therefore not commonplace. At this site, a grid connection is available and is viable, provided the energy storage equipment is located in close proximity, as is proposed here. In addition, there is a willing landowner who is keen to see this development come forward.

6.46. Notwithstanding the above, a project of this size could not connect elsewhere on the local network as it would be outside of the equipment ratings/parameters and would not be technically feasible.

6.47. BESS projects are developed subsidy free and the investment case has to meet strict criteria to be fundable. One of the criteria is grid connection and being in proximity to equipment that is capable of accommodating the scale of the project. Proximity can vary between connection points, however generally the closer the site is to the connection point, the better from a technical and financial point of view. At this particular site, the entire area in

the vicinity of the point of connection is within the Green Belt, with no undeveloped land outside of the Green Belt capable of accommodating the size of project proposed.

6.48. Finally, the development cannot be sited within the adjacent Norther Powergrid compound (electricity distribution site) as the land in question is not available and will not be made available to third parties. NPg consider this operational land and the space only exists due to the older outdoor equipment being removed in favour of indoor equipment. NPg would not want to dispose or lease the available land as it is strategically important, as future upgrades to the electricity network here might require the use of that land and as a DNO they have responsibilities to protect the future energy scenarios whatever they may be.

Balance

6.49. In order for very special circumstances to exist, the harm by reason of inappropriateness and any other harm must be clearly outweighed by other circumstances as required by paragraph 148 of the NPPF.

6.50. As set out above, the harm by reason of inappropriateness is only marginally increased by other harm relating to some minor conflicts with the purposes of including the site within the Green Belt and some negligible to moderate landscape and visual impacts. Weighed against this are the benefits of the scheme and other considerations:

- Environmental benefits associated with this low carbon technology, which will help to allow the deployment of more renewable energy at a time when Wakefield Council has declared a climate emergency and climate change should be at the forefront of policy and decision-making;
- The contribution made by the proposals to the security of our energy supply;
- The minimal loss of ecological and biodiversity associated with the development, including an overall net loss of -18.08% in habitat units.
- Comprehensive landscaping scheme and enhanced wildflower meadow within the site which has a beneficial impact in terms of vegetation cover, which assists in screening the development within the local landscape;
- The urgent need for battery energy storage technology across the Grid; and

- The locational constraints associated with this type of technology, which mean that points of connection are a rarity.

6.51. It is considered that the benefits and other considerations listed above should be afforded significant weight and that these factors clearly outweigh the harm associated with this development, such that very special circumstances exist.

Summary on Principle of Development

6.52. There is overwhelming support at a local and national level for renewable and low carbon technologies. In declaring a climate emergency, Barnsley Borough Council have recognised the urgent need to address carbon emissions and support schemes which can facilitate this. It is therefore considered that the proposed development is wholly in accordance with national and local policy in this respect.

6.53. Local Plan Policy GB1 states Green Belt will be protected from inappropriate development in accordance with national planning policy. As per the NPPF, very special circumstances are required where the potential harm to the Green Belt by reason of inappropriateness and any other harm resulting from the proposal must be clearly outweighed by other considerations.

6.54. The above has demonstrated that very special circumstances exist and as such national and local Green Belt policy is adhered to. It is also considered that the emerging policy is complied with since there is an overriding need for this type of technology wherever it can be accommodated if the effects of climate change are to be reversed, or at the very least slowed, and that the location proposed is the most sustainable option.

Technical Considerations

Landscape Character and Visual Amenity

6.55. Policy LC1 relates to landscape character and states development will be expected to retain and enhance the character and distinctiveness of the individual Landscape Character area in which it is located. Policy D1 also sets out design principles, expecting developments to take advantage and reinforce landscape character and topography.

6.56. It is acknowledged that as a result of the local landform the Site is largely visually contained and visual effects are anticipated to range from Moderate for receptors using the Footpath to the north of the Site.

6.57. Within the previous Committee Report for the site (included at Appendix A), the battery storage development was considered acceptable in terms of visual amenity. The proposals will seek to enhance the existing improved grassland with species-rich wildflower meadow and are therefore considered to have no greater harm from a visual impact perspective over the previously approved scheme.

6.58. Overall, the proposed development is considered the comply with local and national policy with regards to landscape and visual matters, and certainly the proposed development has been designed to ensure that it has minimal impacts in this respect.

Flood Risk

6.59. The proposed development is sited in Floor Zone 1 in line with Policy CC3 and the NPPF which directs new development towards areas with the lowest risk of flooding. The drainage strategy for the development is considered suitable for this site, ensuring that the development would not increase the risk of flooding, and utilises sustainable drainage techniques in line with Policy CC3.

Highways

6.60. In line with Policy T4, the submitted Transport Assessment demonstrates that the site can be accessed conveniently and safety. Trip numbers associated with the operation of the site are low, and those generated during the construction period will be managed to ensure there are no adverse impacts on the local and wider highways network.

Ecology

6.61. An ecology assessment has been provided as outlined in Section 4. The assessment has demonstrated that there would be a -18.08% net loss of habitat units will be incurred as a result of the proposed development. It is likely that off-site habitat creation or off-set compensation may be required to ensure the proposals do not result in a net loss of biodiversity units. The proposals therefore accord with Policy BIO1, providing biodiversity enhancement to the site despite the development proposed.

Residential Amenity

6.62. A noise assessment has been provided which demonstrates that noise levels at the closest sensitive receptors would be within acceptable limits. The development site is also located

approximately 500m from the nearest residential property to the south west. As such, the proposals are considered to comply with the residential amenity matters of Policy GD1. There would be no other forms of emissions associated with the development.

PLANNING BALANCE

6.63. In principle, there is clearly support for renewable energy and development that moves us towards a low carbon future at a national and local level, provided the impacts of any such development can be made acceptable.

6.64. As set out previously, the proposals are in complete accordance with local and national planning policy on climate change and low carbon development. As the site is in the Green Belt, there is a need to demonstrate that very special circumstances exist. In this instance, it is considered that the harm by reason of inappropriateness and any other harm is significantly outweighed by the benefits and other considerations associated with the development, such that very special circumstances exist.

6.65. It has been identified that minor to negligible adverse effects are anticipated to landscape character whilst visual effects are anticipated to range from moderate for receptors using the footpath to the north of the Site to minor adverse and negligible for a limited number of receptors in close proximity to the Site. However, the development of the site for a comparable battery energy storage scheme has previously been adjudged acceptable by the Council under application reference 2017/0624. Within this scheme the visual impact of development was deemed acceptable within the local landscape.

6.66. The public benefits of the proposed development are considered significant in this instance, involving the environmental benefits associated with this type of low carbon technology, the benefits to energy security, and the substantial increases in biodiversity net gain. It is considered that these benefits sufficiently outweigh the less than substantial harm to the identified heritage assets, and the moderate adverse impacts in term of landscape and visual, which are experienced in close proximity to the site.

6.67. The proposed development would not have an adverse impact on ecology, the local highway, local and residential amenity, flood risk or drainage, and there are no other pollution concerns. There would be a loss in biodiversity across the site, with an overall loss of -18.08% in habitat units.

6.68. Overall, it is considered that very special circumstances exist to allow this development to take place in the Green Belt. All other impacts are, or can be made, acceptable, and where there are minor conflicts with policy, it is considered that the benefits of the scheme overwhelmingly outweigh these conflicts.

/7 CONCLUSION

7.1. PWA Planning has been retained by Harmony (HS) JV Limited to submit a planning application for the development of an energy storage facility on land off Tofts Lane, Hunshelf, Sheffield.

7.2. The principle of the development is considered acceptable in line with local and national policy, where very special circumstances are considered to exist. Any minor conflicts with policy that have been identified are considered to be outweighed by the numerous benefits of the development, including that the scheme is in accordance with the UK Government's aim to move towards a low carbon economy and reduce greenhouse gas emissions in line with their legally binding targets, and with Barnsley Borough Council's own declaration of a climate emergency.

7.3. The site has also had a previous scheme for a comparable battery energy storage facility approved in 2017, which was deemed acceptable both in terms of its principle and from a visual impact perspective. In this case, we have sought to minimise the loss of biodiversity from the site, an element not considered with the previous approval, ensuring that the net loss is only -18.08% across the site.

7.4. The proposed development represents sustainable development which accords with the Development Plan. There are no technical reasons which suggest planning permission should not be granted and furthermore there are important materials considerations which weigh heavily in favour of the scheme. As such, the proposals should be approved without delay.

APPENDIX A

2017/0624

Applicant: Enstor Power UK Limited, C/o Kieran Tarpey

Description: Formation of a battery energy storage facility with associated transformer cabling security fencing and CCTV Poles.

Site Address: Tofts Lane, Snowden Hill, Barnsley, S36 8YR

The application has been brought before Members as a departure from the Unitary Development Plan and emerging Local Plan.

Description

The site is an open grassed area located within the boundaries of the existing sub-station. Ground levels rise as the land moves southwards away from Tofts Lane which runs east west along the northern boundary of the site.

The existing substation is located to the east of the site with access roughly in the middle and the proposed site located to the west. The site is contained within a low dry stone wall and there is high safety fencing around the substation itself. A number of high voltage lines converge at the site.

The wider area is rural greenbelt, largely used for pasture.

Proposed Development

It is proposed to install and operate a battery storage facility.

The facility will consist of an array of 26 units housing batteries, transformers, a Power Conversion System (PCS), District Network Operator (DNO) electricity connection cabinet and ancillary equipment. Each of the 26 units measure 12.2m in length by 2.6m in width and are 2.9m in height. The units will be sited on a series of raised concrete supports which are 0.2m in height giving the units an overall height of 3.1m

The facility is contained within a 2.5m high perimeter palisade fence and it is proposed to erect 16 CCTV cameras on 2.6m high poles.

There is a requirement for a transformer enclosure on the site which will contain a step-up transformer to raise the output voltage of stored electricity, making it capable of being introduced safely to the sub-station. The transformer would be operated by the DNO once commissioned.

Permanent access for the site for maintenance and operation purposes is proposed from the existing field access off Tofts Lane. Maintenance would be made by light van or 4x4 type vehicles carry necessary tools with a frequency of 10-20 visits a year which is once or twice a month. A temporary construction access will be via the existing substation access further along Tofts Lane.

Planning History

2016/0296 – Erection of enclosed battery storage at Land west of Hopewell Street, Stairfoot, Barnsley (Approved)

2017/0117 – Erection of Battery Storage Facility at Land West of Hopewell Street, Stairfoot, Barnsley (amended location) (Approved)

2017/0801 – Erection of detached building to house battery electricity storage units and provision of ancillary infrastructure, Land at Barnsley Retail Park, Barnsley, S71 1JE (Undetermined)

2017/0957 – Erection of building to house battery storage facility, Land North of Twibell Street, Barnsley, S71 1JE (Undetermined)

Policy Context

Planning decision should be made in accordance with the development plan unless material considerations indicate otherwise and the NPPF does not change the statutory status of the development plan as the starting point for decision making. The development plan consists of the Core Strategy and the saved Unitary Development Plan policies. The Council has also adopted a series of Supplementary Planning Documents and Supplementary Planning Guidance Notes, which are other material considerations.

The Council has submitted our emerging Local Plan to the Secretary of State but we are at an early stage in the examination process. It establishes policies and proposals for the development and use of land up to the year 2033. The document is a material consideration and represents a further stage forward in the progression towards adoption of the Local Plan. As such increasing weight can be given to the policies contained within the document although, in accordance with paragraph 216 of the NPPF, the extent of this will depend on:

- The extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given) and;
- The degree of consistency of the relevant policies in the emerging plan to the policies in the NPPF (the closer the policies in the emerging plan to the policies in the NPPF, the greater the weight that may be given).

<u>Saved UDP Policies</u>

UDP notation: Green Belt

Saved Policy GS6 Extent of the Green Belt

<u>Core Strategy</u>

CSP 34 ‘Protection of Green Belt’ In order to protect the countryside and open lane around built up areas the extent of the Green Belt will be safeguarded and remain unchanged.

CSP 1 ‘Climate Change’ Development will be expected to reduce a mitigate the impact of growth on the environment and carbon emissions, ensure existing and new communities are resilient to climate change and harness the opportunities that growth, and its associated energy demands, brings to increase the efficient use of resources through sustainable construction and the use of renewable energy.

CSP 4 ‘Flood Risk’ the extent and impact of flooding will be reduced.

CSP 6 ‘Development that Produces Renewable Energy’ we will allow development that produces renewable energy as long as there is no significantly harmful effect on (amongst other criteria): the character of the landscape and appearance of the area, biodiversity, geodiversity and water quality and highway safety.

CSP26 ‘New Development and Highway Improvement’ if development is not suitably served by the existing highway, or would create or add to highway safety problems or the efficiency of the highway for all road users, we will expect developers to take mitigating action or to make a financial contribution to make sure the necessary improvements go ahead.

CSP29 ‘Design’ sets out that high quality design shall be expected.

CSP 36 ‘Biodiversity and Geodiversity’ development is expected to conserve and enhance the biodiversity and geological features of the borough.

CSP 37 ‘Landscape Character’ development will be expected to retain and enhance the character and distinctiveness of the individual Landscape Character Area in which it is located (F2: Penistone Upland Farmland).

Publication Draft Local Plan

The site is located within the Green Belt as shown on the emerging Local Plan Proposals Map, therefore policy GB1, Protection of the Green Belt applies, protecting the Green Belt from inappropriate development in accordance with National Planning Policy.

In addition the following policies apply:

Policy SD1, Presumption in favour of Sustainable Development;
GD1, General Development;
T4, New Development and Highway Improvement
D1, Design
BI01, Biodiversity and Geodiversity
LC1, Landscaper Character
CC1, Climate change and Sustainable Construction
CC3, Flood Risk
RE1, Low Carbon and Renewable Energy

NPPF

The National Planning Policy Framework sets out the Government’s planning policies for England and how these are expected to be applied. At the heart is a presumption in favour of sustainable development. Development proposals that accord with the development plan should be approved unless material considerations indicate otherwise. Where the development plan is absent, silent or relevant policies are out-of-date, permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework as a whole; or where specific policies in the Framework indicate development should be restricted or unless material considerations indicate otherwise.

In respect of this application, relevant policies include:

Para 7 – 3 dimensions to sustainable development
Para 14 – Presumption in favour of sustainable development
Para 17 – Core Planning Principles, in particular:

"take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it" and

"support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy)".

Section 9 – Protecting Green Belt Land:

Para 79 -"*The Government attaches great importance to Green Belts. The fundamental aim of Green Belt Policy if to prevent urban sprawl by keeping land permanently open: the essential characteristics of Green Belts are their openness and their permanence*"

Para 87 – "*as with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances*"

Para 88 – "*When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very Special Circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations*".

Para 91 –"*When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources".*

Para 98 – "*when determining 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".*

<u>Other material considerations</u>

The Green Paper – Building Our Industrial Strategy 2017

The green paper sets out how the Government proposes to build a modern industrial strategy. It was release January 2017 but is only in the early stages of consultation. Nevertheless is provides an indication of the Governments direction of travel.

There are 10 pillars for the strategy of which pillar No.3 – Upgrading Infrastructure and No.7 Delivering affordable energy and clean growth are particularly relevant.

There is a drive to reducing energy costs for businesses alongside meeting the decarbonisation goals. The Smart Meter Programme is identified as key to addressing the challenges for the network created by the switch to low carbon energy. Further steps to take advantage of the opportunities for a more responsive network are also being investigated.

A Smart, Flexible Energy System – A call for evidence 2016 (Ofgem and the Department for Business, Energy and Industrial Strategy)

This paper is referenced in the Green Paper and commits to a programme of research and innovation in energy storage and other smart technologies which aligns with the work underway on designing a smart grid and the roll-out of public charging points for electric vehicles, and smart meters at homes and commercial premises.

The issue of enabling energy storage as a potential source of flexibility for the energy system is covered in some detail in this paper. Falling costs of batteries has made this technology more viable on a larger scale and there is an acknowledged need to remove barriers to bringing projects forward. Key barriers are identified as:

- network connections;
- network charging;
- final consumption levies;
- planning; and
- regulatory clarity

The paper acknowledges that small storage projects <50MW must seek planning permission under the Town and Country Planning Act and that clarity is needed in the Planning framework about how to classify and treat storage projects, given the emerging nature of the market and new technologies.

The paper also confirms that there is a desire to see competitive markets for flexibility, including storage where possible stating:

"*any asset owned or operated by a regulated monopoly has the potential to distort competition or deter entry to new markets. To some extent, this issue is addressed through current rules requiring network operators to operate by a regulated monopoly has the potential to distort competition or deter entry to new markets*".

Consultations

Parish Council – "*The members of the Hunshelf Parish Council appreciate the need for such a storage facility in the light of the increase in electricity generation from wind power or solar arrays.*

They agree that the site is one that has advantages for the developer but despite the nearness of the power substation itself; it is in a very rural, quiet and attractive area to visit.

With the latter in mind, the parish council requests that the developer pay more attention to "hiding" the installation. The metal housing units will be intrusive in the landscape and the security lighting poles will be highly visible. The intrusion of another security fence is a further erosion of the visual amenity of the area.

It is noted that the developer intends to plant "semi-mature" trees to hide the new development. The parish council asks that special consideration is given to the species of trees to be used. Evergreens, (native ones) will give cover all year through, but can be "alien" in this area which is very much broad leaf woodland. It is suggested that a mixture of hedgerow trees would be most appropriate. Hawthorn, Blackthorn etc, will grow to substantial trees if allowed to grow freely.

Whilst realising that flooding is a real risk to such installations, my members have asked, if permission is granted for this development, that the units should be sunk into the ground to

lower the visual impact. They understand that there would have to be adequate drainage of the site".

Highways DC – No objections subject to conditions

Ecology – Raised some concerns regarding the ecology report and in particular the proposed mitigation / enhancement measures. A condition has been added.

Drainage – No objections

Pollution – No objections

Planning Policy – Difficulty in accepting that the development is temporary given it is for a period of 25 years. However, it is reasonable to conclude that the battery storage at Hunshelf is 'complimenting renewable energy technologies' because one of the reasons that there are peaks and troughs is because of the wind farms (and solar farms) in the area. As such para 91 of the NPPF applies as the proposal will aid the efficiency of the production of energy from renewable sources. CSP6 can only be afforded limited weight because it specifically relates to development that produces renewable energy.

Representations

There are no immediate neighbours however the application was advertised through site notices (placed on footpath signage) and a press advert. No comments have been received.

Assessment

Material Consideration
Principle of Development
Visual Amenity
Highway Safety

Principle of Development

The proposed is inappropriate development within the Green Belt. Green Belt policy states that inappropriate development is by definition harmful to the Green Belt and should not be approved except in very special circumstances.

The harm to the Green Belt, from the proposed development, is caused by the visual impact of the battery storage units and associated infrastructure on the landscape and from the increased highway movements associated with the proposed. The NPPF defines the essential characteristic of the green belt as "their openness and their permanence". The proposed will have a harmful impact on this characteristic.

The harm to the green belt is in part mitigated by the location of the proposed development, within the confines of the existing substation, which is an existing urban structure with clearly defined boundaries. The topography is such that the site is not highly visible over medium to long distance views, as demonstrated in the landscape and visual analysis accompanying the application. The site is highly visible in the immediate vicinity as viewed from Tofts Lane, Mucky Lane and the Public Rights of Way to the north and North West, all of which offer opportunities for outdoor recreation. Nevertheless the proposed battery storage, within the context of the existing substation, represents an intensification of the existing urban form rather than a standalone feature. In this respect the harm to the Green Belt is reduced.

The impact is further lessoned by the lowering of the height of the units and through the planting of screening around the proposed. This will soften the appearance as well as providing some benefits to biodiversity through the enhancement of habitat.

Notwithstanding this, substantial weight must be given to the harm to the green belt when assessing the very special circumstances which will not exist unless the potential harm to the green belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

The applicants have set out their case for the very special circumstances required to justify the development in paragraphs 3.31 – 3.35 of their Greenbelt Statement. In summary the batteries are required to provide storage of electricity, increasing the flexibility of the Grid to respond to fluctuations in energy demand. This increased flexibility is required to support the Government's target of reducing carbon emissions which will be achieved through the decommissioning of carbon intensive plants and delivery of low carbon generation i.e. wind and solar; low carbon generation being inherently inflexible in relation to when they generate electricity.

Paragraph 91 of the NPPF states that "*elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources".*

Paragraph 98 requires Local planning authorities to recognise that even small scale projects (for energy development provide a valuable contribution to cutting greenhouse gas emissions and approve the application if its impacts are (or can be made) acceptable, unless material considerations indicate otherwise.

Core Strategy Policy CSP 1 and to a lesser extent CSP 6 are also relevant, setting out the Council's aspirations with regards climate change and renewable energy.

Whilst the proposed is not for energy generation, it is accepted that it will support these aspirations through storing energy for release when it is needed, providing increased flexibility to the network and supporting the transition to low carbon and renewable energy.

Having established that there is a clear benefit to the proposed and that this can be considered to form part of the very special circumstances, the next step has been to assess alternative locations for the proposed development. The applicant has provided substantial information regarding the location of the proposed and an assessment of alternatives. They have applied a 3 stage process starting with developing appropriate site selection criteria:

Stage 1 – Site Selection Criteria, point of connection which:

- Is the right connection voltage;
- Sufficient reserve power flow capacity or demand nearby to accommodate the battery discharging;
- Sufficient voltage 'headroom' to accommodate a battery discharge at sufficient speed to match the frequency response chosen; and
- Sufficient import capacity to recharge the battery.

Stage 2, was a sifting exercise of all the potential points of connection in the District Network Operators area utilising this criteria.

Stage 3 was a second sifting exercise, this time applying the following secondary criteria:

- Capacity of grid connection;
- Size of site;

- Land availability by willing land owner;
- Unsuitable topography;
- Non-greenbelt land;
- Best and most versatile land;
- In sensitive areas as defined by the EIA regulations;
- Poor highway infrastructure;
- Distance to sub-station;
- Flood zones;
- Sensitive human receptors;
- Landscape and visual considerations;
- Heritage considerations.

This sifting process reduced the available sites down from 697 to 5 which were technically feasible for the proposed 40mw. These include the proposed with the remaining 4 located in less sensitive areas but all unavailable for the proposed development due to space constraints or because of land ownership issues.

The proposed being within the ownership of the DNO, having sufficient space for the proposed and the technical capacity is therefore the only suitable site for the battery storage.

It is therefore accepted that, weighing all the above in the balance, there are very special circumstances for the proposed development which outweigh the harm to the green belt.

Visual Amenity

The proposed batteries are housed within 26 storage units measuring 12.2m in length by 2.6m in width and 2.9m in height. The units will be sited on a series of raised concrete supports which are 0.2m in height giving the units an overall height of 3.1m. The facility is contained within a 2.5m high perimeter palisade fence and it is proposed to erect 16 CCTV cameras on 2.6m high poles.

Given the rural nature of the landscape, the proposed will impact on visual amenity being an urban form of development. Its location within the confines of the existing substation reduces the impact by virtue of it being contained within an existing urban form which undoubtedly has a more significant impact on the environment.

The visual impact is further mitigated by the provision of a substantial planting buffer around the site, which the applicant has agreed to change to Hawthorn and Blackthorn following consultation with the Parish Council. This type of hedgerow is not wholly characteristic of the area with field boundaries mostly demarked by stonewalls, however, it will soften the appearance and the species will not be out of place in this rural landscape. This approach is also in keeping with the recommendations of the Landscape Character Assessment for this area and will bring biodiversity improvements.

The proposed is therefore acceptable in terms of visual amenity.

Highway Safety

The proposed will not generate significant traffic once operational and a highway condition survey and construction methodology has been conditioned to ensure construction traffic and any damage caused to the highway is mitigated. Highway Officers have assessed the application and raised no objections.

Recommendation

Grant subject to conditions:-

1 The development hereby permitted shall be begun before the expiration of 3 years from the date of this permission.
Reason: In order to comply with the provision of Section 91 of the Town and Country Planning Act 1990.

2 The development hereby approved shall be carried out strictly in accordance with the plans (Site Layout Plan V1.3, Container Plan dated 21.06.17, Standard Security Camera Plan dated 02.05.17 and Standard 2.5m Security Fence dated 02.05.17) and specifications as approved unless required by any other conditions in this permission.
Reason: In the interests of the visual amenities of the locality and in accordance with LDF Core Strategy Policy CSP 29, Design.

3 No development shall take place until full details of the proposed colour of the containers, security fencing and security camera and mounting poles have been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.
Reason: In the interests of the visual amenities of the locality and in accordance with Core Strategy Policy CSP 29, Design.

4 The parking/manoeuvring facilities, indicated on the submitted plan, shall be surfaced in a solid bound material (i.e. not loose chippings) and made available for the manoeuvring and parking of motor vehicles prior to the development being brought into use, and shall be retained for that sole purpose at all times.
Reason: To ensure that satisfactory off-street parking/manoeuvring areas are provided, in the interests of highway safety and the free flow of traffic and in accordance with Core Strategy Policy CSP 26, New Development and Highway Improvement.

5 Prior to any works commencing on-site, a condition survey (including structural integrity) of the highways to be used by construction traffic shall be carried out in association with the Local Planning Authority. The methodology of the survey shall be approved in writing by the Local Planning Authority and shall assess the existing state of the highway. On completion of the development a second condition survey shall be carried out and shall be submitted for the written approval of the Local Planning Authority, which shall identify defects attributable to the traffic ensuing from the development. Any necessary remedial works shall be completed at the developer's expense in accordance with a scheme to be agreed in writing by the Local Planning Authority.
Reason: In the interests of highway safety and visual amenity and in accordance with Core Strategy Policy CSP 26, New Development and Highway Improvement, and CSP 29, Design.

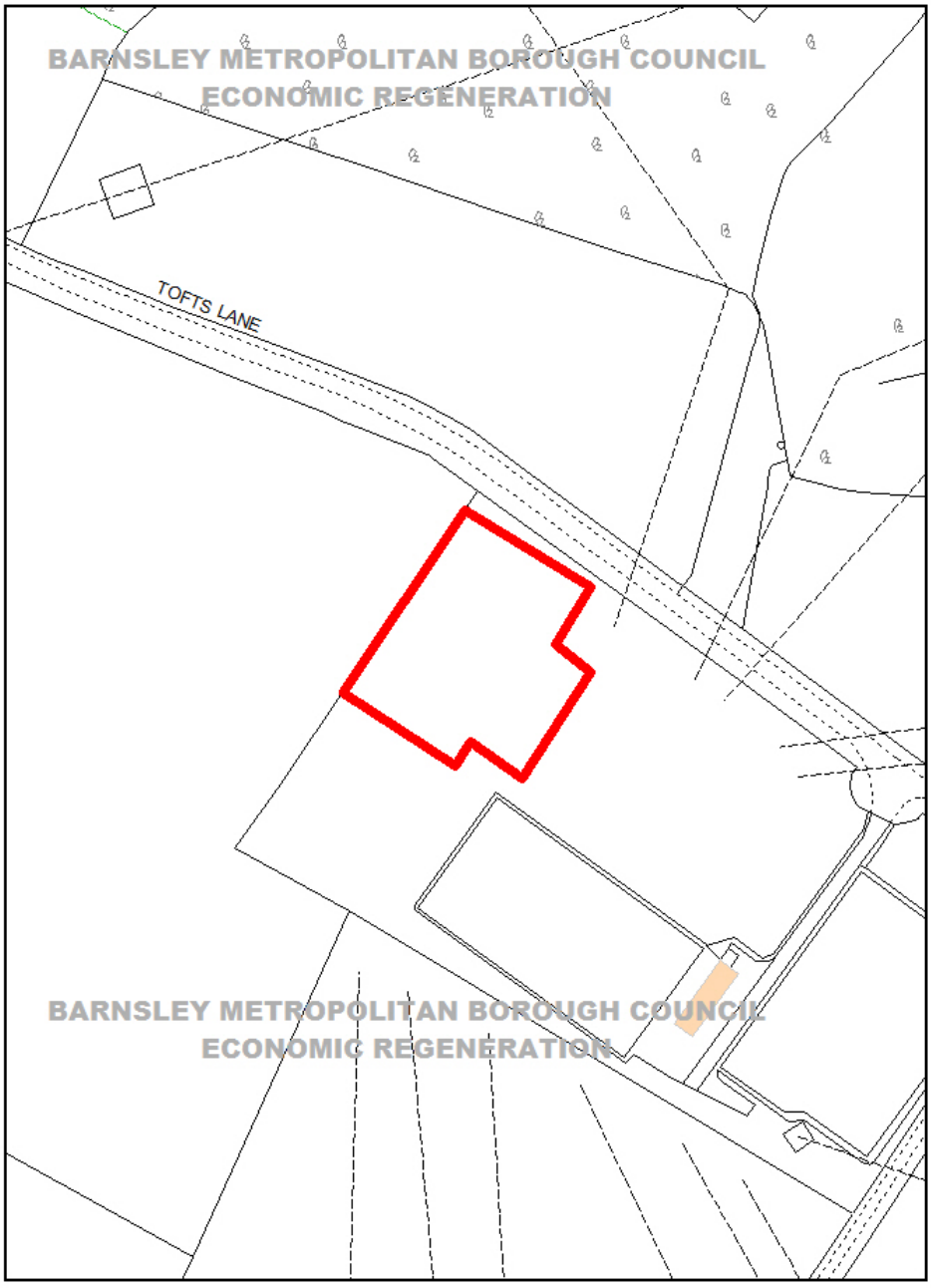
6 No development shall take place, including any works of demolition, until a Construction Method Statement has been submitted to, and approved in writing by, the Local Planning Authority. The approved Statement shall be adhered to throughout the construction period. The Statement shall provide for:
-The parking of vehicles of site operatives and visitors
-Means of access for construction traffic
-Loading and unloading of plant and materials
-Storage of plant and materials used in constructing the development
-The erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate
-Wheel washing facilities
-Measures to control the emission of dust and dirt during construction
-Measures to control noise levels during construction
Reason: In the interests of highway safety, residential amenity and visual amenity and in accordance with Core Strategy Policy CSP 26, New Development and Highway Improvement, and CSP 29, Design.

7 Notwithstanding the Ecology Report and Layout Plan, prior to commencement of development full details of measures to mitigate and enhance biodiversity on the site, including a timetable for their implementation, shall be submitted to and approved in writing by the Local Planning Authority. The development shall be implemented in accordance with the approved details.
Reason: To conserve and enhance biodiversity in accordance with Core Strategy Policy CSP 36.

8 All planting, seeding or turfing comprised in the approved landscaping schem as shown on Layout Plan V1.3 shall be carried out in the first planting and seeding seasons following the occupation of the buildings or the completion of the development, whichever is the sooner; and any trees or plants which die within a period of 5 years from the completion of the development, are removed, or become seriously damaged or diseased shall be replaced in the next planting season with other of similar size and species.
Reason: In the interests of the visual amenities of the locality and in accordance with Core Strategy Policy CSP 36, Biodiversity and Geodiversity.

9 The batteries and associated infrastructure hereby approved shall be removed from the site and the land restored to agricultural use on the expiration of 25 years from the date the batteries are first brought into use.
Reason: To minimise visual impact and to protect the openness of the Green Belt in accordance with Core Strategy Policy CSP34.

PA reference :- 2017/0624



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