NatPower

Brant Battery Energy Storage

Planning, Design and Access Statement

Final report
Prepared by LUC
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NatPower

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Planning, Design and Access Statement

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Chapter 1
Introduction

1.1 This Planning Design and Access Statement (PDAS) has been prepared by LUC on behalf of Navenby Energy Limited ("The Applicant"), a special purpose vehicle of NatPower UK Limited ('NatPower').

1.2 The PDAS supports an application to North Kesteven District Council (NKDC) for planning permission under the Town and Country Planning Act 1990[1]. The application is to construct and operate an energy storage system known as Brant Energy Storage (the 'Proposed Development). The Proposed Development would have a capacity of circa 1GW of electricity and would be situated on 34.5 hectares (ha) of land approximately 1km from the settlement of Coleby and within the administrative area of NKDC.

1.3 In 2020 changes removed electricity storage (except pumped hydro storage), from the national planning regime (Nationally Significant Infrastructure Projects (NSIP) regime) under the Planning Act 2008[2] in England and Wales. As such, this planning application is submitted to the Local Planning Authority (LPA).

The Proposed Development

1.4 The Proposed Development comprises the construction of a Battery Energy Storage Scheme and associated infrastructure known as Brant Energy Storage. The description of development is:

'*Development of an energy storage scheme with associated infrastructure, engineering works and landscaping*.'

1.5 A detailed description of the Proposed Development is included within Chapter 2 including its construction and operation. The 'Block Plan' (P01.02) illustrates the layout of the Proposed Development.

The Applicant

1.6 Brant Energy Storage is being developed by Navenby Energy Limited, a special purpose vehicle of NatPower UK Limited ('NatPower').

1.7 NatPower is at the forefront of developing renewable energy technologies and is committed to supporting the UK Government's commitment to decarbonise the energy network

[1] UK Government (1990) Town and Country Planning Act 1990. Available at https://www.legislation.gov.uk/ukpga/1990/8/contents Accessed 20th March 2025

[2] UK Government (2008) Planning Act 2008 Available at https://www.legislation.gov.uk/ukpga/2008/29/contents Accessed 20th March 2025

by 2035 and reach net zero by 2050. Their mission is to contribute to the development of green energy generation to improve the environment, quality of life and the future.

1.8 NatPower are developing a portfolio of energy storage systems to meet the challenges associated with a transition to renewable energy. NatPower has multiple projects at various consenting stages across the UK and in Italy and Poland.

Pre-Application

1.9 A pre-application request was submitted in October 2024 to NKDC in respect of the proposed installation of a BESS together with ancillary infrastructure, equipment, formation of access and landscaping works on the Site (ref: 24/1284/ADVICE).

1.10 A pre-application written response was received from NKDC on the 27th February 2025. The key points from the pre-application response are summarised in Chapter 6.

Supporting information

1.11 This PDAS should be read in conjunction with the plans, drawings and technical information which has been submitted in support of the Proposed Development. This includes the table of documents set out in Table 1 of the cover letter.

Structure of this Planning, Design and Access Statement

1.12 This report constitutes the PDAS which has been produced to accompany the planning application for the Proposed Development. The following chapters are structured as follows.

- Chapter 2 sets out the Site context and specific details of the development proposal.
- Chapter 3 sets out the need for development.
- Chapter 4 details the site selection process.
- Chapter 5 provides detail in relation to the cable route and connection to the proposed National Grid Electricity Transmission (NGET) Navenby substation.
- Chapter 6 comprises the design and access statement of the planning application.
- Chapter 7 considers the planning policy context related to the Proposed Development.
- Chapter 8 focuses on the appraisal of planning policy and how the Proposed Development accords with policy.
- Chapter 9 presents the conclusions and summary.

1.13 The following appendices are submitted in support of this PDAS:

- Appendix A Location Plan
- Appendix B Site Layout
- Appendix C Site Selection Figures
- Appendix D Expanded Cumulative Schemes
- Appendix E List of other BESS schemes without cable route

Chapter 2
The Proposed Development and Site Context

2.1 This section provides a description of the Proposed Development, together with details regarding its construction and operation. When reading this section, reference should be made to the planning application drawings in addition to the Design and Access Statement (DAS) provided in Chapter 5 of this document.

The Proposed Development

Site Location and description

2.2 The Site lies within the administrative boundary of North Kesteven District Council (NKDC), located approximately 1 km from the settlement of Coleby.

2.3 The Site is accessed from Hill Rise. It is bound to the north by Hill Rise and by field boundaries comprising native trees and hedgerows to the east and south-east. The Site's south-western and western boundaries are generally open and feature adjacent drainage ditches.

2.4 The Site comprises arable land and includes three fields within the eastern part of the Site and one larger field in the western part.

2.5 The Site is generally flat, gently sloping from east to west. It is located 1.2km to the west of the Lincoln Cliff limestone escarpment in a low lying area.

2.6 The Site is surrounded by countryside predominantly comprising arable land with field boundaries marked by drainage ditches, hedgerows and woodland.

2.7 The settlements of Coleby and Boothby Graffoe are located 1km and 1.6km respectively to the east and south-east of the Site. Scattered farmsteads and agricultural buildings surround the Site, with Low Fields Farm (non-residential) 600m to the north. There are residential receptors at Lowfields Farm House 700m to the south, at Somerton Castle 800m to the south and to the east at The Old Cowshed (700m) and Edge Of Coleby (1km).

2.8 There are Public Rights of Way (PRoW) in the surrounding area. PRoW Cole 4/1 is routed adjacent to the eastern boundary of the site and runs from Hill Rise towards Castle Lane in the south. On the approach to Castle Lane, the

PRoW runs close to Somerton Castle (as BooG 6/1) before following Castle Lane to Boothby Graffoe (as BooG 4/2).

2.9 The Viking Way long-distance footpath runs along the Lincoln Cliff in a north to south orientation and is 1.2km from the Site at its closest point.

2.10 With regards to designated heritage assets, Somerton Castle Scheduled Monument lies to the south-west and Coleby Conservation Area to the north-east.

2.11 The Site is located 4.7km north-west of the settlement of Navenby.

2.12 The Brandts Plantation Local Wildlife Site (LWS) is approximately 1.2km to the north of the Site. There are no internationally designated sites within a 20km radius nor any nationally designated sites within a 2km radius.

Development Overview

2.13 The Proposed Development is for an energy storage scheme with associated infrastructure, engineering works and landscaping. The Proposed Development would have a storage capacity of c. 1GW. The operational life of the scheme will be 40 years after which it will be decommissioned. The construction will take place over the course of between 18-24 months.

2.14 The Site boundary is illustrated on the Site Location Plan and covers an area of 34.5 hectares.

2.15 The Proposed Development will include the following components:

- 1,346 battery energy storage units, each 12.3m x 3.1m x 2.4m in size, housing the battery blocks, inverters, heating, ventilation and transformers;
- Power conversion systems, each 12.2m x 3m x 2.4m in size;
- 400kV HV customer substation up to 10.3m in height, six transformers with associated customer switchgear and enclosure walls, control room and storage container for spare parts;
- The above infrastructure components to be located on four level platforms across the Site;
- Columns for the infrared security lights and CCTV system up to 4m in height;
- Internal access tracks approximately 5m in width;
- Underground electrical cables to connect to the Proposed Development's substation;
- A perimeter metal palisade fence around the platforms up to 2.7m high;
- Landscape planting and biodiversity enhancement measures illustrated by the Illustrative Landscape Strategy Plan;
- Vehicular access from two points on Hill Rise.

2.16 The battery energy storage units and supporting infrastructure will generally be contained in metal containers (similar in scale to shipping containers) to be coloured moss or olive green. The exception to this will be the transformers and other substation infrastructure.

Grid Connection

2.17 The Proposed Development will be connecting into the nearby proposed National Grid Electricity Transmission (NGET) Navenby substation. The NGET Navenby substation will be the 'Point of Connection' for the Proposed Development to the wider electricity transmission network. The NGET Navenby substation will form part of a separate planning application.

2.18 Grid connection from the Proposed Development to the NGET Navenby substation is expected via an underground cable. The exact routeing and method of construction is not yet determined but a working width of 100m from the Site to the Point of Connection is assumed. The indicative cable route is detailed in Appendix D. The cable route will be subject to a separate planning application and will include an accompanying Environmental Impact Assessment (EIA).

Site Context

2.19 The Site contains no statutory designations.

2.20 The closest residential properties to the Site are:

- the scattered farmsteads around the Site, including Lowfields Farm House c.700 m to the south, Somerton Castle c.800 m to the south, and to the east, The Old Cowshed and Edge of Coleby at c.700 m and c.1 km respectively.
- the settlements of Coleby and Boothby Graffoe located c.1 km to the east and c.1.6 km to the south-east of the Site respectively.

2.21 There are a number of sensitive receptors in proximity to the Site:

- Landscape – The Site is located c.1.2 km to the west of the Lincoln Cliff limestone escarpment which is a locally designated Area of Great Landscape Value (AGLV).
- Public Rights of Way (PRoW) – Several PRoWs can be found in the local area including Cole 4/1, adjacent to the eastern boundary of the site and runs from Hill Rise towards Castle Lane in the south. Additionally, the

PRoW runs close to Somerton Caste (Boog 6/1 and BooG 4/2).

- Footpaths – The Viking Way long-distance footpath runs along the Lincoln Cliff in a north to south orientation and is located c.1.2 km from the Site at its closest point.
- Priority Habitat – Deciduous woodland located c.190 m north of the Site, wood-pasture and parkland c.890 m to the north-east of the Site.
- Wildlife Site – The Brandts Plantation Local Wildlife Site (LWS) is located c.1.2 km to the north of the Site.
- Minerals – The Site is located approximately 650m to the west of the Limestone Minerals Safeguarding Area and 200m to the east of a Sand and Gravel Area of Search.
- The 'Petroleum Exploration Development Licence (PEDL) Block' extends approximately 60m south of the northern section of the Site boundary, running east to west on a slight south western trajectory across the Site.

Landscape

2.22 The Site is located c.1.2 km to the west of the Lincoln Cliff limestone escarpment which is a designated Area of Great Landscape Value (AGLV).

2.23 The North Kesteven Landscape Character Assessment (NKLCA)[3] identifies the settlements along the AGLV, and countryside in between the settlements as forming the Lincoln Cliff Landscape Character sub-area of the Lincoln Cliff Regional Landscape Character Type. The NKLCA identifies the scarp slope as a dramatic topographical feature in the context of the wider District, with church towers and spires from the villages providing prominent features on the skyline along the AGLV. The ridge, church towers and spires provide the backdrop to much of the Witham and Brant Vales landscape character sub-area.

2.24 The 2007 NKLCA identifies that the Site sits towards the eastern edge of the Witham and Brant Vales landscape character sub-area of the Trent and Witham Vales Regional Landscape Character Type. The NKLCA sets out that the sub-area is defined in the east by the base of the Lincoln Cliff scarp slope and identifies that key characteristic of the sub-area are, amongst other things, the extensive low lying, generally flat valley of twin rivers Witham and Brant running from the south to north east of the sub-area, which has an absence of pronounced landform or topographical variation; limited tree cover but which has a disproportionately high influence on the landscape as the level terrain allows hedgerow and copse trees to foreshorten views across the vale, often allowing a strong band of tree and hedge between land and the large skies; low impact from roads; and prominent overhead high and low voltage transmission lines.

2.25 The NKLCA identifies that pressures for change in the Vale predominately relate to minerals operations, intensive agricultural practice and associated development, and to flood alleviation works; and that there is widespread evidence of historic field boundary loss, particularly in the east. The existing overhead high and low voltage transmission lines, along with large scale agricultural development, are identified as landscape detractors.

Heritage

2.26 The Site itself is generally flat and low lying, at approximately 16m AOD. The designated assets that are clustered within the settlements of Coleby, Boothby Graffoe, Harmston and Navenby represent the main settlement centres during the post-medieval period on the elevated land atop the limestone escarpment to the east of the Site. During this time, the landscape surrounding the Site was characterised by small settlements within a rural landscape, a characteristic that is still evident today.

2.27 The Site contains no statutory designations. There are 52 designated heritage assets within the 3km study area. These include:

The scheduled monument of the late 13th century Somerton Castle (NHLE ref. 1005015).

- Two Grade I listed circular tower bases dating to the 14th century which partially survive, one at the corner of the original castle walls at the south-west corner (NHLE Ref: 1061975) and the other at the north-western corner (NHLE Ref: 1360511).
- A Grade I listed L-shaped structure to the northwest of the castle dating to the late 16th and 19th centuries (NHLE Ref: 1061974).

2.28 These assets are located approximately 800m south-west of the Site.

Coleby

- The Grade II* listed Coleby Hall (NHLE ref. 1000973)
- The Grade II registered park and garden (RPG)
- The Coleby Conservation Area, which contains 11 listed buildings, located approximately 870m north-east of the Site.

[3] North Kesteven District Council (2007(North Kesteven Landscape Character Assessment. Available at https://www.n-kesteven.gov.uk/sites/default/files/2023-01/north_kesteven_landscape_character_assessment_report.pdf

Boothy Graffoe

- Boothby Graffoe Conservation Area and associated six grade II listed buildings located 1.7km south-east of the Site.

Harmston

- Harmston Conservation Area and associated two grade II* listed buildings of All Saints Parish Church (NHLE ref. 1164892) and Harmston Hall Hospital (NHLE ref. 1317567) and 12 grade II listed buildings (NHLE refs. 1061983, 1061984, 1061985, 1061986, 1061987, 1061988, 1061989, 1164885, 1164908, 1164912, 1164917, 1317571).
- Harmston is located c. 2.5km north-east of the site.

Navenby

- Navenby Conservation Area and associated one grade I listed Church of St Peter (NHLE ref. 1147458) and ten grade II listed buildings (NHLE refs. 1061880, 1061882, 1061883, 1147517, 1147533, 1308493, 1360542, 1360543, 1360544, 1360546). These are the assets that lie within the 3km study area only, there are further the south outside of the study area.
- Navenby is located c. 3km south-east of the Site.

2.29 There is one non-designated asset within the Site: an unnamed farmstead which is located in the north-eastern corner (LHER ref. MLI124812). This is a probable 19th century farmstead, now demolished but was identified from historic mapping as part of the Greater Lincolnshire Farmstead Project17, comprising a T-shaped plan with a courtyard and an additional outbuilding to the north.

2.30 Two findspots have been recorded from within the Site, consisting of a sherd of Torksey ware pottery (LHER Ref: MLI82433) dating from between the 9th to 11th centuries,18 and a pottery sherd dating from the medieval period (MLI82438).

2.31 Historical aerial imagery suggests that the Site has been used extensively for agricultural purposes over several decades, as indicated by observable ploughing patterns and minimal field margins.

Ecology

2.32 The Brandts Plantation Local Wildlife Site (LWS) is approximately 1.2km to the north of the Site. There are no internationally designated sites within a 20km radius nor any nationally designated sites within a 2km radius.

2.33 There is a Priority Habitat for deciduous woodland approximately 0.19km to the north of the Site, and a Priority Habitat for wood-pasture and parkland approximately 0.89km to the north-east of the Site.

2.34 The ecological baseline conditions of the Site are summarised below with these recorded during a Preliminary Ecological Appraisal (PEA)[4] undertaken in July 2024:

- **Internationally Designated Sites:** there are no Special Areas of Conservation (SAC), Special Protection Areas (SPA) or Ramsar sites within a 20km radius of the Site.
- **Nationally Designated Sites:** there are no Sites of Special Scientific Interest (SSSI) or National Nature Reserves (NNR) within 2km radius of the Site.
- **Local Wildlife Sites:** there is one wildlife site of local importance within the 2km radius which is Brandts Plantation Local Wildlife Site located approx. 1.21km north-west of the Site. It is noted as being a plantation woodland with diverse ground flora and supporting a range of bird and invertebrate species.
- **Priority Habitats:** The desk study identified two Priority Habitats within 1km of the Site. These are deciduous woodland, closest approx. 0.19km north of the Site, and wood-pasture and parkland, closest approx. 0.89km north-east of the Site.
- **Ancient Woodland:** the desk study did not identify any parcels of ancient woodland 1km of the Site boundary.
- **Habitats:** onsite habitats are dominated by cereal crop fields. These are surrounded by arable field margins with other neutral grassland. This comprises species such as smooth meadow grass (Poa pratensis), perennial rye grass (Lolium perenne), Yorkshire fog (Holcus lanatus), red clover (Trifolium pratense), false oat grass (Arrhenatherum elatius), bird's foot trefoil (Lotus corniculatus), knapweed (Centaurea nigra), cut leaved crane's-bill (Geranium dissectum) and dandelion (Taraxacum agg.). The fields are bound by native hedgerows, predominately hawthorn (Crataegus monogyna) and blackthorn (Prunus spinosa), with a number of these containing trees and adjacent ditches.
- **Protected and/or notable species:** the PEA noted that the Site had habitats and features suitable for supporting a number of protected and/or notable species.

[4] Tetra Tech (2024). Navenby Energy Storage System Preliminary Ecological Appraisal. Tetra Tech, Leeds, UK.

Flood Risk

2.35 The Site is located within the River Brant catchment in the Brant – Lower Water Framework Directive (WFD) river water body catchment[5], which is classified as being heavily modified. This is within the wider Witham Upper Operational Catchment. The River Brant is located approximately 1.3km west of the Site.

2.36 There are no lakes or ponds within the Site. Many drains are also present along field margins throughout the local area, with one present within the north-east of the site and two along the northern and southern boundaries.

2.37 The Site lies 600m outside (east) of the Upper Witham Internal Drainage Board district. Runoff from the Site would eventually discharge to this area through field drains connecting to the River Brant.

2.38 The Environment Agency (EA) Flood Map for Planning[6] indicates that no part of the Site is located within fluvial Flood Zones 2 or 3.

2.39 The limit of Flood Zone 2 associated with the River Brant is approximately 500m west of the Site boundary. The flood zone associated with a tributary of the Brant is approximately 300m southwest of the Site at its closest point. Due to the pattern of topography in the local area sloping from east to west, the Site is not expected to be at risk during a fluvial flood event due to it being located east of the fluvial flood zones.

Highways and Transport

2.40 The Site is served by Hill Rise, which is a two-way road subject to a derestricted (60mph) speed limit. Hill Rise is a rural lane and is therefore subject to single way working along much of its length, with passing bays provided intermittently at the points where access to the fields which flank Hill Rise are provided.

2.41 The local highway network comprises a series of minor (B, C and unclassified) and major A-roads and .

Planning History

2.42 There is no relevant planning history related to the Site.

[5] DEFRA (2025) Brant – Lower Water Body. https://environment.data.gov.uk/catchment-planning/WaterBody/GB105030056770 Accessed: Feb 2025.

[6] Environment Agency (2021) Get flood risk information for planning in England. https://flood-map-for-planning.service.gov.uk/ Accessed: Feb 2025.

Chapter 3
Need for Development

3.1 This Chapter sets out the need for development in the current ecological and economic context of the UK.

UK and England Climate Change and Renewable Energy Legislation and Policy

UK Government Climate Emergency

3.2 In May 2019, following the Inter-Governmental Panel on Climate Change (IPCC), the UK Government declared an Environmental and Climate Change Emergency. This declaration required a commitment to avoid a rise of more than 1.5°C in global temperature. To achieve this, global emissions are required to fall by approximately 45% by 2030 from the 1990 levels.

3.3 A target for the UK to be net-zero by 2050 was legally set out in June 2019 under the UK Climate Change Act 2008 (2050 Target Amendment) Order 2019[7]. This amended the previous legal 2050 target to reduce Greenhouse Gas (GHG) emissions from 80% to 100% below the 1990 levels, otherwise referred to as net-zero. By this declaration, the UK Government recognises a duty to combat climate change, as well as an opportunity to lead the way in green and sustainable economic opportunities and a future low carbon economy.

Clean Power 2030 Action Plan

3.4 The Clean Power 2030 Action Plan sets out that achieving clean power is now a broader goal, key to a growing economy, our national security and improving our standards of living. Clean power by 2030 is our next milestone, but it requires us to act with much greater urgency.

3.5 Grid scale and small-scale batteries can offer short duration flexibility (currently typically a maximum of two hours' continuous supply of electricity without recharge).

3.6 The Action Plan outlines that batteries can be used to store electricity when it is plentiful and low cost, such as during low demand periods when wind and solar output is high, for use when electricity generation is less plentiful or during times of peak electricity demand. Batteries can reduce the amount of generation and associated network that needs

[7] HM Government (2008) The Climate Change Act 2008. Available at https://www.legislation.gov.uk/ukdsi/2019/9780111187654

to be built to meet peak demand, helping Britain reach clean power in a cost-effective way and reducing delivery risk associated with other types of energy infrastructure.

3.7 The Clean Power 2030 Action Plan outlines that an increase in battery storage is needed by 2030 to support clean power. The government expects the majority of this increase to come from grid-scale batteries, with small-scale batteries also making a contribution.

Path to Net Zero

3.8 The UK Government has adopted a suite of policies to reach net zero, set out in two strategy publications: the Net Zero Strategy: Build Back Greener (2021)[8] and Powering Up Britain: The Net Zero Growth Plan (2023)[9].

3.9 The Net Zero Strategy sets out the government's vision for a market-led, technology- driven transition to decarbonise the UK economy and reach net zero by 2050.

3.10 Build Back Greener sets out key policies pertinent to delivering a net zero economy and sets out a clear aim of a dully decarbonised power system by 2035.

3.11 Powering Up Britain sets out the plan for the accelerated deployment of renewables, with a goal of 50GW of offshore wind by 2030 and a five-fold increase in solar electricity generation to 70GW by 2035. These low-cost renewable energy sources supply growing amounts of intermittent electricity, so it is critical that this deployment is matched by technologies which balance the electricity network which include battery storage. The government has said a decarbonised power system will need to be supported by technologies that can respond to fluctuations in supply and demand, including energy storage. The government expects demand for grid energy storage to rise to 10 gigawatt hours (GWh) by 2030 and 20GWh by 2035[10].

3.12 In 2024, the Labour government announced several new bills that are relevant to net zero, including the Great British Energy Bill[11]. This bill sets out the Governments response to energy insecurity which they state can only be responded to through 'homegrown clean energy'. The Great British Energy Bill ("the Bill") helps to establish Great British Energy as a publicly-owned and operationally independent energy company, setting out its primary objectives of facilitating, encouraging and participating in the production, distribution, storage, and supply of clean energy.

Carbon Budget

3.13 The Sixth Carbon Budget, required under the Climate Change Act, provides ministers with advice on the volume of greenhouse gasses the UK can emit during the period 2033-2037[12].

3.14 The Sixth Carbon Budget report sets out that the UK requires a significant expansion of low-carbon generation, in particular low-cost renewables and decarbonised back-up generation, in conjunction with more flexible demand and use of storage to reduce emissions from electricity generation to near zero. The report states that a more flexible electricity system will help balance out the variability in renewable generation which can be achieved through supply e.g. the use of electricity storage.

Climate Change Committee: 2024 Progress Report to Parliament

3.15 This statutory report provides a comprehensive overview of the UK Government's progress to date in reducing emissions[13]. The committee's 2024 Progress Report said that the new government "will have to act fast to hit the country's commitments".

3.16 The report notes that EV battery cell prices have fallen rapidly and have historically tracked ahead of CCC assumptions. Despite supply chain disruptions causing prices to rise in 2022, they have fallen steeply again in 2023 and are therefore assessed as being on track. Reductions are expected to continue, which will play a key role in making electric vehicles, and grid-level storage, more cost-effective.

Powering Up Britain: Energy Security Plan (2023)

3.17 This plan sets out the steps the government is taking to ensure the UK is more energy independent, secure and resilient[14].

[8] HM Government (2021) Net Zero Strategy: Build Back Greener. Available at: https://assets.publishing.service.gov.uk/media/6194dfa4d3bf7f0555071b1b/net-zero-strategy-beis.pdf
[9] HM Government (2023) Powering Up Britain: Net Zero Grown Plan. Available at: https://www.gov.uk/government/publications/powering-up-britain/powering-up-britain-net-zero-growth-plan
[10] House of commons Library (2024) 'Battery energy storage systems (BESS)'. Available at: https://commonslibrary.parliament.uk/research-briefings/cbp-7621/
[11] House of Commons Library (2024) 'The UK's plans and progress to reach net zero by 2050' Available at: https://commonslibrary.parliament.uk/research-briefings/cbp-9888/
[12] Climate Change Committee (2020) Sixth Carbon Budget. Available at: https://www.theccc.org.uk/publication/sixth-carbon-budget/
[13] Climate Change Committee (2024) 2024 Progress Report to Parliament. Available at: https://www.theccc.org.uk/publication/progress-in-reducing-emissions-2024-report-to-parliament/
[14] Department for Energy Security and Net Zero (2023) Powering Up Britain: Energy Security Plan. Available at: https://www.gov.uk/government/publications/powering-up-britain/powering-up-britain-energy-security-plan

3.18 The Report is focused on changing decades of reliance on imported fossil fuels, by reducing demand and boosting home grown energy, giving energy resilience the priority it deserves by investing in renewables and nuclear, to power Britain from Britain.

3.19 This plan confirms that battery energy storage is central to the successful delivery of this strategy.

UK Battery Strategy[15] (2023)

3.20 This strategy sets out that batteries will play an essential role in our energy transition and our ability to successfully achieve net zero by 2050. High capacity and reliable rechargeable batteries are a critical component of many devices, modes of transport, and our evolving energy generation capability.

3.21 Batteries are essential products in modern, industrialised economies. In recent years, they have grown in importance as they underpin many of the technologies that will enable the transition towards net zero. They are a vital component in personal and commercial transportation, including hybrid and fully electric cars, buses, vans, and lorries.

3.22 Grid-scale BESS enable electricity to be used more flexibly and decarbonise the energy system in a cost-effective way. Batteries are also important to the UK's national security and underpin the UK's ability to develop innovative defence capabilities - including communication systems, fighter jets and nuclear submarines.

3.23 The Government's 2030 vision is for the UK to have a globally competitive battery supply chain that supports economic prosperity and the net zero transition. Grid-scale BESS enable us to use electricity more flexibly and decarbonise the energy system in a cost-effective way.

Energy White Paper: Powering our Net Zero Future (December 2020)

3.24 This paper published under the 2019 to 2022 Johnson Conservative government. Following the then Prime Minister's Ten Point Plan for a 'Green Industrial Revolution', this policy paper highlights the absolute necessity of fighting this climate change, putting 'Net Zero' at the forefront of the government agenda.

3.25 The paper sets out the flexibility provided by battery storage in meeting demand for energy.

Assessment of need for the development

3.26 Energy storage systems are required to support the UK's transition to renewable energy. In accordance with the legislation and policy referred to above, there is a significant need and political willingness to increase the amount of renewable energy produced in the UK and for energy storage to support it. The Proposed Development will deliver 1GW of energy storage which will provide a significant supporting step towards meeting legislated renewable energy generation targets and those set out in national energy policy.

3.27 Energy storage systems provide vital flexibility to the electricity network. They support the buildout of renewables by enabling more renewable energy to be stored and then discharged during periods of peak demand. This enhances grid stability and maximises the uses of renewable energy sources.

3.28 Energy storage systems will assist with the reduction in the curtailment of renewable energy generators. Curtailment occurs when renewable energy sources like wind and solar produce more electricity than the grid can accommodate, leading to the shutdown of these generators. This situation arises due to limitations in transmission capacity or insufficient storage solutions.

3.29 In 2023, curtailment costs in the UK reached approximately £920 million, primarily due to the need to shut down wind farms in Scotland and activate gas power plants in England and Wales to meet demand[16].

3.30 These costs are passed on to consumers, contributing to higher electricity bills. Furthermore, curtailment simply leads to the loss of renewable energy meaning that gas peaking plants must be used instead. This not only increases carbon emissions versus renewable energy generators but is more costly.

3.31 The Proposed Development will make a significant contribution towards the UK's national energy policy aims of reducing carbon emissions, improving energy security, flexibility and affordability by:

- Delivering 1GW of energy storage which will provide a significant supporting step towards meeting legislated renewable energy generation targets and those set out in national policy;
- Strengthen the security, flexibility and resilience of the energy system and the National Grid and support the

[15] Department for Business and Trade (2023) UK Battery Strategy. Available at:https://assets.publishing.service.gov.uk/media/656ef4871104cf000dfa74f3/uk-battery-strategy.pdf

[16] Current (2024) Field: Battery energy storage could slash curtailment costs by 80% annually. Available : https://www.current-news.co.uk/field-battery-energy-storage-could-slash-curtailment-costs-by-80-annually/?utm_source=chatgpt.com

energy transition and growth of renewable power generation;

- Providing a large scale, low carbon, battery storage asset to contribute towards achieving Net Zero by 2050.

Chapter 4
Site Selection

4.1 This Chapter of the PDAS outlines the approach and method adopted by NatPower to identify the Site for the Proposed Development. Further detail can be found in Chapter 3 of the ES.

Grid Connection

4.2 It is widely acknowledged that one of the greatest barriers to the rollout of renewable energy is the finite grid capacity. Renewable energy, by its nature, is more dispersed across the country, known as a decentralised energy system. This means that there is a need for new transmission stations, overhead lines and additional infrastructure to allow renewable energy projects to connect to the transmission and distribution networks. Energy storage plays an important role in providing additional capacity and flexibility to the grid.

Site Selection Methodology

Initial Site Identification

4.3 The selection of a site for an energy generation or storage project is a complex process. It involves assessing several technical, commercial, environmental and planning criteria to identify a suitable site.

4.4 NatPower have a structured and consistent approach to site identification and delivery across the UK, that aims to address and create solutions regarding grid connection challenges. NatPower site selection process includes searching for land along existing transmission overhead lines for renewable energy and storage development. Where there is sufficient distance between existing transmission substations and an appropriate energy generation or storage development, National Grid is legally obliged support the delivery of and operate a transmission substation. NatPower's site selection methodology includes identifying sites that can accommodate transmission substations, to address the grid connection challenges, and energy generation and storage development.

4.5 For this project, the initial site search identified a potential opportunity along the Bicker Fen - Spalding North – West Burton 400kV overhead line, specifically between the West Burton 400kV substation and the Bicker Fen 400kV substation. A site (which has become the Site) was thereafter identified for energy storage development and a transmission

substation. This site search was the initial reason that the Site was selected for consideration for the project.

4.6 In parallel, National Grid were undertaking its own site search analysis along the same 400kV overhead line. When it became public knowledge that National Grid were proposing a transmission substation, this element of the Brant project was not progressed further by NatPower. From this point, the project became exclusively a Battery Energy Storage System (BESS) project.

4.7 National Grid has identified a site for the proposed 400KV AIS National Grid Electricity Transmission (NGET) Navenby Substation at land off Heath Lane in Navenby, c.4.5km to the south-east of the Site. The NGET Navenby Substation is proposed to meet the requested demand from new power connections, which may include Fosse Green Solar Farm and Leoda Solar Farm, amongst other developments.

4.8 The NGET Navenby Substation will be the Point of Connection for the Proposed Development.

4.9 The NGET Navenby Substation is at Scoping stage. North Kesteven District Council (NKDC) have confirmed that the project would be EIA development in their Screening Opinion. A planning application is to be submitted in Autumn 2025. This planning application will be subject to its own separate review and determination by NKDC in accordance with legislation, the development plan and other material considerations. The programme on the National Grid project website for the NGET Navenby Substation anticipates a planning decision in Spring 2026, construction commencing in 2026, and the substation to be complete in late 2029[17].

4.10 Having established the likely availability of capacity on the grid network and following initial consultation with National Grid, an application to secure a formal grid connection offer was submitted to National Grid and subsequently secured.

4.11 The Proposed Development has secured a grid connection offer as shown by the National Energy System Operator Transmission Entry Capacity (TEC) register (project number PRO-005006)[18]. The TEC Register is controlled by National Energy System Operator (NESO) who are owned and managed by Central Government. The inclusion of the Proposed Development on the TEC Register is evidence that a grid connection agreement has been secured for the Proposed Development.

Site Selection Assessment

Proximity to Grid Connection

4.12 When the location of the NGET transmission substation was made public, NatPower undertook an alternative site assessment set upon a 10km radius from the transmission substation. The reason for this renewed site search was multifaceted.

4.13 First, it was essential to the performance and impact of the Proposed Development that it is sited as reasonably close to its Point of Connection as possible. There are three fundamental reasons of equal importance for this:

1. The further the distance from the BESS site to the Point of Connection, the greater the environmental impact created by the cable route.
2. A shorter distance is preferred to facilitate efficient energy transfer and reduce transmission losses.
3. A shorter distance makes the scheme more economically viable to build as the cost of the cable corridor between the asset and the Point of Connection increases in cost the greater the distance.

4.14 Therefore, sites closer to the Point of Connection have been preferred over sites at a greater distance, even when they have comparable considerations, impacts and benefits.

4.15 A systematic process was completed to evaluate alternative sites. A 10km radius search (the Point of Connection being at the centre) was used with key environmental parameters considered. To support the site selection assessment, supporting Figures were produced as detailed in Appendix C.

4.16 This process sought to determine whether there were any sequentially preferable sites on lower quality agricultural land and previously developed land, within a 10km radius of the proposed grid connection point. A search radius of 10km was selected as being sufficient to ensure a range of potential options could be considered.

Brownfield Land

4.17 No brownfield land of the size required to facilitate the development was identified within the 10km search radius from the point of connection.

[17] National Grid (2025) Navenby Substation. Available: https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure-projects/navenby-substation

[18] National Energy System Operator (2025) Transmission Entry Capacity (TEC) Register. Available at: https://www.neso.energy/data-portal/transmission-entry-capacity-tec-register/tec_register_-_28_march_2025

4.18 This search was completed using North Kesteven District Council brownfield land register[19].

Designated Heritage Assets

4.19 To identify appropriate sites, a suitable distance was applied between the Proposed Development and designated heritage assets. The designated heritage assets considered were:

- Grade I Listed Buildings;
- Grade II* Listed Buildings;
- Grade II Listed Buildings;
- Scheduled Monuments;
- Conservation Areas;
- Registered Parks and Gardens;
- Historic Landscapes; and
- World Heritage Sites.

4.20 No designated heritage assets were identified in the buffer. Further detail of our assessment can be found in Appendix C.1 Designated Heritage Assets.

Residential Properties

4.21 It is accepted that BESS projects will introduce some noise, albeit at acceptable levels. A 250-metre minimum buffer was applied to ensure no residential property would suffer adverse impacts.

4.22 No residential properties were identified in the buffer. Further detail can be found in Appendix C.2 Residential Properties and Settlement Boundaries.

Designated Landscapes and Public Rights of Way

4.23 Designated landscape assets were avoided by the Site boundary. The 10km search radius identified the Lincoln Cliff Area of Great Landscape Value. Any suitable sites within this designation were avoided.

4.24 Sites that did not have Public Rights of Way (PROWs) within were preferred over sites that did have PROWs within. A PRoW abuts the eastern boundary of the Site, but none of the Site boundary is located within it. Therefore, it was considered appropriate for development.

4.25 Further detail can be found in Appendix C.3 Landscape and Public Rights of Way.

Other Planning Applications

4.26 There are several projects within the designated search radius which have secured land and are advancing their own planning applications. These sites were discounted as the land would not be available.

4.27 Further detail can be found in Appendix C.4 Energy Projects and Planning Applications

Agricultural Land

4.28 In identifying areas that could be suitable for a BESS site, the Applicant considered locations that would avoid best and most versatile agricultural land (BMVAL). In particular, sites with Grade 1 and 2 were avoided.

4.29 To identify Grade 1 and 2 land, the Applicant used the Regional Agricultural Land Classification Maps published on the Natural England website.

4.30 Mapping the 31,400ha of land within the 10km radius, 12,089ha (38.5%) is Grade 2 and 17,790ha (57.3%) is Grade 3 land. There is no Grade 1 land. This means that up to 95.8% of land is or has the potential to be BMVAL.

4.31 Further detail can be found in Appendix C.5 Agricultural Land.

Ecological Constraints and Ancient Woodlands

4.32 These designated sites are afforded high protection in legislation. Therefore, Special Areas of Conservation, Special Protection Areas, Ramsar Sites, Sites of Specific Scientific Importance and National Nature Reserves (NNR) were avoided. Furthermore, Ancient Woodland was also avoided.

4.33 Further detail can be found Appendix C.6 Ecological Constraints

Flood Risk

4.34 Although BESS can be sited in areas of flood risk with suitable mitigation, the site selection process preferred land within Flood Zone 1 over areas in Flood Zones 2 and 3. Areas at risk of surface water flooding were considered, and such sites were taken into consideration.

4.35 Further detail can be found in Appendix C.7 Flood Risk.

Summary

4.36 In conclusion, the initial site selection assessment identified the local area along the Bicker Fen - Spalding North – West Burton 400kV overhead line, specifically between the

[19] North Kesteven District Council, 2025. Brownfield Land Register. Available at: https://www.n-kesteven.gov.uk/planning-building/planning/planning-policy/brownfield-land-register

West Burton 400kV substation and the Bicker Fen 400kV substation, as being appropriate for an energy storage and transmission development. NatPower then became aware of National Grid's intention to bring forward a standalone transmission substation. NatPower thereafter decided to bring forward the standalone BESS development.

4.37 It is considered that the Proposed Development avoids sites which present greater environmental and planning considerations. Furthermore, the point of connection being just over 5km south-east of the Site, means there will be less potential environmental disruption from the construction of the cable route, than sites further away. Appendix C.8 All Constraints demonstrates the lack of alternative sites with fewer environmental considerations located closer to the point of connection.

4.38 No potential sites were identified which are closer to the grid connection than the Proposed Development. Considering the site selection criteria as set out in this Chapter, the Site is considered to be a suitable and available site.

4.39 Further detail about the Proposed Development being acceptable from a national and local planning policy perspective can be found in Chapter 7 and Chapter 8 of this PDAS.

Chapter 5
Cable Route and NGET Navenby Substation

5.1 This Chapter of the PDAS outlines detail relevant to the NGET Navenby substation and the cable route serving the Proposed Development. This Chapter has been prepared in response to comments from NKDC who raised these developments as key matters pertinent to the Proposed Development.

NGET Navenby Substation

5.2 The NGET Navenby substation is a standalone project with its own functional interdependence.

5.3 The NGET Navenby Substation will be the subject of a separate planning application under the TCPA to the Proposed Development. It is located on a site owned and/or promoted by a different applicant (National Grid) and its programme for submission and determination is different to the Brant Energy Storage project.

5.4 The location of the NGET Navenby substation is shown in Appendix D.

Cable Route

5.5 As detailed in Chapter 2, the exact routeing and method of construction is not yet determined but a working width of 100m from the Site to the Point of Connection is assumed. The indicative cable route is detailed in Appendix D.

5.6 The cable route will be the subject of a separate planning application under the TCPA to the Proposed Development. It is located on land owned by different persons to that of the Proposed Development. The cable route planning application will include a supporting EIA.

5.7 The cable route is a standalone project with its own functional interdependence, acting as a means of transmitting energy stored by the Proposed Development.

Legislative and Policy Context

5.8 There is no requirement under the TCPA that applications must be amalgamated as a single application if they could be described as comprising some larger project. The focus of the TCPA, as per Section 55, is whether an application comprises "*development*".

5.9 The Proposed Development will be determined in accordance with the Statutory Development Plan (Local Plan) pertinent to the Site. Other planning policy documents are

material planning considerations of varying weight and importance.

5.10 There is no requirement within the NPPF, NPPG or the NPSs which stipulates that BESS facilities and grid connection infrastructure must be amalgamated into a single application.

5.11 The planning inspector in a recent appeal decision for a battery energy storage facility noted: *"the development of a BESS has one key locational requirement. That is the availability of and proximity to a grid connection. Access to the local grid is the biggest constraint facing the alternative energy supply and associated infrastructure industries. Sites need to be located close to a point of connection (POC) to the grid, so as to minimise the loss of energy during transmission and the grid must have capacity to absorb the electricity discharged at times of peak demand".* (ref: APP/V4630/W/24/3347424, Walsall Metropolitan Borough Council area)

5.12 Securing a grid connection offer is fundamental to the development of a BESS project, making proximity to the proposed grid connection point a critical consideration.

Cumulative Assessment

5.13 The NPSs recognise that a generating station and grid connection may be brought forward separately. In respect of network connections, Section 4.11.8 of NPS EN-1 recognises that:

"*On some occasions it may not be possible to coordinate applications. For example, different elements of a project may have different lead-in times and be undertaken by different legal entities subject to different commercial and regulatory frameworks (for example grid companies operate within OFGEM controls) making it inefficient from a delivery perspective to submit one application. Applicants may therefore decide to submit separate applications for each element. Where this is the case, the applicant should include information on the other elements and explain the reasons for the separate application confirming that there are no obvious reasons for why other elements are likely to be refused."*

5.14 To understand the context of this paragraph, it is important to read the preceding section 4.11.7 which states (amongst other things)

"*The Planning Act 2008 aims to create a holistic planning regime so that the cumulative effect of different elements of the same project can be considered together*."

5.15 Section 4.11.9 provides detail about relevant information to be included for applications that cannot be brought forward together:

"if this option (separate applications) is pursued, the applicant accepts the implicit risks involved in doing so and must ensure they provide sufficient information to comply with the EIA Regulations including the indirect, secondary, and cumulative effects, which will encompass information on grid connections."

5.16 Read together, these paragraphs are concerned with cumulative assessments. Each individual application: the Proposed Development, cable route and NGET Navenby substation, will be subject to their own individual EIA. Therefore, cumulative impacts and other requirements of the EIA Regulations will be considered and appropriately assessed.

5.17 The indicative cable route corridor and NGET Navenby substation is included in the cumulative assessment as part of the EIA reported in the ES accompanying this application. It is reasonable to assume that the cable route application and NGET Navenby substation will consider the Proposed Development as part of their supporting cumulative assessments.

No Obvious Reasons for Refusal

5.18 Paragraph 168 of the NPPF states that; amongst other things, LPAs should "*not require applicants to demonstrate the overall need for renewable or low carbon energy, and give significant weight to the benefits associated with renewable and low carbon energy generation and the proposal's contribution to a net zero future."* It is noted that substations are defined as critical national priority projects by EN-1.

5.19 The second part of NPS section 4.11.8 requires *"no obvious reasons for why other elements are likely to be refused".*

5.20 It is considered, that due to the in-principle use of the cable route and NGET Navenby substation being supported by national and local planning policy, in that they are supporting infrastructure for renewable energy generation and a net-zero future (see Chapter 7), there are no obvious reasons for these applications being refused permission.

5.21 As detailed above, the cable route and NGET Navenby substation will be determined on their own individual merit under the TCPA. It is not the role of this planning application to assess those proposals, although there has been appropriate due regard in terms of the supporting cumulative assessment.

Construction Phasing

5.22 The construction of the Proposed Development is expected to take 18 to 24 months. At the point of completion, it would connect to the National Grid via the proposed Navenby substation as per the accepted grid connection. National Grid anticipates that the Navenby substation will commence construction in mid to late 2026 and be operational by late 2029. Without a grid connection, the Proposed Development

will not come forward, and therefore, construction will only begin once construction of the Navenby Substation is underway. Due to the timescales of the development of Navenby substation, the Proposed Development will commence 9 to 12 months after the commencement of Navenby substation. It is therefore currently estimated that construction of the Proposed Development will start in mid to late 2027.

5.23 Considering the phasing and construction of the Proposed Development, the cable route, and the NGET Navenby substation, the Applicant seeks to agree on a planning commencement condition stating that the Proposed Development must begin no later than five years from the date of any future planning permission being granted (in place of the standard three years).

5.24 The Planning Practice Guidance on the Use of Conditions states with respect to the time limit planning condition that '*A longer time period may be justified for very complex projects where there is evidence that 3 years is not long enough to allow all the necessary preparations to be completed before development can s*tart.'(Paragraph: 027 Reference ID: 21a-027-20140306

5.25 The need for a five year consent is to allow for the Navenby substation planning application to be submitted and determined. If there were any delays in the approval of this project, it could lead to an event where the permission lapses.

5.26 Furthermore, consideration is also needed to provide sufficient time to discharge planning conditions, comply with all other relevant legislative requirements, undertake procurement and mobilise for development.

5.27 For these reasons it is considered that a three-year consent would unfairly prejudice the applicant.

Renewable Energy Benefit

5.28 It is considered that the Proposed Development benefits from the positive weighting normally afforded to renewable energy development. This remains in the absence of the cable route from the proposal and the NGET Navenby substation not yet having planning permission.

5.29 Paragraph 168 of the NPPF and the Local Plan does not stipulate the benefit attached to renewable energy storage or generation development being negatively impacted due to the absence of a cable route to a supporting transmission substation.

5.30 There have been several renewable energy developments, including BESS schemes, that have been approved separately to their cable route. A list of these schemes is detailed in Appendix E.

5.31 Reviewing the Planning Case Officer Reports for the different applications detailed in Appendix E, the exclusion of the cable route is not a matter commented on in detail or at all by the determining LPA. It is clear, therefore, the absence of a cable route from such development does not detract from or reduce the public benefit attached to renewable energy generation and energy storage development.

5.32 As outlined in Chapter 4, National Grid is required to identify, deliver, and operate supporting transmission substations to facilitate renewable energy generating development, provided that grid connections are secured and agreed upon.

5.33 As detailed above, there are no known obvious reasons why the NGET Navenby substation or cable route will be refused, and National Grid have identified that there is a need for a transmission substation in the local area. Therefore, it is considered that the absence of planning consent for the NGET Navenby substation has an inconsequential impact on the weight attached to the Proposed Development benefit.

Chapter 6
Design and Access Statement

6.1 This section of the report includes the Design and Access Statement (DAS) which sets out how the scheme has responded to local issues and context and demonstrates it can be adequately accessed by prospective users. It details how the Proposed Development shall be delivered and the principles that have influenced its design. This DAS has been prepared in consideration of Government guidance on producing DAS[20].

Environmental Sustainability

6.2 The Proposed Development is essential to support a more sustainable future through its contributions to national net zero and local environmental targets.

6.3 Energy storage infrastructure has a key role to play in providing flexibility to the energy system, so that high volumes of low carbon power, heat and transport can be integrated. This development would not generate energy in and of itself, it would facilitate a greater capacity for and use of energy generated by renewable and low carbon energy sources through storage and increased grid flexibility.

6.4 The Local Plan relevant to the Proposed Development emphasises a commitment to supporting the transition to a net-zero future. Other material planning considerations highlight the need for energy storage to reduce electricity system costs and enhance reliability by storing surplus energy during periods of low demand and releasing it when demand is higher.

6.5 Constraints mapping was undertaken as part of the site selection assessment to identify key statutory and non-statutory designations. This is detailed in Chapter 4.

6.6 An ecological baseline of the Site was undertaken and the Site progressed in part due to the avoidance of any European designated sites within 20km, or national designated sites within 2km of the Proposed Development and the Site is of negligible importance to invertebrates.

6.7 The layout of the Proposed Development has been influenced by the aspiration to retain higher value habitats (e.g. hedgerow, ditches, other neutral grassland, trees) where possible and locating the Proposed Development footprint within lower value habitats (e.g. cereal crop). The layout has

[20] Making an application: Design and access statement. GOV.UK. Available at: https://www.gov.uk/guidance/making-an-application#Design-and-Access-Statement (Accessed: 20 March 2025)

also been guided by the retention of linear features to maintain connectivity through the Site to the wider landscape. Planting is proposed at an early stage to provide biodiversity gain.

6.8 Further detail can be found in the supporting Environmental Statement (ES) Chapter 3.

Proximity to available grid capacity

6.9 As detailed in Chapter 4, a key factor for BESS site selection is proximity to its point of connection and securing a grid connection agreement with National Grid.

6.10 The Point of Connection for the Proposed Development is the proposed NGET Navenby substation. The 400KV NGET Navenby substation is being delivered by National Grid, with a planning application planned for submission in autumn 2025. The applicant engaged with National Grid to secure its grid connection agreement. As part of the pre-application engagement for the Proposed Development, NKDC informed the applicant that National Grid are engaging separately with the local authority to inform the NGET Navenby substation application submission.

Rural Location and Community Safety

6.11 Energy storage infrastructure of this size, by virtue of the nature of its proposed use, together with land requirements, is suited to locations away from residential areas and sensitive receptors.

6.12 The Proposed Development is located on private land that is not accessible to the public. Suitable mitigation measures have been proposed to avoid and minimise the risk of harm to the surrounding community because of the Proposed Development.

6.13 Security features including palisade fencing 2.7m high, infra-red lighting and CCTV. Further details about security features can be found on submitted drawing EA_1324-Figure_14_Security Fence and Gate-P01.

Character

6.14 The Site comprises largely flat agricultural fields, with most farmland being used for growing cereals, oilseeds and other arable crops. The design requirements for the Proposed Development's Substation include a sufficient area of flat ground.

6.15 The design of the Proposed Development has undergone an iterative process contributing to a site layout which minimises impact on local character and setting. This has included a series of actions detailed in ES Chapter 3 and below.

Movement to, from and within the development

6.16 With regard to movement to and from the Site, the key issues with all BESS development arise at the construction and decommissioning phases.

6.17 A Transport Statement (TS) and Construction Traffic Management Plan (CTMP) has been prepared in support of this application. The CTMP has been prepared to provide an assessment of the development proposals relating to the construction of the site and has demonstrated the following:

- The local highway network is suitable to accommodate forecast construction and operational traffic.
- A review of the Personal Injury Collision data for the local highway network had not identified any significant patterns of collisions which could be exacerbated by the construction traffic associated with the development proposals.
- Safe and suitable routes are available to the site, avoiding weight restrictions.
- Measures will be incorporated to safeguard the existing PROW located to the east of the site.
- The proposed access arrangements are suitable to allow access by HGVs associated with the construction of the site.
- There is sufficient land available within the red line boundary to accommodate welfare and storage facilities, as well as parking, for construction workers.
- During the temporary 18 to 24 month construction period, it is forecast that there will be approximately of 2,350 to 3,000 HGV construction trips to the site. On average this will equate to approximately 5 to 10 HGV movements per day and up to a maximum of 20 movements when the BESS containers are delivered to the site period.
- Forecast trip attraction indicates that the proposals will not have any observable impact on the local highway network.
- Measures will be incorporated to reduce the impact on the local highway network during the construction phase, in terms of mud and debris.
- Once operational, the site will attract a small number of trips per month, with parking provided within the site.

6.18 During operation, traffic impacts will be minimal.

6.19 Construction access was taken into account in the Site selection process, as a site which can be safely and suitably

accessed for construction / decommissioning is a vital element of site selection.

6.20 The traffic generated by the BESS development during most of its lifetime (the operation phase) will be limited to occasional maintenance and servicing visits. These smaller vehicles will utilise the access route for HGVs formed during construction and therefore will be suitable for use by maintenance and operational staff.

6.21 The road network in the vicinity of the Site includes roads which are all considered suitable for access via an articulated HGV.

6.22 An Abnormal Load Assessment has been included as part of the planning application and is summarised below:

- A selection of potential route options to site were considered at the commencement of the investigative works. Three of the six proposed routes were discounted at an early stage, one due to negotiability, and two due to structures on the existing road network (roads and bridges).
- Route 2 via Harmston from A15 has been identified as the preferred route to the Site. This has been approved by all structural authorities including Lincolnshire County Council.
- An indicative 16-axle girder frame trailer that would be expected to be utilised to transport the 139.5te transformer. It will therefore be necessary to comply with legislation regarding Special Order movements and to be delivered via the nearest port of delivery.
- The port of Immingham is where the site infrastructure will arrive to the UK. Immingham is well established for project cargo and has facilities suitable for the loads to be delivered via various marine delivery options. In principle, no difficulties are expected with delivery.

6.23 The eastern Site entrance on the northern boundary, and internal landscape planting and road network has been designed to enable future abnormal load deliveries if required for emergency maintenance purposes. Any emergency abnormal load deliveries would be agreed with the Highway Authority and any relevant other consultees as appropriate.

6.24 Further detail can be found in the supporting Transport Statement (TS), CTMP and Abnormal Indivisible Load Access Report.

Public and Pre-application Consultation

Public Consultation

6.25 Public consultation for the Proposed Development took place between 13th March and 11th April 2025. This included two public consultation events on the 13th March and 14th March. 131 people attended the two events collectively. NatPower launched a dedicated Brant Energy Storage project website on March 11th providing access to a library of documents including the project site masterplans, event exhibition boards, original newsletter and consultation information regarding the proposed development.

6.26 Public consultation included engagement with elected members within NKDC and Coleby Parish Council. Engagement included email correspondence and virtual meetings. Feedback during the public consultation was received through feedback forms received by the Applicant or through written correspondence to the project consultation email address. 98 feedback responses were received in total comprising 16 of the forms and 82 being email correspondence received.

6.27 The key issues raised as part of the feedback is detailed below:

- Site selection process and suitability
- Loss of agricultural land
- Ecology and impacts on local environment, wildlife
- Risk of fire
- Risk of flood
- Proximity to nearby RAF Waddington base
- Disruption during construction including roads and transport
- Noise levels during operation

6.28 Responses in relation to the feedback be found in the Statement of Community Involvement submitted as part of this application.

6.29 The design evolution process detailed above addressed matters identified in the feedback with the Proposed Development including the following:

- Minimum 10%+ BNG requirement exceeded due to the high quality landscape design proposed.
- New and improvements to existing hedgerow and tree planting on Site.
- Emergency vehicle access considered and included as part of the Site design.
- Appropriate transport assessments completed to inform routes for construction minimising impact on local highway network.

Pre-application consultation

6.30 As described in Chapter 1, a pre application written response was received from NKDC dated the 27th February 2025. This written response was used to inform the content of this PDAS and supporting documentation that form part of this application.

6.31 Meetings took place between the applicant, planning agent and NKDC to discuss the pre-application response on the 23rd January, 11th March and 15th April 2025. These meetings were an opportunity to discuss key matters in the pre-application response provided and discuss the future submission.

6.32 Key matters discussed at these meetings included but were not limited to:

- Proposed grid connection route for the Proposed Development;
- Grid connection agreement with National Grid; and
- NGET Navenby substation.

Design Evolution

6.33 The Site layout has gone through an iterative design process. Further detail about this can be found in ES Chapter 3 The Proposed Development and Site Description.

How the design has evolved

6.34 Throughout the development of the scheme design, a collaborative multi-disciplinary approach has been adopted. This has included ongoing communication, information sharing and maintaining a transparent and open approach to design development. This has contributed towards the iterative development of the scheme design through a series of actions:

- Pre-application submission;
- Site visits;
- Plan production and visualisations;
- Design workshop; and
- Ongoing collaborative working and multi-disciplinary approach to agreeing the Site design.

Design Considerations

6.35 The design of the Proposed Development has evolved and been refined as a result of the actions and considerations detailed. To inform assessments, surveys and design development, there has been two frozen scheme designs presented in the following figures:

- Figure 3.1: Indicative Site Layout September 2024 – Planning pre-application site layout submitted to NKDC in October 2024. Used to inform the design discussion at the design workshop in January 2025.
- Figure 1.1: Proposed Site Layout – The Scoping layout that was submitted with the Scoping Request to NKDC in February 2025 and taken to public consultation. This layout shows development of the design in terms of the locations of the BESS clusters and landscaping. This is the layout assessed in the ES.

Proposed Development's Substation

6.36 The design requirements for the Proposed Development's Substation (Proposed Substation) were a sufficient area of flat ground, consideration of flood risk, clear of trees and hedgerows, suitable access, no other environmental constraints present, consideration of key heritage and landscape designations and visual receptors.

6.37 The Proposed Substation location in the north-east corner of the Site is the most appropriate in the Site Boundary due its proximity to the vehicular access and road, position away from the Somerton Castle Scheduled Monument to the south-west, distance from existing overhead line infrastructure on site and proximity to the NGET Substation to the south-east. Its location on site has not changed throughout the design development as it was continually identified as the most appropriate location for the tallest element of infrastructure on the Site with respect to landscape and visual, and heritage.

6.38 The potential to locate the Proposed Substation offsite was discussed to reduce impact on heritage assets, landscape designations and visual receptors. An offsite location was discounted as a design option as the Proposed Substation needs to be near the BESS units, impacts being difficult to mitigate in an alternative site nearby due to the low lying flat nature of the local LCA, and appropriate landowner agreements not being in place.

6.39 Landscape planting is proposed on the northern and eastern side of the Proposed Substation to reduce its visual impact. This includes the planting of a woodland buffer with densely planted trees, existing hedgerows with large gaps being supplemented with tree and hedgerow species to reconnect the woody shrubby layer and a species rich grassland buffer between the proposed woodland and existing ditch on the eastern elevation only. This planting will increase visual screening from key local receptors.

BESS Layout and Orientation

6.40 The design requirements for the BESS were a sufficient area of largely flat land outside the floodplain, no trees or hedgerows, suitable access, limited visibility.

6.41 The BESS layout and orientation has undergone significant design changes throughout the development of the proposals. Indicative Site Layout September 2024 (Figure 3.1) included seven clusters of units across the Site, primarily on a north-south alignment.

6.42 At the Design Workshop, key issues in relation to landscape and visual, heritage, flooding, and noise and amenity impact were identified in relation to this Indicative Site Layout September 2024 (Figure 3.1). The results of the Agricultural Land Classification survey were also provided in advance of the design workshop and used to inform discussion.

6.43 The following updates were actioned in response to the discussion and input provided at the Design Workshop specific to the BESS layout and orientation.

Landscape

6.44 Layout and orientation of the battery units were adjusted to optimise space and introduce a consistent approach to layout across the Site.

6.45 Layout and orientation of the battery units were mapped within site extents and replicated historic field boundaries. This informed the layout and landscaping mitigation strategy.

6.46 The landscaping scheme has been updated to include new hedgerow and tree planting along existing field boundaries to fill gaps in the existing hedgerow network, create habitat linkages, reinforce the Site boundaries, and provide low-level screening. This included along Hill Rise Road with appropriate overhead line safety clearances for the existing National Grid infrastructure on site

6.47 Woodland planting is intended to enhance visual screening surrounding the substation in the north east corner of the site.

Heritage

6.48 The design of the Proposed Development includes a buffer space within the south-western field of the Site, with the energy storage infrastructure set back from the southern boundary to reduce the effect of the Proposed Development on the assets at Somerton Castle.

6.49 Appropriate landscape mitigation agreed to reduce impact on heritage assets.

Flood Risk and Drainage

6.50 BESS units moved out of flood risk areas, following Site specific pluvial flood risk modelling exercise. This included removal of BESS units from the north west corner.

Noise and Amenity

6.51 Battery units moved further west from the existing PRoW 4/1 that abuts the eastern elevation of the south eastern section of the Site.

Agricultural Land

6.52 The BESS clusters were moved away from sections of the confirmed best and most valuable (BMV) land within the central portions of the Site, in addition to areas in the north-west, north-east and south-east. Avoidance of BMV land could not occur in all instances due to the need to consider other environmental designations and technical design matters on Site.

6.53 The Proposed Development layout was updated and the footprint of the BESS was consolidated and reduced to address design concerns identified during its development. This resulted in the overall number of BESS units decreasing from 1,528 to 1,432.

Site Access

6.54 Construction access for the Proposed Development is required for HGVs, LGVs and AIL deliveries. Two access routes were identified on the Indicative Site Layout September 2024 (Figure 3.1) and remained in place following the completion of the swept path analysis and accompanying Transport Statement and Abnormal Indivisible Load Assessment for the Proposed Site Layout (Figure 1.1).

6.55 Operational access for the Proposed Development will be retained for maintenance visits (generally LGV).

6.56 To maintain AIL access for the lifetime of the Proposed Development in the event of transformer failure, appropriate landscape planting and gaps along the northern boundary and to the field boundaries to the west of the Proposed Substation has been included in the Site landscape design.

Site Boundary

6.57 The Site Boundary has evolved during the design process. Indicative Site Layout September 2024 (Figure 3.1) excluded a small area of land in the south-east corner. The landowner agreed for a small area of land, approximately 300sqm, to be added into the Proposed Site Layout between the design workshop and scoping. This additional area provides space for species rich grassland buffer and proposed open woodland.

Summary

6.58 Full details of design mitigation measures are outlined in the appropriate reports. These details include measures that will be implemented during construction to avoid environmental impacts.

Chapter 7
Planning Policy Context

7.1 This Chapter of the PDAS sets out the planning policy context pertinent to the Proposed Development.

Local Policy: the Development Plan

7.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Statutory Development Plan unless material considerations indicate otherwise.

7.3 The Development Plan for the Proposed Development comprises Central Lincolnshire Local Plan (CLLP), adopted April 2023), and the Coleby Neighbourhood Plan 2018-2036 (CNP) which was 'made' part of the Development Plan in January 2018. The Site lies within open countryside and within Coleby Parish, the whole of which comprises the designated area for the CNP.

Central Lincolnshire Local Plan (2023)

- **Policy S1: The Spatial Strategy and Settlement Hierarchy** – sets out that the spatial strategy will focus on delivering sustainable growth for Central Lincolnshire that meets the needs for homes and jobs, regenerates places and communities, and supports necessary improvements to facilities, services and infrastructure.
- **Policy S5: Development in the countryside** – Part E of this policy sets out requirements for non-residential development in the countryside related to accessibility, conflict with neighbouring uses and appropriate size and scale of the development.
- **Policy S10: Supporting a Circular Economy** – sets out the Joint Committee is supportive of the principles of a circular economy.
- **Policy S11: Embodied Carbon** – sets out that all development should, where practical and viable, take opportunities to reduce the development's embodied carbon content, through the careful choice, use and sourcing of materials.
- **Policy S14: Renewable Energy** – sets out that the Central Lincolnshire Joint Strategic Planning Committee is committed to supporting the transition to a net zero

carbon future and will seek to maximise appropriately located renewable energy generated in Central Lincolnshire. Proposals for renewable energy schemes, including ancillary development, will be supported where the direct, indirect, individual and cumulative impacts are considered acceptable.

- **Policy S16: Wider Energy Infrastructure –** states that the Joint Committee supports to the transition to net zero carbon future and supports, in principle, the need for significant investment in new and upgraded energy infrastructure. Support will be given to proposals which are necessary for, or form part of, the transition to a net zero carbon sub-region, which could include energy storage facilities such as battery storage. Opportunities should be taken to mitigate any harm arising by selecting appropriate locations and design solutions which minimise harm (see Policy S53).
- **Policy S21: Flood Risk and Water Resources -** requires at parts (o) and (p) that development should contribute positively to the water environment and should not adversely affect surface and ground water quality in line with the requirements of the Water Framework Directive; and that development with the potential to pose a risk to groundwater resources is not located in sensitive locations to meet the requirements of the Water Framework Directive.
- **Policy S34 Non-designated Employment Proposals in the Countryside** – sets out that in locations outside of the settlements named in the Settlement Hierarchy in Policy S1, proposals for employment generating development will be limited to the expansion of an existing employment use and development proposals that support the growth of the agri-food sector or other land-based rural businesses and buildings in accordance with relevant parts of Policy S5.
- **Policy S47 Accessibility and Transport–** sets out requires development to contribute towards an efficient and safe transport network and that proposals should demonstrate, where appropriate, that they have had regard to the need to minimise additional travel demand.
- **Policy S53 Design and Amenity –** all development proposals must achieve high quality sustainable design that contributes positively to local character, landscape and townscape, and supports diversity, equality and access for all. above, all development proposals will be expected to (amongst other things be compatible with neighbouring land uses and not result in likely conflict with existing uses.
- **Policy S54 Health and Wellbeing –** sets out the potential for achieving positive mental and physical health outcomes will be taken into account when considering all development proposals. In the case of development of 5ha or more, developers should submit a fit for purpose Health Impact Assessment (HIA) as part of the application stage.
- **Policy S57 The Historic Environment -** states that development proposals should protect, conserve and seek opportunities to enhance the historic environment of Central Lincolnshire. Where a development proposal would affect the significance of a heritage asset the applicant will be required to provide details as set out in policy.
- **Policy S59 Green and Blue Infrastructure Network** - the Central Lincolnshire Authorities will safeguard green and blue infrastructure from inappropriate development and work actively with partners to maintain and improve the quantity, quality, accessibility and management of the green infrastructure network.
- **Policy S60 Protection Biodiversity and Geodiversity** – all development should protect, manage and enhance the ecological network and minimise impacts on biodiversity.
- **Policy S61 Biodiversity Opportunity and Delivering Measurable Net Gains -** all development proposals should ensure opportunities are taken to retain, protect and enhance biodiversity and geodiversity features proportionate to their scale, through site layout, design of new buildings with consideration to the construction phase and ongoing site management. All qualifying development proposals must deliver at least a 10% measurable biodiversity net gain attributable to the development. The net gain for biodiversity should be calculated using Natural England's Biodiversity Metric.
- **Policy S62 Area of Outstanding Natural Beauty and Areas of Great Landscape Value -** a high level of protection will be afforded to AGLV reflecting their locally important high scenic quality, special landscape features and sensitivity. Development proposals should conserve, protect and enhance the qualities. Where a proposal may result in adverse impacts, it may exceptionally be supported if the overriding benefits of the development demonstrably outweigh the harm.
- **Policy S66 Trees, Woodland and Hedgerows** – development proposals should be prepared based on the overriding principle that existing tree and woodland cover is maintained and opportunities for expansion are considered.
- **Policy S67 Best and Most Versatile Agricultural Land** - states that proposals should protect the best and most versatile agricultural land so as to protect opportunities

for food production and the continuance of the agricultural economy. Significant development resulting in the loss of the best and most versatile agricultural land will only be supported if the criteria specified in the policy are met.

Coleby Parish Neighbourhood Plan (2018)

- **Policy 3 Design Character** - Development proposals will be supported where they have regard to the Coleby Character Assessment. The policy notes particular regard will be given to proposals that respect the archaeological, historic and natural assets of the surrounding area.
- **Policy 5 Access to Countryside** – sets out that development resulting in an unacceptable adverse impact on existing footpaths and rights of way will not be supported. In the appropriate location set out in the policy Figure, improvements to existing footpaths and rights of way will be sought.

Material Considerations

National Planning Policy Framework (2024)

7.4 The National Planning Policy Framework (2024) (NPPF) sets out Central Government's aim and objectives for the planning system in England. The purpose of the planning system is to contribute to the achievement of sustainable development.

7.5 Paragraph 7 sets out the purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development and supporting infrastructure in a sustainable manner. Paragraph 8 sets out the three overarching objectives of the planning system to achieve sustainable development which are an economic objective, a social objective and an environmental objective. Paragraph 11 sets out a clear presumption for sustainable development.

7.6 Paragraph 161 states that the planning system should support the transition to net zero by 2050 and take full account of all climate impacts including flood risks. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; and support renewable and low carbon energy and associated infrastructure.

7.7 Paragraph 165 sets out that plans should help to increase the supply of renewable and low carbon energy and heat by providing a positive strategy for energy from these sources.

7.8 Paragraph 168 sets out:

"When determining planning applications for all forms of renewable and low carbon energy developments and their associated infrastructure, local planning authorities should:

a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and give significant weight to the benefits associated with renewable and low carbon energy generation and the proposal's contribution to a net zero future."

7.9 Chapter 9, Promoting sustainable transport sets out that in paragraph 115 and 116 requirements for assessing sites including that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.

7.10 More broadly, the NPPF provides general land-use principles for developers, including locating development outside areas at risk of flooding (Paragraph 170); protecting and enhancing valued landscapes and sites of biodiversity or geological value and soils (Paragraph 187a); recognising the intrinsic character and beauty of the countryside (Paragraph 187b); avoiding significant harm to biodiversity (Paragraph 193a). The NPPF also requires planning decisions to prevent new development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of air, water, soil or noise pollution (Paragraph 191), thereby ensuring that projects minimise risks to human health and environmental quality.

7.11 Chapter 15, Conserving and enhancing the natural environment, paragraph 198 states that planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development.

7.12 Paragraph 201 of the same chapter sets out the focus of planning policies and decisions should be on whether Proposed Development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes).

National Planning Practice Guidance (NPPG) – Climate Change

7.13 This guidance[21] sets out that planning can support the delivery of appropriately sited green energy.

7.14 It is noted that the NPPG also reiterates that responding to climate change is central to the economic, social, and environmental aspects of sustainable development.

National Planning Practice Guidance (NPPG) – Renewable and Low Carbon Energy

7.15 This guidance[22] sets out that planning has an important role in the delivery of new renewable and low carbon energy infrastructure in locations where the local environmental impact is acceptable.

7.16 The guidance states that electricity storage can enable us to use energy more flexibly and de-carbonise our energy system cost-effectively – for example, by helping to balance the system at lower cost, maximising the usable output from intermittent low carbon generation (e.g. solar and wind), and deferring or avoiding the need for costly network upgrades and new generation capacity.

National Policy Statements

National Policy Statement for Energy (EN-1)

7.17 Overarching national policy is provided in National Policy Statement (NPS) for Energy EN -1[23]. EN-1 states that, in England, the NPS, in combination with any relevant technology specific NPSs, may be a material consideration in decision making on applications that fall under the Town and Country Planning Act 1990 (as amended).

7.18 EN-1 outlines the overall commitment to increasing renewable energy capacity in paragraph 3.3.10 which sets out:

"As part of the UK's need to diversity and decarbonise electricity generation, the Government is committed to increasing dramatically the amount of renewable generation capacity."

7.19 Paragraph 3.3.25 sets out that energy storage has a key role to play in achieving net zero and providing flexibility to the energy system, so that high volumes of low carbon power, heat and transport can be integrated.

7.20 Paragraph 3.3.26 states storage is needed to reduce the costs of the electricity system and increase reliability by storing surplus electricity in times of low demand to provide electricity when demand is higher. There is currently around 4GW of electricity storage operational in the UK, around 3GW of which is pumped hydro storage and around 1GW is battery storage.

National Policy Statement for Renewable Energy Infrastructure (EN-3)

7.21 NPS EN-3, Renewable Energy Infrastructure, informs decisions by the Secretary of State on applications they receive for nationally significant renewable energy infrastructure. NPS EN-3 should be read in conjunction with NPS EN-1 and is also a material consideration to planning applications determined under the Town and Country Planning Act 1990. Although the Proposed Development is not a renewable energy generating station, NPS EN-3 is considered relevant to the Brant BESS project considering the role it will play in supporting such development.

7.22 NPS EN-3 outlines factors influencing site selection for renewable energy generating stations and details appropriate consideration of national designations should occur. NPS EN-3 attaches weight to national designations and other locational considerations; including economic feasibility and where resource exists. Although not specifically referenced, it is considered that locational considerations extends to availability of grid connection.

7.23 As detailed in Chapter 5, Section 4.11.7 to 4.11.9 of NPS EN-3, guidance is provided in relation to approach to cumulative assessments for applications for renewable energy development and associated infrastructure.

NKDC Climate Emergency Strategy[24]

7.24 In 2019 NKDC declared a Climate Emergency, being the first Lincolnshire authority to pass such a declaration and set net zero 2030 targets.

7.25 The 'Green Thread' that runs through the NKDC Climate Emergency Strategy (CES), the Climate Emergency Action

[21] Ministry of Housing, Communities and Local Government, Ministry of Housing, Communities & Local Government (2018 to 2021) and Department for Levelling Up, Housing and Communities (2019) Guidance Climate Change. Available at: https://www.gov.uk/guidance/climate-change

[22] Ministry of Housing, Communities and Local Government, Ministry of Housing, Communities & Local Government (2018 to 2021) and Department for Levelling Up, Housing and Communities (2019). Guidance Renewable and Low Carbon Energy. Available at: https://www.gov.uk/guidance/renewable-and-low-carbon-energy

[23] UK Government. (2024). Overarching *National Policy Statement for Energy En-1*. Available at: https://www.gov.uk/government/publications/overarching-national-policy-statement-for-energy-en-1

[24] North Kesteven District Council (2019) NKDC Climate Emergency Strategy. Available at: https://www.n-kesteven.gov.uk/climate-change/nkdc-climate-emergency-strategy/nkdc-climate-emergency-strategy

Plan (CEAP) 24/25, its Environment Policy, the NK Plan 24-27 and its Community Strategy shapes how the council embeds climate and environmental action into everything they do as an organisation.

7.26 One of the Strategic Aims of this strategy is to support the District of North Kesteven to achieve the aspirational net zero 2030 target through a 95% reduction in carbon emissions from energy compared to 2005 levels, with offsetting or negative emissions technologies to be used only for the final 5% of emissions from hard to eliminate sources.

Climate Emergency Action Plan 2024-2025[25]

7.27 The Climate Emergency Action Plan (CEAP) establishes the specific actions NKDC is taking to tackle climate change as it works towards reaching net zero for NKDC and across the District of North Kesteven.

7.28 The energy theme of this plan focuses on reducing fossil fuel dependence and the emissions associated with burning fossil fuels by supporting the increase in renewable energy generation opportunities for both the Council and the District.

[25] North Kesteven District Council (2024-204) Climate Emergency Action Plan 2024 – 2025. Available at: https://www.n-kesteven.gov.uk/climate-change/climate-emergency-action-plan-2024-2025/climate-emergency-action-plan-2024-2025

Chapter 8
Planning Policy Appraisal

8.1 This chapter explains how the proposed scheme conforms to current planning policy set out in the development plan and the material planning considerations set out above in Chapter 7. It should be read together with the preceding chapters of this PDAS. The assessment considers the following:

- Central Lincolnshire Local Plan (2023);
- Coleby Parish Neighbourhood Plan (2018);
- National Planning Policy Framework (2024); and
- Other relevant material planning considerations detailed in Chapter 2 and Chapter 7.

Renewable Energy & Energy Storage

8.2 Both Local and National Policy is moving the UK towards a net zero emissions country by 2050 and to do so, a deep reduction in CO2 and other greenhouse gas emissions is urgently needed. This involves a move away from traditional fossil fuel energy sources and a drive towards renewable energy. Traditional large scale, centralised fossil fuel and older nuclear power stations are being phased out across the UK and new decentralised renewable energy generation is being developed.

8.3 Whilst renewable energy production is growing, the demand for electricity is also increasing through the electrification of the economy, alongside continued digitalisation, which will drive greater economic and strategic dependence on a secure, reliable and resilient electricity supply. In the future, overall energy demand is expected to fall, but electricity demand is projected to rise as we electrify the economy, rising 50% by 2035 and doubling by 2050[26].

8.4 With the increase in renewable energy that is required to meet net zero as well as the increase in demand, electricity storage is essential to provide flexibility in energy use and counter the more intermittent nature of renewable energy sources (compared to fossil fuels) by storing energy when it is not needed and releasing it when it is.

[26] Climate Change Committee (2023) Delivering a reliable decarbonised power system. Available at: https://www.theccc.org.uk/publication/delivering-a-reliable-decarbonised-power-system/

8.5 Batteries provide:

- the essential grid network flexibility to reliably supply consumers with electricity sourced from the growing amounts of wind and solar energy;
- the necessary real time balancing function for an electricity grid system underpinned in large measure by renewable energy; and
- are able to react within the rapid sub-second timescales needed to keep the electricity network in equilibrium and stable.

8.6 The Clean Power 2030 Action Plan; published in December 2024, states that there is a significant need for BESS in the path to the UK achieving 2030 renewable energy targets.

8.7 On a local level, NKDC has declared a Climate Emergency and has committed to reducing fossil fuel dependence in the District and working towards net zero 2030 targets. NKDC Climate Emergency Strategy[27] sets out support for increased renewable energy generation across the District.

8.8 Policy S14: Renewable Energy of the Local Plan sets out that NKDC is committed to supporting the transition to a net zero carbon future and will seek to maximise appropriately located renewable energy generated in Central Lincolnshire. Policy S14 states that *'Where significant adverse effects are concluded by the local planning authority following consideration of the above assessment(s), such effects will be weighed against the wider environmental, economic, social and community benefits provided by the proposal*.'

8.9 Paragraph 7 of the NPPF states that the "*the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development and supporting infrastructure in a sustainable manner."*

8.10 The Proposed Development will deliver a significant environmental benefit by making contributions towards UK's battery storage targets and contributing to the aims of the Clean Power 2030 Action Plan. The Proposed Development will contribute significantly towards social sustainability by indirectly providing low cost, clean power to businesses, contributing business rates and employing local people during construction. As such, the Proposed Development is in accordance with Policy S14 and NPPF paragraph 7.

8.11 Policy S16: Wider Energy Infrastructure of the Local Plan states that the Joint Committee supports the transition to net zero carbon future and supports, in principle, the need for significant investment in new and upgraded energy infrastructure. Support will be given to proposals which are necessary for, or form part of, the transition to a net zero carbon sub-region, which could include energy storage facilities, such as battery storage.

8.12 As has been outlined, the Proposed Development supports a move away from fossil fuels towards low carbon alternatives. The Local Plan sets out that demand for electrical energy is forecast to increase by 165% in Central Lincolnshire over the next 30 years. This means that flexibility of electricity supply provided by battery energy storage systems is essential in effectively and sustainably managing energy demand across the district. As such, the principle of the Proposed Development is supported, as it is needed to support the future energy demand. It is in accordance with Policy S16.

8.13 Recent planning decisions have highlighted the need for LPAs to support BESS schemes. The Inspector's decision letter approving a 35MW battery storage facility in Trafford Borough recognised the national need for BESS, strongly reinforced the critical role of battery storage in achieving energy security and net zero:

'*There is therefore considerable urgency for system services including battery energy storage schemes to come forward to enable the National Grid to handle the transition to low carbon energy sources and to underpin energy security.*' (Appeal Ref. APP/Q4245/W/24/3354822)

8.14 By making contributions towards UK BESS targets and supporting the transition to net-zero, the Proposed Development is in accordance with Local Plan policies S16, S14, the NPPF and other material planning policy considerations.

Design

8.15 Policy S16: Wider Energy Infrastructure requires proposals to select an appropriate site to mitigate any harm, and to incorporate design solutions to minimise any harm arising.

8.16 Policy S53 Design and Amenity requires all development proposals to achieve a high-quality sustainable design that contributes positively to local character, landscape and townscape, and supports diversity, equality and access for all. above, all development proposals will be expected to (amongst other things) be compatible with neighbouring land uses and not result in likely conflict with existing uses.

[27] North Kesteven District Council (2024) Climate Emergency Strategy to 20230. Available at: https://www.n-kesteven.gov.uk/climate-change/climate-emergency-action-plan-2024-2025

8.17 Policy 1 Appropriate Location for Development in the Coleby Neighbourhood Plan sets out that development will need to demonstrate that it can be carried out without resulting in an unacceptable impact on the setting of the village and wider landscape, Conservation Area, heritage assets, landscape character and level of amenity and provide acceptable safe road access. Additionally, Policy 3 Design Character sets out that development proposals will be supported where they have regard to the Coleby Character Assessment. The policy notes particular regard will be given to proposals that respect the archaeological, historic and natural assets of the surrounding area.

8.18 Chapter 4 of this PDAS and ES Chapter 3 outline the comprehensive site selection process completed to identify the Site.

8.19 As outlined in Chapter 4, the proximity of a BESS site to its grid connection point is a key factor in determining its suitability. The Proposed Development has been located to avoid sites with greater environmental or planning constraints. The lack of alternative sites closer to the grid connection point than the Proposed Development is demonstrated by the site selection exercise.

8.20 Chapter 3 of the ES outlines the design evolution of the Proposed Development. An iterative, multidisciplinary approach has been adopted, incorporating embedded mitigation measures and designing out potential impacts where possible. This multi-disciplinary approach has supported the delivery of a high quality collaborative design in accordance with Policy S53.

8.21 The strategy for design has been to minimise environmental impacts while using the land efficiently for the siting of the battery containers, substation and associated infrastructure. Other key drivers within the design process were consideration of flood risk, reducing landscape and visual impacts, reducing impacts on above and below ground heritage impacts, reducing residential visual and noise impacts and minimising other environmental and ecology impacts.

8.22 In Line with Local Plan Policy S16 and S53, and Policies 1 and 3 of the Neighbourhood Plan, the proposal has been designed in accordance with the landscape character, for example via the alignment of infrastructure with existing field boundaries to retain existing landscape features, such as hedgerows, hedgerow trees, and field ditches. The planting scheme has also been informed by species which are characteristic of the local area and provides low level screening.

8.23 In line with Policy 1 and Policy 3 of the Neighbourhood Plan, attention has been given to the visibility of the Proposed Development from Coleby and Somerton Castle as described in the Coleby Conservation Area Appraisal. The design of the Proposed Development includes a buffer space within the south-western field of the Site, with the energy storage infrastructure set back from the southern boundary to reduce the effect of the Proposed Development on the assets at Somerton Castle.

8.24 In line with Neighbourhood Plan Policy 1, the proposal has been designed to ensure maintenance and improvement of existing field access points where possible and required and consideration of construction access routes from the A15. Site access has been designed to minimise impact to existing vegetation on the Site's northern boundary along Hill Rise.

8.25 The location of the proposed substation in the north-east corner of the Site is the most appropriate part of the site, due to its proximity to the vehicular access and road, position away from the Somerton Castle Scheduled Monument to the south-west, distance from existing overhead line infrastructure on site and proximity to the NGET Substation to the south-east. Its location has not changed throughout the design development as it was continually identified as the most appropriate location for the tallest element of infrastructure on the Site with respect to landscape and visual, and heritage effects.

8.26 The design requirements for the BESS were a sufficient area of largely flat land outside the floodplain, no trees or hedgerows, suitable access, and limited visibility. Layout and orientation of the battery units were adjusted to optimise space, use a consistent approach to layout and orientation across the Site, and retain historic field boundaries. The Proposed Development layout was updated and the footprint of the BESS was consolidated and reduced to address design concerns identified during its development. This resulted in the overall number of BESS units decreasing.

8.27 The orientation of the BESS is the most considered layout in regard to the issues set out above, whilst also ensuring that the design is technically possible for the function of the Proposed Development.

8.28 The Site has been selected to mitigate and minimise environmental impacts while meeting technical requirements and is considered appropriate for battery storage, with design solutions implemented to minimise potential harm. It is considered that the Proposed Development is in accordance with Local Plan Policy S16 and S53, and Policies 1 and 3 of the Neighbourhood Plan.

Landscape and Visual Effects

8.29 Policy S59 Green and Blue Infrastructure Network of the Local Plan sets out that Central Lincolnshire Authorities will safeguard green and blue infrastructure from inappropriate development and work actively with partners to maintain and

improve the quantity, quality, accessibility and management of the green infrastructure network.

8.30 Policy S62 Area of Outstanding Natural Beauty and Areas of Great Landscape Value states a high level of protection will be afforded to AGLV reflecting their locally important high scenic quality, special landscape features and sensitivity.

8.31 Policy S66 Trees, Woodland and Hedgerows sets out that development proposals should be prepared on the principle that the existing tree and woodland cover is maintained, improved and expanded and opportunities for expanding woodland are actively considered, and implemented where practical and appropriate to do so.

8.32 The Local Plan identifies an Area of Great Landscape Value (AGLV) 450m to the east of the Site extending along an escarpment which runs in a north-south alignment.

8.33 NPPF paragraph 187 (a) states that *"Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes…".* The Scoping response provided by NKDC states the Council is likely to assess the proposals as being located within a *"valued landscape"* in accordance with NPPF paragraph 187 (a). The applicant intends to seek a greater understanding of why this is considered a valued landscape in line with NPPF paragraph 187 (a), and may provide a further submission on this point.

8.34 Full details of the landscape and visual impact of the Proposed Development is outlined within ES Chapter 5 Landscape and Visual Impact Assessment.

8.35 The assessment concludes that during construction of the Proposed Development, there will be some temporary and permanent, significant adverse landscape effects on the character of the Witham and Brant Vales Landscape Character Sub Areas (LCSA) as construction activity will not enhance the landscape and will disrupt the tranquil nature of the rural landscape. The AGLV is part of Witham and Brant Vales LCSA and runs in a north-south alignment along the eastern section. There will also be localised significant adverse effects during operation at Year 1 and Year 15. Direct effects will arise from the presence of the completed development, including associated green infrastructure in the form of tree, hedgerow and grassland planting some of which will still be maturing at Year 1.

8.36 During operation of the Proposed Development, there will be some permanent, significant adverse effects on both the landscape character and visual amenity.

8.37 There will also be some temporary and permanent, significant adverse landscape effects on the landscape resource of arable fields, sections of hedgerows, mature hedgerow trees, and a small section of field ditch. These effects are predominantly due to the partial loss of features to facilitate construction activity and Site access.

8.38 During construction, there will also be some temporary and permanent significant adverse visual effects on users of the Public Rights of Way, users of Hill Rise (local road), users of the Viking Way, users of Church Lane and Broughton Lane, small parts of the communities at Harston, Coleby, Boothby Graffoe, and Navenby, and residents at Somerton Castle. Significant visual effects are predominantly due to a significant change in close or clear, elevated views towards the Site where these are available, and will be localised.

8.39 With regards to Cumulative Landscape Effects the assessment concludes that the Proposed Development is located separate from the cumulative schemes with limited visual connectivity.

8.40 Adverse landscape and visual effects have been minimised wherever possible through an iterative design process. A high-quality design has been achieved to ensure that the proposal fits into the landscape character and responds well to the wider setting. It is considered that the Proposed Development design maximises beneficial effects on landscape character and views. As such, whilst there is harm to the landscape, including to part of the setting of and some views from the AGLV, this needs to be balanced against the need for renewable energy development and the mitigation measures that have been put in place. Policy S62 states where a proposal may result in adverse impacts, it may exceptionally be supported if the overriding benefits of the development demonstrably outweigh the harm – in such circumstances the harm should be minimised and mitigated through design and landscaping. As such, the Proposed Development is considered to accord with this policy.

8.41 The proposed landscape planting will increase and improve the quality, accessibility and management of the green infrastructure network.

8.42 Most existing hedgerows, hedgerow trees, and field ditches will be retained or enhanced, in line with Policy S59 and S66. The proposed landscape mitigation planting scheme will feature a broad selection of native species that are characteristic of the local area and well-suited to the project's objectives.

8.43 It is considered that despite the landscape and visual impacts created by the Proposed Development, the overriding benefit the proposals will create in terms of energy storage, the iterative design process followed and the retained and improved hedgerows, hedgerow trees and field ditches, the development is in accordance with Policy S59, Policy S62 and Policy S66.

Heritage

8.44 Local Plan Policy S57: The Historic Environment sets out that development proposals should protect, conserve and seek opportunities to enhance the historic environment of Central Lincolnshire. Where there is harm to a heritage asset, applicants must describe and assess the significance of the asset, identify the impact and provide a clear justification for the works.

8.45 The policy states that significant weight will be given to the protection and enhancement of Conservation Areas.

8.46 Additionally, development affecting archaeological remains, whether known or potential, designated or undesignated, should take every practical and reasonable step to protect and, where possible, enhance their significance.

8.47 An assessment of the impact on heritage assets has been submitted as part of ES Chapter 6: Archaeology and Historic Environment. An appended Historic Environment Assessment has also been submitted. This planning statement should be read alongside these documents for full details of the impact. The preparation and submission of ES Chapter 6: Archaeology and Historic Environment and the Historic Environment Assessment, ensures that the Proposed Development accords with Policy S57 (a) and (b).

8.48 Chapter 3 sets out the need for the Proposed Development, providing a clear justification for the works in accordance with Policy S57 (c).

8.49 In regard to baseline conditions, one non-designated heritage asset was identified within the Site, an unnamed 19th century farmstead within the north-eastern corner. Some potential for later prehistoric and Roman archaeological remains was identified within the Site as well as medieval or later agricultural remains. Designated heritage assets at Somerton Castle, Coleby, Boothby Graffoe, Navenby and Harmston were identified as having potential to be affected by the Proposed Development due to changes within their setting.

8.50 There is potential for construction activities associated with groundworks for structures within the Site to truncate or entirely removed any buried archaeological remains within their footprint. Such remains include the buried remains of the known former 19th century farmstead within the north-east of the Site which is of low value, potential later prehistoric or Roman archaeological remains which could be of low to high value, and potential medieval or later agricultural remains of low value. Any effects of remains of low or medium value would not be considered significant but effects on any high value remains found within the Site would be considered significant under the terms of the EIA Regulations. The Proposed Development would therefore result in less than substantial harm to total loss of these remains, if any are found.

8.51 The assessment has identified that the Proposed Development could result in some less than substantial harm to the Grade I listed Somerton Castle and Outbuilding to Nort-West (NHLE Ref. 1061974), the Coleby Conservation Area and the grade II Coleby Hall RPG (NHLE Ref. 1000973). This impact would be a result of changes to the setting of these assets which could impact upon their significance.

8.52 No further designated or non-designated assets within the surrounding area have been identified as being susceptible to harm as a result of the Proposed Development.

8.53 Policy S57 states "*Where a development proposal would result in less than substantial harm to a designated heritage asset, permission will only be granted where the public benefits, including, where appropriate, securing its optimum viable use, outweigh the harm.*"

8.54 The design of the Proposed Development has considered some mitigation measures to reduce the effect of the Proposed Development on heritage assets.

8.55 The north-eastern corner of the Site was identified as the most suitable location for the customer substation to minimise impacts from Coleby Conservation Area and Somerton Castle. The customer substation is the tallest and most visually intrusive individual element of the Site and comprises of a series of components of differing heights (measuring 10.25 metres at its highest point) and scale. This was the most suitable location for the customer substation due to existing trees and hedgerow surrounding its proposed location which could be strengthened and enhanced as part of the proposed landscape planting, and its distance and location from Somerton Castle.

8.56 The protection of the Conservation Area needs to be balanced against what is technically possible for the scheme's design and to secure its optimum viable use. As such, the Proposed Development is in accordance with Policy S57 (o) and (q), as its design has reduced negative impact on setting of the Conservation Area and mitigates against the negative impact the proposal might have on the have on the skyline and landscape.

8.57 The design of the Proposed Development has sought to reduce the impact of the proposals and optimise its viable use. Large scale BESS development makes significant contributions to national and local battery storage needs and requirements as detailed in Chapter 3. The iterative design process has resulted in changes to the Site layout whilst maintaining a similar number of proposed battery storage units on site. The design approach adopted has resulted in reduced impacts created by the Proposed Development whilst maximising its contributions to energy storage targets.

8.58 The Proposed Development has been designed to ensure the Site infrastructure is set back from southern boundary of south-western field to reduce effect on the setting of Somerton Castle. Whilst the proposal will not better reveal the significance of the Listed Building, the harm will be less than substantial.

8.59 Policy S57 sets out that where a development proposal would result in less than substantial harm to a designated heritage asset, permission will only be granted where the public benefits. It is considered that despite the Proposed Development resulting in less than substantial harm to a designated heritage asset, permission should be granted due to the public benefits the proposal will create outweighing harm created. As such, the proposal is in accordance with Local Plan policy S57.

8.60 The mitigation strategy for any archaeological remains identified within the Site would involve further archaeological fieldwork, which would not reduce the level of effect but will provide a record of the features lost as a result of the development, preserving them by record which follows industry best practice. This is in line with Policy S57 which requires a record to be produced when preservation is not possible. The archiving of any findings from the archaeological trenching will be agreed with the LPA in accordance with Policy S57.

8.61 On overall balance, it is considered that the Proposed Development is in accordance with Policy S57.

Best and Most Versatile Land

8.62 Policy S67 Best and Most Versatile Agricultural Land of the Local Plan sets out that proposals should protect the BMVAL so as to protect opportunities for food production and the continuance of the agricultural economy.

8.63 The policy notes that significant development resulting in the loss of the BMVAL will only be supported if (a) the need for development is clearly established, (b) the benefits and/or sustainability considerations outweigh the need to protect such land, (c) impacts have been minimised upon ongoing agricultural operations are where feasible and (d) land will be restored to its former use.

8.64 The policy states that where proposals are for sites of 1 hectare or larger, which would result in the loss of BMVAL, an agricultural land classification (ALC) report should be submitted. An ALC Report has been included as part of this application (ES Chapter 10 Appendix 10.1).

8.65 ES Chapter 10 Volume 1 sets out the impacts of the Proposed Development on BMVAL. ES Chapter 3 and Chapter 4 in this PDAS details the sequential approach adopted to the Site selection.

8.66 The Proposed Development lies on land comprised of a near even mixture of BMVAL (16.47 ha Subgrade 3a) and non-BMVAL (18ha, 52.19% Subgrade 3b).

8.67 The Proposed Development will result in the loss of all the agricultural land during the construction and operational phases. Because of the relatively long lifetime of the Proposed Development, this land use change is considered permanent for this assessment, resulting in a significant adverse impact.

8.68 The effects on soil damage and loss are potentially significant at all stages of the Proposed Development's lifetime, however these are easily mitigated by following best practice as identified in ES Chapter 10 and below.

8.69 Whilst the loss of agricultural land use cannot be fully mitigated during the operation of the Proposed Development, the provision of a detailed Soil Management Plan (SMP) and Construction Environmental Management Plan (CEMP) and a Landscape and Ecological Management Plan (LEMP) will mitigate the effects on soil loss and damage during Construction and Operation phases.

8.70 The implementation of a Decommissioning Plan focused on the return to the baseline soil conditions after the operational phase will result in the restoration of the lost agricultural land and no change in baseline conditions, resulting in a neutral effect.

8.71 Direct land and soil disturbance as result of the Proposed Development building footprint will be restricted to approximately 15ha. Of this 15ha, approximately 6.8ha will be BMVAL. Therefore, actual disturbance of BMVAL because of the Proposed Development is significantly less than the total BMVAL on Site.

8.72 The need for the development has been set out in Chapter 3 of this PDAS, which demonstrates the requirement for the UK to increase the available energy storage capacity, of which the Proposed Development will be integral. Best efforts have been made to minimise impacts on agricultural land where feasible. Chapter 3 of this PDAS sets out the critical need for the Proposed Development. Chapter 4 of this PDAS sets out the site selection methodology and demonstrates the lack of alternative lower quality and suitable sites closer to the point of connection. It shows that 95.8% of the land within the 10km site selection radius is or has the potential to be BMVAL. Considering the need for the Site to be close to its point of connection, the high percentage of BMVAL land in the local area and the other site selection factors identified in Chapter 4, it is considered that the Site identified is suitable for the Proposed Development in accordance with Policy S67 criterion (a).

8.73 The Proposed Development will deliver a range of environmental, economic and social benefits as detailed in this Chapter of the PDAS. These benefits include a significant

contribution to national and local battery storage targets, increased resilience of community energy supply, and job creation. Policy S67 criterion (b) is also met as the sustainability benefits provided by the BESS outweigh the benefits of the BMVAL land.

8.74 The Proposed Development has avoided impacting on agricultural operations during the survey stage. The Proposed Development will not impact on the agricultural operations of the wider landholding during construction and operation. As such, the Proposed Development is in accordance with criterion (c).

8.75 At decommissioning stage, all hardstanding is to be removed from the Site and the Site will be restored and returned to agriculture as set out in ES Appendix 4.1 Draft Decommissioning and Restoration Strategy. As the full agricultural land resource will be reinstated, the Proposed Development accords with criterion (d) of the policy.

8.76 The Proposed Development has been demonstrated to be acceptable in regard to the need for the development, and its sustainability considerations outweigh the need to protect BMVAL taking into account the economic and other benefits of BMVAL. As such, the proposal accords with Policy S67.

Social and Economic benefits

8.77 The Vision for the Local Plan aims to make Central Lincolnshire "*a prosperous and desirable place to live, work and visit."* Underpinning this vision are fifteen overarching objectives including:

"14) Employment: To create and improve access to high quality employment, training and learning opportunities for everyone within the Central Lincolnshire area.

15) Local Economy: To encourage and support a competitive, diverse and stable economy and to protect and enhance Central Lincolnshire's hierarchy of centres to meet the needs of residents and visitors."

8.78 The Proposed Development will provide economic benefits during the logistical, construction and post construction phases (maintenance). As detailed in the Economic Impact Assessment submitted in support of this application, the Proposed Development will deliver the following economic benefits:

- 90 full-time equivalent (FTE) construction jobs (during the peak of the construction phase);
- 110 FTE supply chain jobs (during peak of the construction phase);
- £17.6 million gross value added (throughout the peak of the construction period); and
- Support economic output through supplying clean, domestic energy.

8.79 As detailed in Chapter 3, the Proposed Development will contribute to meeting the Net Zero Strategy target of decarbonising the electricity grid by 2035 and the UK target of meeting net zero emissions by 2050. The Proposed Development helps to ensure that the essential expansion of intermittent solar and wind power generation does not harm grid parity and security. The proposal would support growth and prosperity in the energy sector and improve energy security by diversifying the area's energy supply mix and help to protect the local communities from potential black outs. As such the Proposed Development is in accordance with the relevant policies from the Local and Neighbourhood plans.

8.80 In summary, it is considered that the Proposed Development is in accordance with the Local Plan due to the social and economic benefits it will create.

Agricultural Economy

8.81 The need for renewable energy and energy storage offers landowners and farmers an alternative income stream that can significantly alleviate financial pressures on their businesses.

8.82 The Proposed Development is located on agricultural land. Policy S1 'The Spatial Strategy and Settlement Hierarchy', states the Site is in a Tier 8 ('Countryside') location. The policy notes that development in the countryside will be restricted to (amongst other things) renewable energy generation.

8.83 Policy S5 of the Local Plan states that non residential development in the countryside will be supported provided that the rural location of the enterprise is justifiable to maintain or enhance the rural economy, is suitable in terms of accessibility, the location would not result in conflict with neighbouring uses and the size and scale are appropriate.

8.84 Policy S34 details that proposals for employment generating development will be limited to the buildings in accordance with Policy S5, and where criteria (a) to (f) contained in Policy S34 are met.

8.85 The pre application response received from NKDC confirms:

'In general terms, by virtue of the nature of the proposed use, together with land requirements, it is considered that an open countryside location, away from residential areas/sensitive receptors is appropriate and indeed necessary'.

8.86 The proposal provides an opportunity for diversification of the rural economy and its proposed use and location on agricultural land in the countryside is in accordance with Policy

S1, Policy S5 and criterion (a) and (d) of Policy S34 of the Local Plan.

8.87 The Proposed Development would not include a conversion of an existing building so it is considered that Policy S34 criterion (f) is not relevant.

8.88 As detailed in the Transport sub-section of this Chapter, no unacceptable impacts would be created on the local or strategic highway network or PRoW serving the Site. The Proposed Development is found to be in accordance with criterion (b) and (e) of Policy S34.

8.89 The Proposed Development has been designed to be compatible with the landscape and cause undue harm to the open nature of the countryside it is situated. This is evidenced in Chapter 6 of this PDAS and the Landscape and Visual sub-section of this Chapter. It is considered the Proposed Development is in accordance with criterion (c) and (d) of Policy S34.

8.90 As such, the Proposed Development is in accordance with Policy S1, S5 and Policy S34.

Transport

8.91 Policy S47 Accessibility and Transport of the Local Plan sets out that development proposals which contribute towards an efficient and safe transport network will be supported. Coleby NP Policy 5 Access to countryside sets out that development resulting in an unacceptable adverse impact on existing footpaths and rights of way will not be supported.

8.92 NPPF paragraph 115 and 116 sets out requirements for assessing sites including that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.

8.93 A Transport Statement (TS) has been submitted as part of this planning application and sets out details of the Proposed Development in relation to transport and how national and local transport policy is complied with. The TS sets out that the forecast operation of the site will not have any observable impact on the local highway network

8.94 The CTMP sets out that the traffic associated with the construction of the Proposed Development will be relatively low and limited to a temporary period of 18 to 24 months, mitigating the potential for any safety concerns to arise. It is therefore concluded that the proposed construction route provides a safe and suitable connection to the site.

8.95 The nearest PRoW to the site (COL/4/1) does not fall within the Site and will remain open for the duration of construction. This is in accordance with the Coleby NP and Policy S47 of the Local Plan.

8.96 As detailed in Chapter 6 and in the supporting CTMP to this application, the temporary impact on traffic and transport is found to be acceptable. This is in accordance with the Coleby NP Policy 5 and Policy S47 of the Local Plan.

8.97 The Proposed Development will not have a severe impact upon the safety or operation of the surrounding local highway network and is therefore in accordance with NPPF paragraphs 115 and 116, and Local Plan policy S47.

Flood Risk

8.98 Policy S21 Flood Risk and Water Resources of the Local Plan sets out that all development proposals will be considered against the NPPF, including application of the sequential and, if necessary, the exception test. Development proposals that are likely to impact on surface or ground water should consider the requirements of the Water Framework Directive.

8.99 The ES Chapter 8 Hydrology and Drainage sets out the potential effects of the Proposed Development on hydrology and drainage. An accompanying FRA and outline drainage strategy has been submitted in accordance with the NPPF to demonstrate that flood risk can be managed sustainably. This planning statement should be read alongside these documents for full details of impacts.

8.100 Though the site is located within Flood Zone 1 and is not considered to be at risk of fluvial flooding, sequential testing is required as sections of the site are at risk of flooding from surface water. As detailed within the supporting FRA for this application, an alternative site selection assessment was carried out, concluding that a suitable alternative site was not available. The development has been informed by and taken account of the best available information from all sources of flood risk and by site specific flood risk assessments in accordance with Policy S21 (a).

8.101 There is no risk from groundwater flooding at the Site due to the underlying mudstone bedrock and soils with impeded drainage.

8.102 The impact of climate change upon flood risk and drainage has been considered in the flood modelling. Critical infrastructure for the BESS has been sited outside the pluvial flood extent and only sections of the access tracks are within the design 1.0% annual exceedance probability (AEP) plus climate change event extent. The residual flood risk will also be managed as part of the surface water drainage strategy. This ensures the development will be safe during its lifetime, in accordance with Policy S21 (c) and (e).

8.103 The Proposed Development has been incorporated into the pluvial model to assess the impacts of the proposed culverts. A depth change analysis between the baseline and post-development model results indicated that there are no third-party impacts associated with the development, in line with Policy S21 (b).

8.104 A SuDS approach will be utilised to manage surface water generated from impermeable areas on site in accordance with Policy S21 (f). Further detail can be found in the ES Appendix 8.1 Flood Risk Assessment and Drainage Strategy.

8.105 No significant effects on hydrology and drainage have been identified as a result of the construction or operation of the Proposed Development, or the cumulative effects of other proposed schemes. As such, the proposal is in accordance with Policy S21.

Environmental Health

8.106 Policy S54 Health and Wellbeing of the Local Plan sets out that the potential for achieving positive mental and physical health outcomes will be taken into account when considering all development proposals. Where any potential adverse health impacts are identified, the applicant will be expected to demonstrate how these will be addressed and mitigated.

8.107 Policy S14 Renewable Energy sets out that developments will be assessed against their impact on the amenity of sensitive neighbouring uses, including noise.

8.108 Policy S16 states that proposals which are necessary for, or form part of, the transition to a net zero carbon sub-region including energy storage facilities, should take all reasonable opportunities to mitigate any harm arising.

8.109 Policy S53 Design and Amenity sets out that all development proposals will be compatible with the amenity of neighbouring occupiers.

8.110 A Health Impact Assessment (HIA) has been submitted as part of this planning application and demonstrates that the Proposed Development will not have an adverse impact on health and wellbeing demonstrating compliance with Policy S54.

8.111ES Chapter 3 and Chapter 3 of this PDAS sets out the site selection process used to identify the Site. Appendix C2 Residential Properties and Settlement Boundaries details the 250-metre minimum buffer applied to ensure no residential property would suffer adverse impacts. This buffer has reduced the Proposed Development's impact on the amenity of sensitive neighbouring users and is evidence of the design taking reasonable opportunities to mitigate harm created by the proposals. It is considered the Proposed Development is in accordance with Policy S14 and Policy S16.

8.112 ES Chapter 9 Volume 1 sets out the effects of the Proposed Development on noise in relation to people.

8.113 Sensitivity of receptors has been determined on the basis of the use of their property. All residential receptors have been considered to be highly sensitive to noise. This has included Somerton Castle grounds to the southwest of the Proposed Development and amenity areas such as private gardens. Farming or other industrial sheds are not considered sensitive to noise.

8.114 Construction traffic noise is expected to have a significant effect however this will be mitigated by limiting agreed construction hours to day time during weekdays and Saturday until 4pm, to reduce disturbance, such that significant effects will be avoided. Additionally, contractors will liaise with their counterparts in other major proposed developments in the area to ensure that HGV and Abnormal Load construction traffic do not coincide along the same routes and periods.

8.115 Operational noise has been mitigated by incorporating equipment quieter than average and in specific areas introducing a buffer to increase the distance to noise sensitive receptors.

8.116 After mitigation, no likely significant adverse effects have been identified with regards to noise. As such, the amenity of neighbouring occupiers is protected and level of noise acceptable, in line with Local Plan Policy S16, S53 and Policy S54.

Ecology

8.117 Policy S59 Green and Blue Infrastructure Network of the Local Plan sets out that proposals that cause loss or harm to the green and blue infrastructure network will not be supported unless the need for and benefits of the development demonstrably outweigh any adverse impacts. Development proposals should ensure that existing and new green and blue infrastructure is considered and integrated into the scheme design from the outset.

8.118 Policy S60 Biodiversity and Geodiversity sets out how development should (a) protect, manage, enhance and extend statutory and non-statutory ecological network, (b) minimise impacts on biodiversity and features of geodiversity value, (c) deliver measurable and proportional net gains in biodiversity, and (d) protect and enhance aquatic environment.

8.119 Policy S61 Biodiversity Opportunity and delivering measurable net gains, states that all development proposals should ensure opportunities are taken to retain, protect and

enhance biodiversity and geodiversity features. Biodiversity net gain should be provided on-site wherever possible.

8.120 No statutory or non-statutory designated sites will be affected by the Proposed Development.

8.121 The Proposed Development has been designed to minimise impacts on priority species and habitats in accordance with criterion (b) of Policy S60. Due to the nature of the development, some habitats will be lost through land take for development in the form of arable fields, two category C trees (see below), five sections of hedgerow and one small section of ditch. It retains existing hedgerows, trees, ditches and other features wherever possible, protecting and enhancing green and blue infrastructure, through the mitigation measures set out in the ES Chapter 7 Ecology Volume 1.

8.122 The mitigation measures consider the assessment of effects that may arise as a result of the Proposed Development. This includes loss of habitats; impacts on bats; impacts to badger affecting commuting and foraging in the operational phase; loss of habitat supporting breeding birds; direct impacts to nesting birds during the construction phase of the Proposed Development; risk of harm to reptiles during both phases; potential impact to great crested newt; direct impacts to water vole and otter and degradation of habitats; and degradation of habitats supporting invertebrates during the construction phase of the Proposed Development. Overall, however, the effects identified will generally be appropriately mitigated, such that no significant effects will remain. A breakdown of the summary of significant effects can be found in ES Chapter 7 Table 7.2 Summary of Significant Effects.

8.123 The landscape design as detailed in the Illustrative Landscape Strategy Plan, incorporates a range of habitats to be created and enhancements to existing habitats. The Illustrative Landscape Strategy Plan details the landscape mitigation proposed and includes improvement and extension to existing habitats and planting (as detailed in 8.40 to 8.42). Therefore, the Proposed Development is considered to be in accordance with criterion (a) of Policy S60.

8.124 Biodiversity Net Gain (BNG) in excess of the mandatory 10% will mitigate for habitat loss. As detailed in the supporting BNG Assessment for this application (Appendix 7.7 of the ES), the development proposals would likely result in a net gain of approximately 42.86 habitat units (+57.60%), net gain of approximately 9.33 hedgerow units (+33.03%) and net gain of approximately 1.19 watercourse units (+10.51%). This significantly exceeds the mandatory 10% target, as such the proposed development is in accordance with criterion (a), (c) and (d) of Policy S60 and Policy S61.

8.125 Good practice measures will be followed as outlined in the submitted Construction Environment Management Plan ensuring that ecological receptors are fully safeguarded during construction.

8.126 The proposal will protect the GBI network through the retention of habitats where possible and will mitigate the limited harm to habitats and species through BNG. As such, the proposed development is in accordance with Policies S60 and S61.

Trees

8.127 Policy S66 Trees, Woodland and Hedgerows of the Local Plan sets out that proposals should be prepared based on the overriding principle that the existing tree and woodland cover is maintained, improved and expanded; and opportunities for expanding woodland are actively considered, and implemented where practical and appropriate to do so.

8.128 Planning permission will only be granted if the proposal provides evidence that it has been subject to adequate consideration of the impact of the development on any existing trees and woodland found on-site.

8.129 An Arboricultural Impact Assessment has been submitted as part of the planning application. This makes an assessment in accordance with BS5837:2012 Trees in relation to design, demolition and construction - Recommendations. By using collected tree data and design proposals, it assesses any potential impacts on existing trees including any tree loss required to implement the design, protection measures needed and any special mitigation techniques and recommendations that should be incorporated.

8.130 The tree survey recorded a total of 42 individual trees and 19 hedgerows, predominantly composed of mixed semi native deciduous species. This included:

- 1 x Category A tree
- 8 x Category B trees
- 23 x Category C trees
- 19 x Category C hedgerows
- 10 x Category U trees

8.131 No trees considered to be veteran were found on or adjacent to the Site. There are no trees on the Site, or within its vicinity, that are subject to a Tree Preservation Order. The Site is not situated within a Conservation Area.

8.132 To facilitate the Proposed Development the removal of two individual Category C trees, and the partial removal of five Category C hedgerows is required.

8.133 All other trees surveyed can be retained on site with adequate protection or specialised mitigation methods. This includes protective fencing or protective barrier enclosing the Root Protection Areas (RPAs) of retained trees, root pruning

of 1 x Category C tree, and following of best practice advice as detailed in the submitted Construction Environmental Management Plan.

8.134 As outlined above, the impact of the proposed development on existing on-site trees has been thoroughly considered through the Tree Survey and Arboricultural Impact Assessment, in line with Policy S66. The proposal will not result in the loss or deterioration of ancient woodland, veteran trees, TPOs or trees within a Conservation Area in accordance with Local Plan policy.

8.135 Policy S66 requires the specific mitigation for higher value Category A or B trees. While the Proposed Development will result in the loss of two trees and the partial removal of five hedgerows all Category C, it will deliver a biodiversity net gain of over 10%, more than compensating for these losses in accordance with Policy S66.

Summary

8.136 In accordance with the appraisal set out above, the Proposed Development is sited in an appropriate location considering the nature of the proposals and has been designed in a manner which addresses all relevant planning policy considerations, and it is therefore in accordance with the development plan and other material considerations.

Chapter 9
Conclusions and Summary

9.1 This PDAS has been prepared by LUC (the Agent) on behalf of Navenby Energy Ltd (the Applicant) in support of the planning application for Brant Energy Storage, the development of an energy storage scheme and associated infrastructure, engineering works and landscaping at land off Hill Rise west of Coleby and north of Navenby, Lincolnshire LN5 0LL (the Proposed Development).

9.2 This PDAS includes a description of the Site and surrounding area, and relevant designations.

9.3 As an energy storage development, the Proposed Development will make a significant contribution to the UK's BESS capacity with a proposed 1GW of energy storage. The Proposed Development will provide increased flexibility to the national grid, helping to address a key constraint to renewable energy generation development, and will facilitate the increased use of renewable energy in place of fossil fuels.

9.4 The development will therefore contribute to objectives and ambitions set by the UK government to achieve net zero emissions by 2050, including legislation set out in the Climate Change Act 2008 and planning policy within the NPPF. The proposal will also contribute locally to net zero targets, with NKDC committing to net zero by 2030.

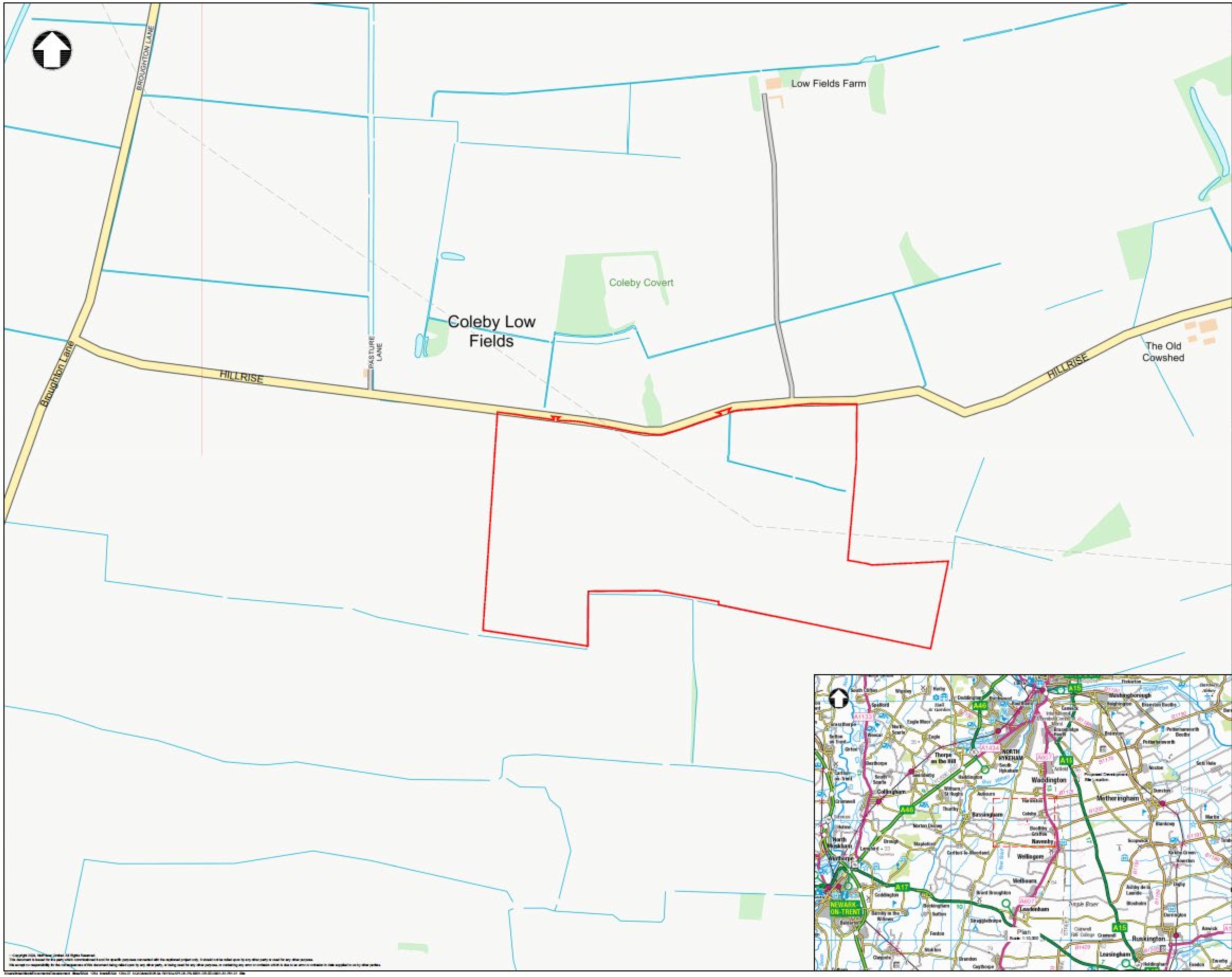
9.5 As set out in Chapter 8, the Proposed Development will result in some negative impacts including less than substantial harm to the change of setting to three heritage assets at Somerton Castle and Coleby, some localised temporary and permanent, significant adverse landscape effects, and limited loss of BMV agricultural land. However, its siting and design minimises impacts in line with Neighbourhood Plan Policy 3 and Local Plan Policy S53, contributes to national and local need for energy storage development in line with Local Plan Policy S14 and S16, delivers biodiversity opportunities and measurable net gains in line with Policy S60 and Policy S61, and social and economic benefits in line with Local Plan Policy S5. The Proposed Development accords with other relevant Local Plan policies as detailed in Chapter 8 of this PDAS.

9.6 Overall, the development proposes an appropriate new use for the Site that is compliant with the development plan and material considerations.

9.7 Considering also the need for BESS sites to be in close proximity to their Point of Connection, the limited availability of other potential sites in the local area, BNG and social and economic benefits created, it is considered on balance that the Proposed Development should be approved without delay.

Appendix A

Location plan



Key to symbols

Planning Application Boundary

0 125 250m

P01.01		CJB	Preliminary Issue	DF	RJ
Rev	Date	Drawn	Description		

NatPower

Title

Brant Energy Storage
Location Plan

Designed	R. C. Smith	–	Dwg check	D. Fu	–
Drawn	C. J. Bassin	–	Approved	R. James	–

Suitability Code: S1 — Suitability Description: Suitable for coordination

Scale at A0	Work Stage	Status	Rev
2,500	PS	PRE	P01.01

Drawing Number: Figure 1

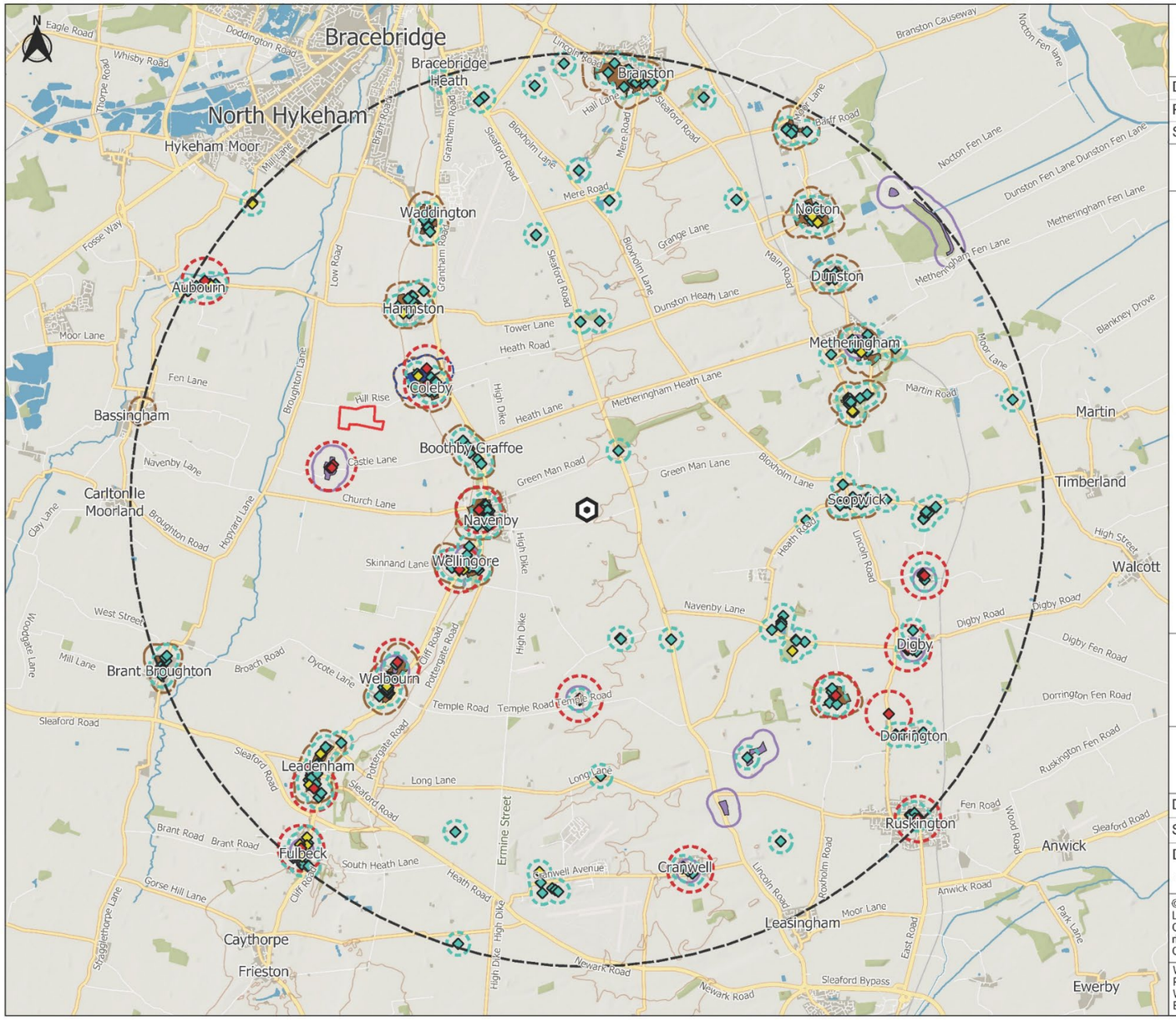
A.1

Appendix B
Site Layout

Appendix C

Figures – Site Selection Figures

Appendix C.1 Designated Heritage Assets



BRANT BESS

Date:	26-03-2025
Paper size:	A3
Scale:	1:80,000

Key:

- Site Boundary
- Point of Connection
- 10 km Study Area
- Scheduled Monuments
- 250 m Scheduled Monument Buffer
- Conservation Areas
- 250 m Conservation Area Buffer

Listed Buildings

- Grade I
- Grade II*
- Grade II
- 250 m G2 Listed Building Buffer
- 500 m G1 Listed Building Buffer

Registered Parks and Gardens

- Grade II
- 250 m G2 RPG Buffer

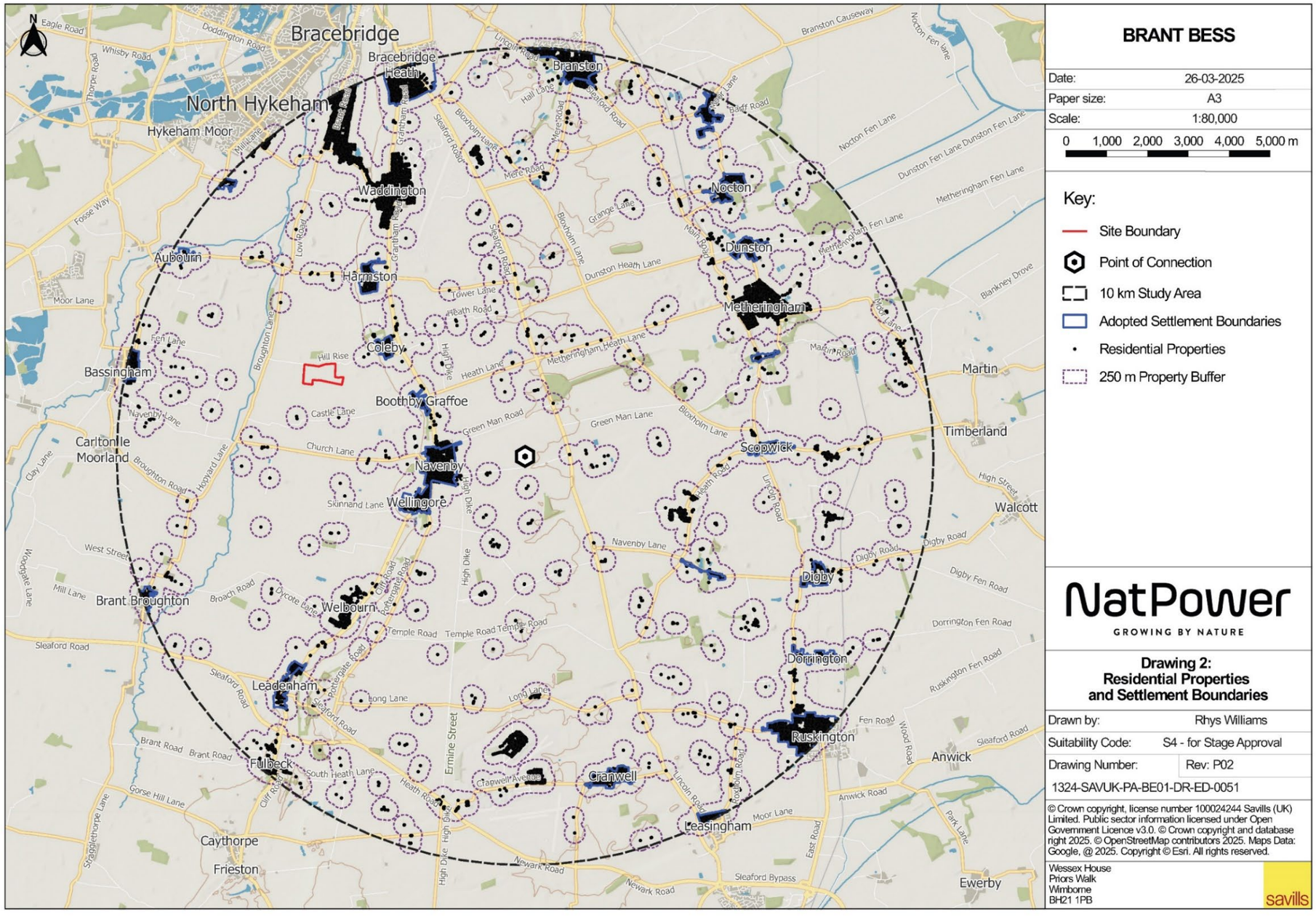
NatPower
GROWING BY NATURE

Drawing 1: Designated Heritage Assets

Drawn by:	Rhys Williams
Suitability Code:	S4 - for Stage Apprval
Drawing Number:	Rev: P02
1324-SAVUK-PA-BE01-DR-ED-0050	

Wessex House
Priors Walk
Wimborne
BH21 1PB
savills

Appendix C.2 Residential Properties and Settlement Boundaries



BRANT BESS

Date:	26-03-2025
Paper size:	A3
Scale:	1:80,000

0 1,000 2,000 3,000 4,000 5,000 m

Key:

- Site Boundary
- Point of Connection
- 10 km Study Area
- Adopted Settlement Boundaries
- Residential Properties
- 250 m Property Buffer

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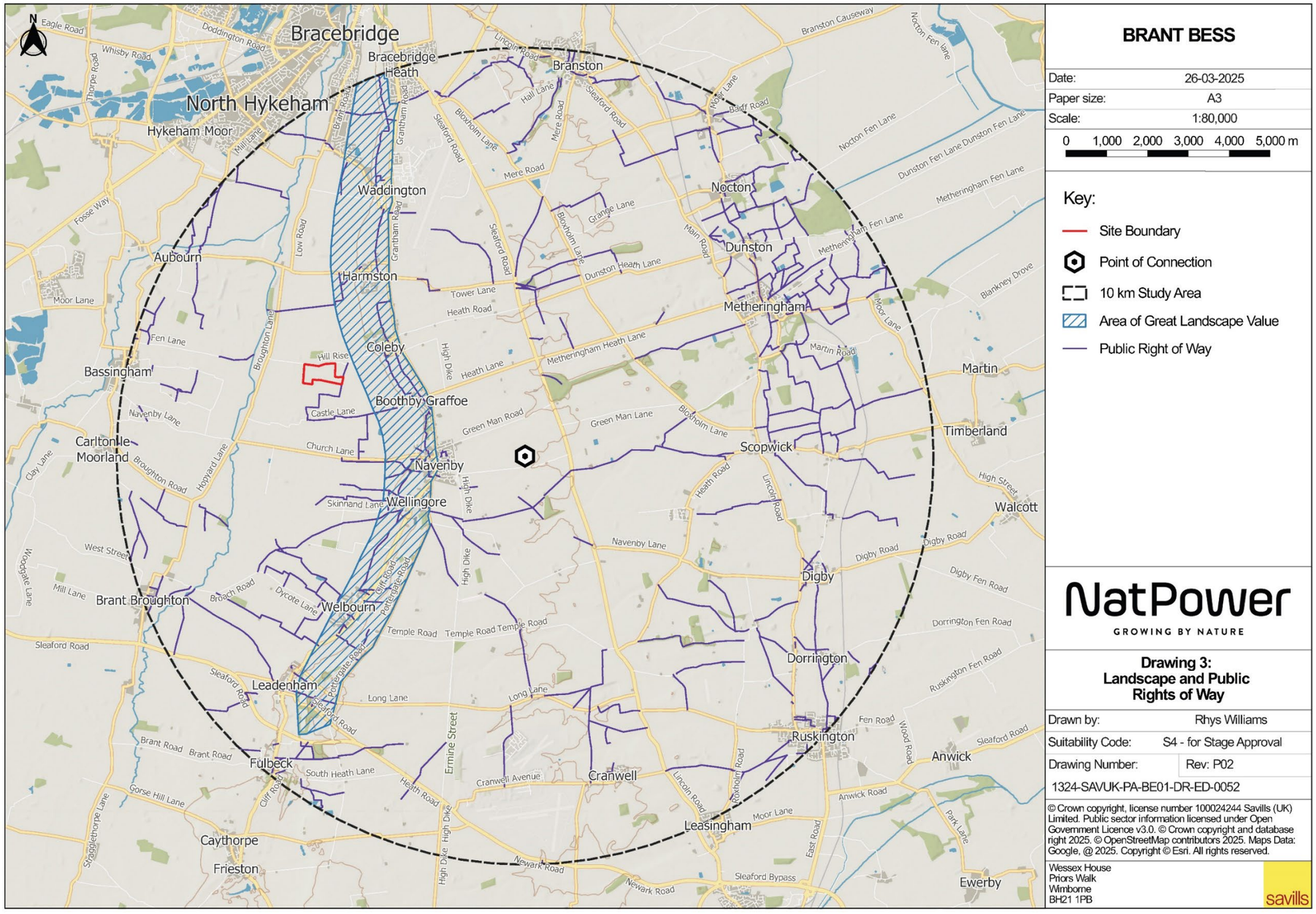
Drawing 2: Residential Properties and Settlement Boundaries

Drawn by:	Rhys Williams
Suitability Code:	S4 - for Stage Approval
Drawing Number:	Rev: P02
1324-SAVUK-PA-BE01-DR-ED-0051	

Wessex House
Priors Walk
Wimborne
BH21 1PB

savills

Appendix C.3 Landscape and Public Rights of Way



BRANT BESS

Date:	26-03-2025
Paper size:	A3
Scale:	1:80,000

0 1,000 2,000 3,000 4,000 5,000 m

Key:

- Site Boundary
- Point of Connection
- 10 km Study Area
- Area of Great Landscape Value
- Public Right of Way

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Drawing 3: Landscape and Public Rights of Way

Drawn by:	Rhys Williams
Suitability Code:	S4 - for Stage Approval
Drawing Number:	Rev: P02
1324-SAVUK-PA-BE01-DR-ED-0052	

Wessex House
Priors Walk
Wimborne
BH21 1PB
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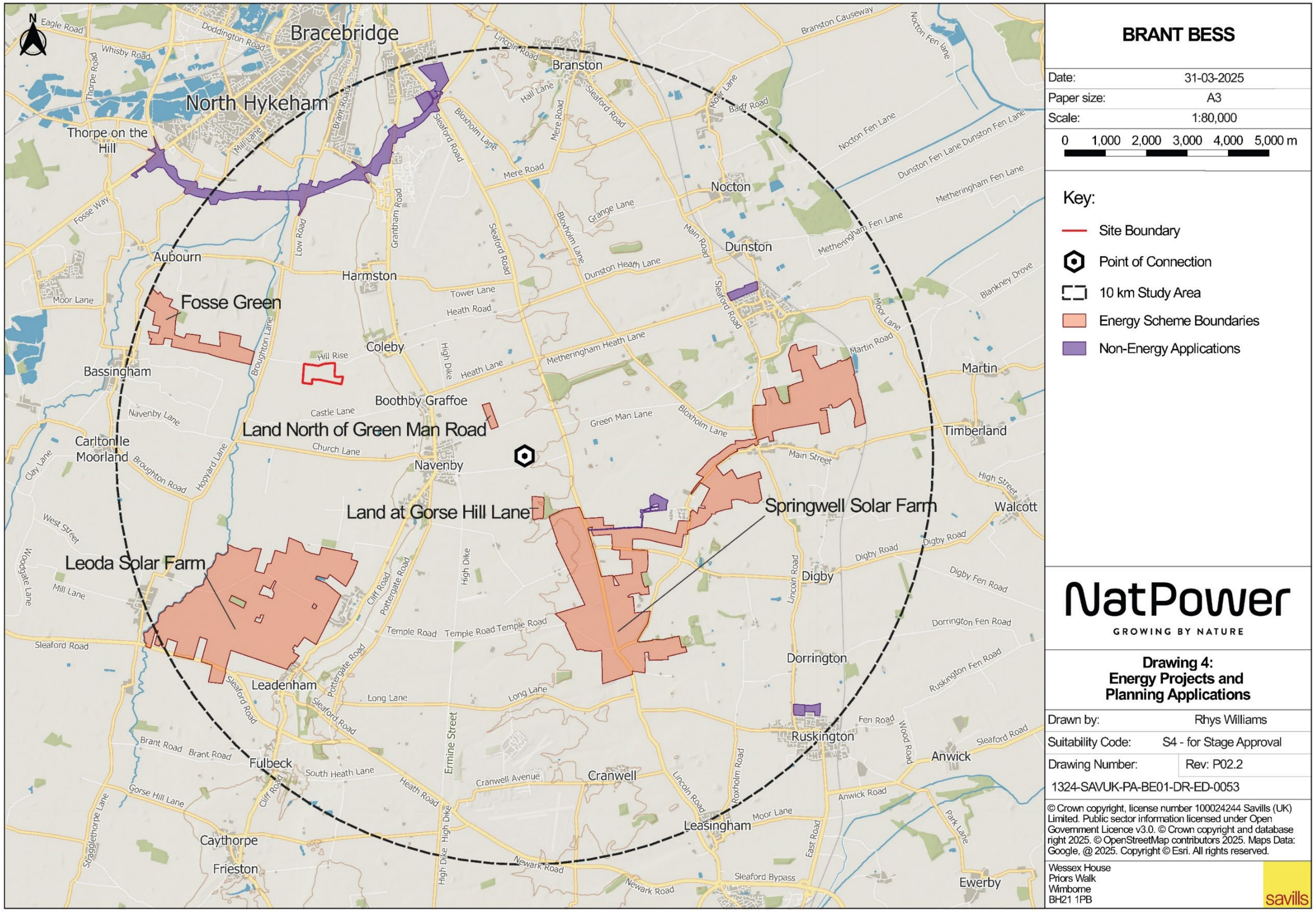
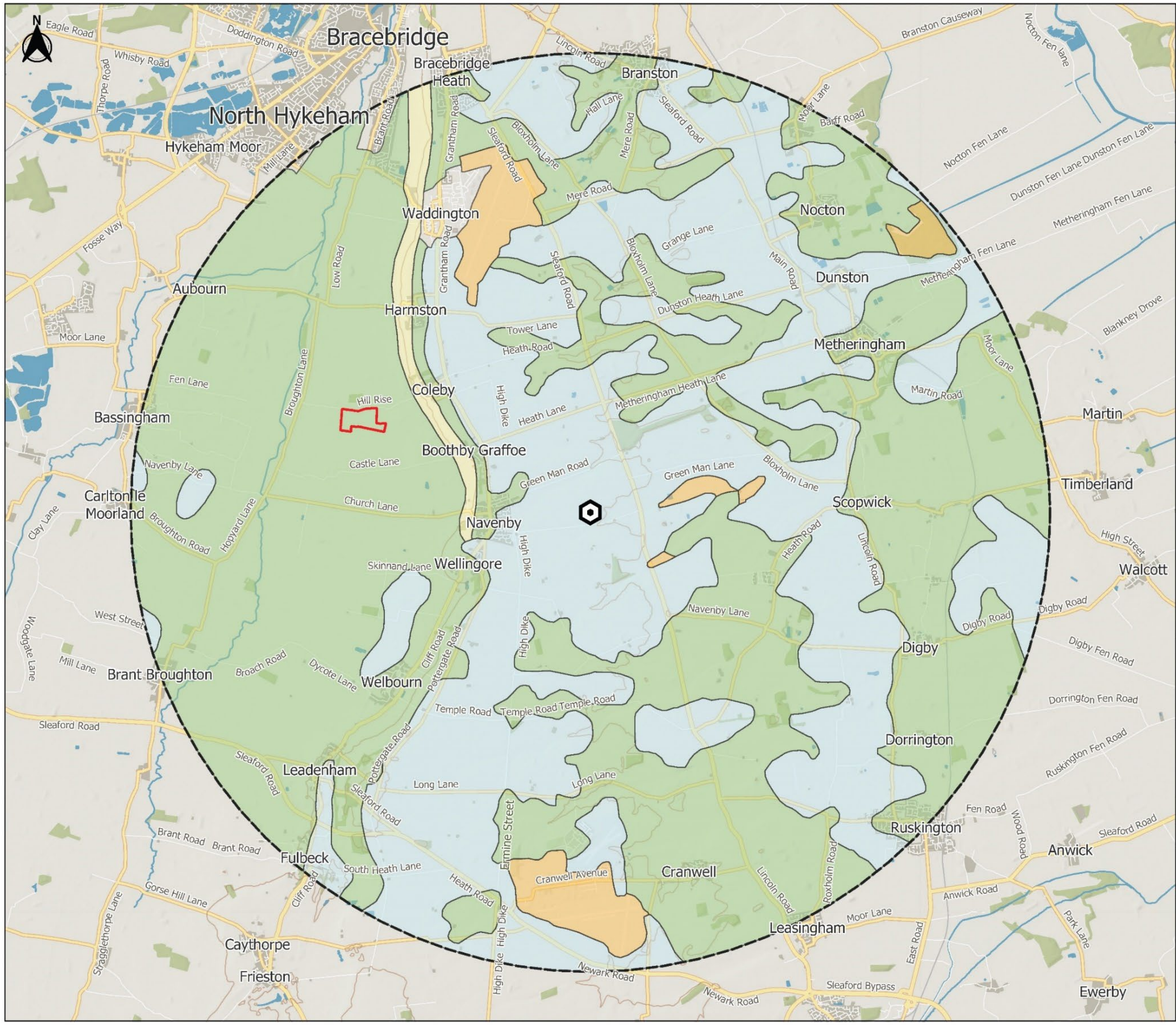
Appendix C.4 Energy Projects and Planning Applications



Appendix C.5 Agricultural Land



BRANT BESS

Date:	26-03-2025
Paper size:	A3
Scale:	1:80,000

0 1,000 2,000 3,000 4,000 5,000 m

Key:

- Site Boundary
- Point of Connection
- 10 km Study Area

Agricultural Land Classification

- GRADE 2
- GRADE 3
- GRADE 4
- NON AGRICULTURAL

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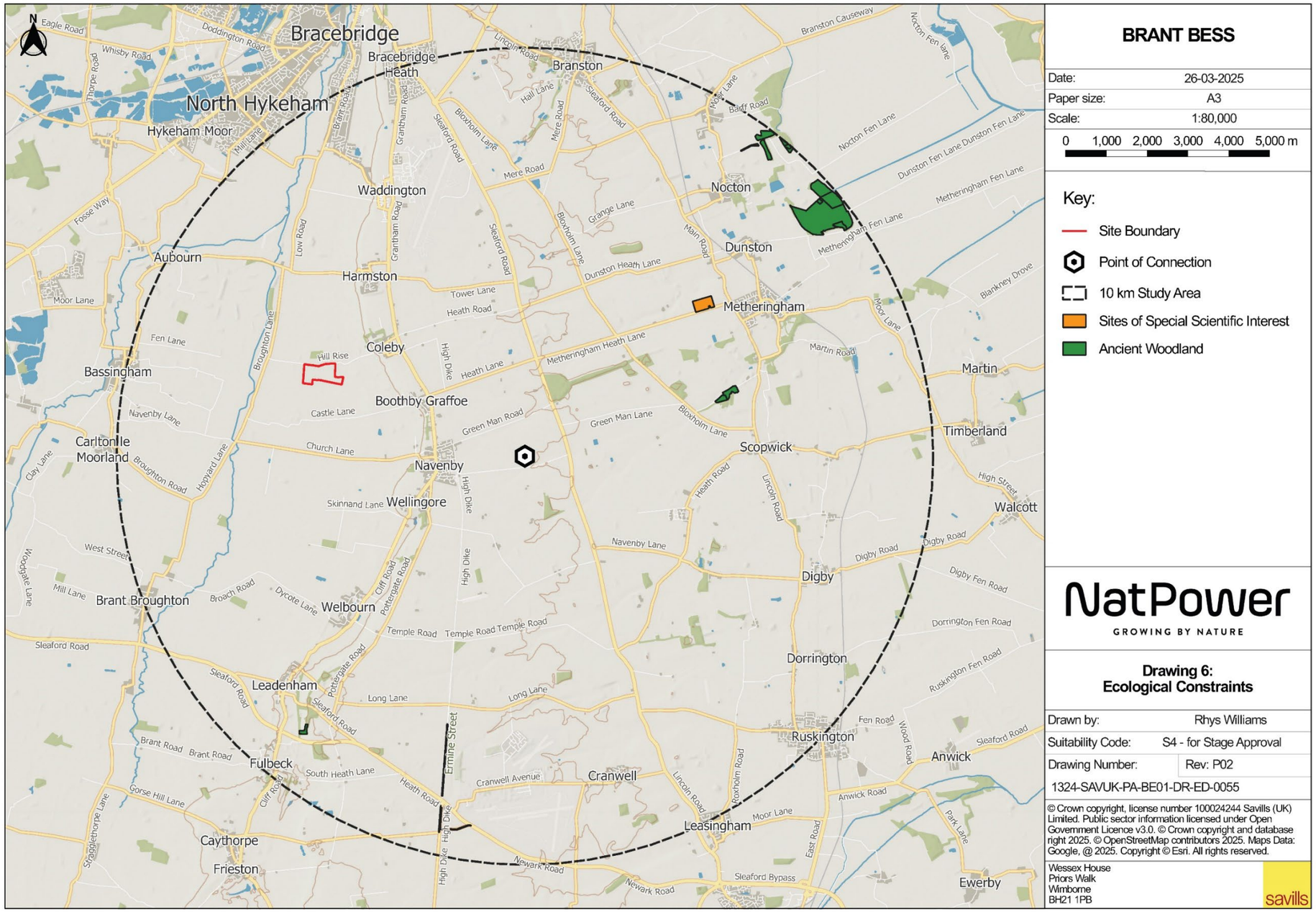
Drawing 5:
Agricultural Land

Drawn by:	Rhys Williams
Suitability Code:	S4 - for Stage Approval
Drawing Number:	Rev: P02
1324-SAVUK-PA-BE01-DR-ED-0054	

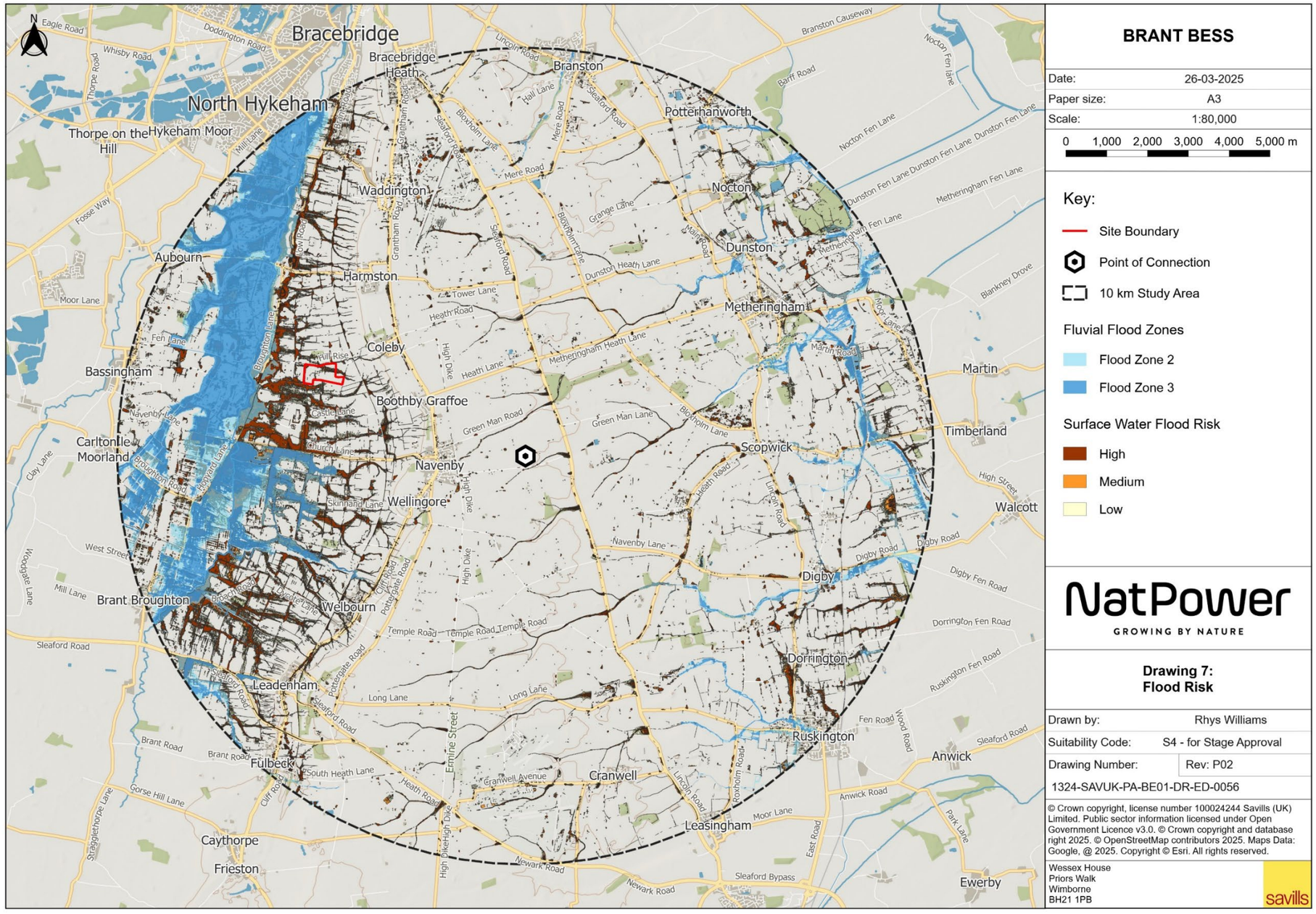
Wessex House
Priors Walk
Wimborne
BH21 1PB

savills

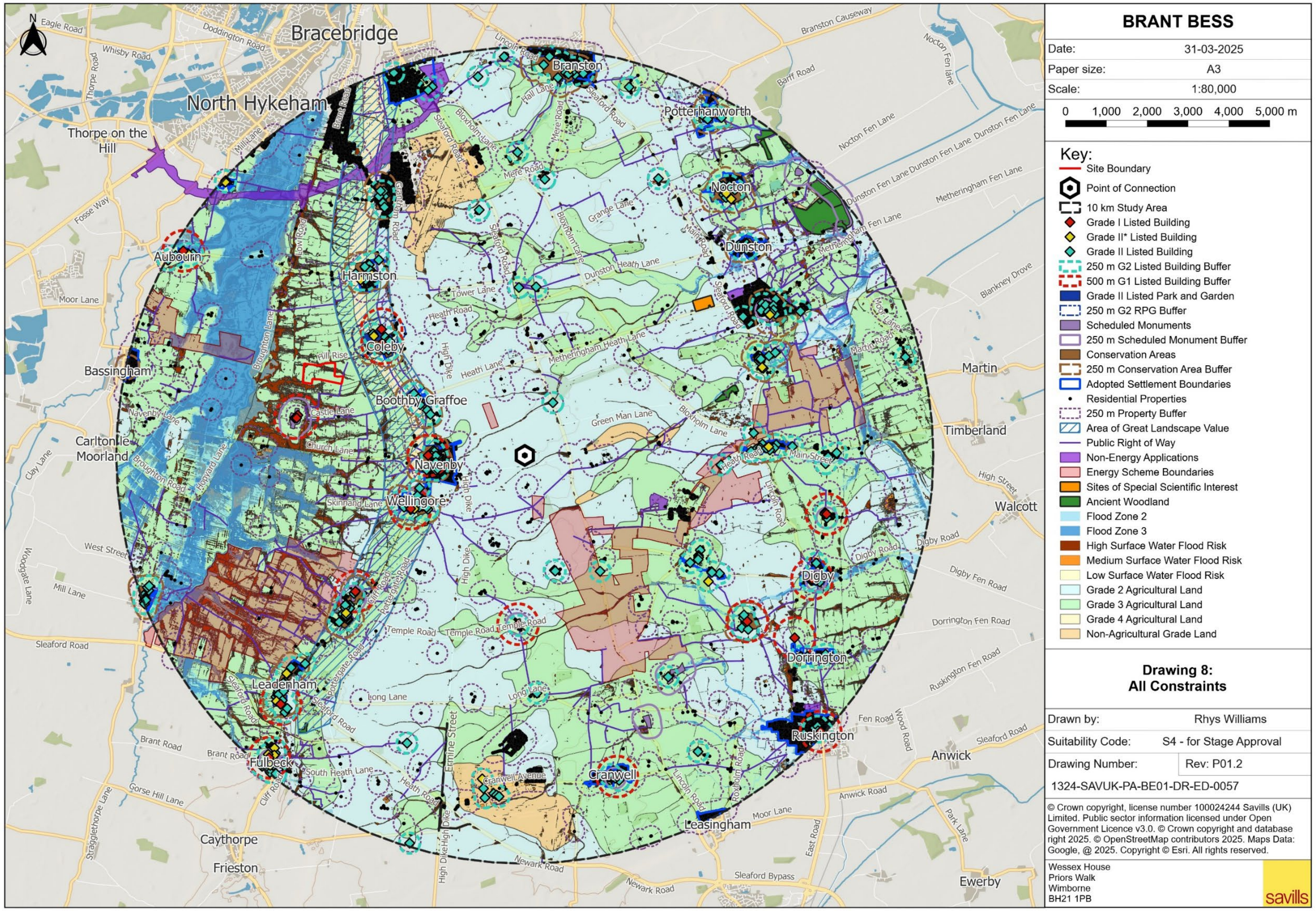
Appendix C.6 Ecological Constraints



Appendix C.7 Flood Risk



Appendix C.8 All Constraints



Appendix D
Expanded Cumulative Schemes

Brant Energy Storage Environmental Statement
NatPower

LUC

Figure D.1: Cumulative Schemes within the Greater Area

- Site Boundary
- 5km intervals
- 35km buffer

Proposed development status

Permitted

- EN010123, Heckington Fen Solar Farm NSIP
- 23/1447/CCC, North Hykeham Relief Road
- 24/1265/FUL, Little Hale BESS

Under determination

- 24/1470/FUL, Whitecross Lane Solar Farm
- EN010151, Beacon Fen Solar Farm NSIP

Scoping

- 23/0390/EIA/SCO, Green Man Road BESS
- 24/0075/EIASCR, Gorse Hill Lane BESS

Other

- 23/1021/FUL, Little Hale Drove Solar Farm
- 23/1419/FUL, Mareham Lane Solar Farm
- 24/1080/EIASCR, NGET Navenby Substation
- EN010154, Fosse Green Solar Farm NSIP
- EN0110016, Leoda Solar Farm NSIP
- Indicative underground cable corridor route

NORTH 23/1447/CCC
EN010154
Indicative underground cable corridor route
23/0390/EIA/SCO
24/1080/EIASCR
24/0075/EIASCR
Wellingore EN0110016
5km
10km
15km
20km
25km
30km
23/1419/FUL
24/1470/FUL
EN010123
EN010151
24/1265/FUL
23/1021/FUL

0 2 4 km

Map scale 1:125,000@A3

13135_Environmental_Statement_Copy/Fig2_2_Expanded_Cumulative_Schemes_r0_13135_A3L 14/04/2025

Appendix E

List of other BESS schemes without cable route

Table E.1 List of other BESS schemes without cable route

Project Name	Local Planning Authority	BESS Application/Appeal Reference	Cable Route Application/Appeal Reference	BESS Application status	If approved or refused, what reference does it make to grid connection and its importance in determining the application/assessing the public benefit.
Milou BESS	Wiltshire Council	PL/2022/00664 and APP/Y3940/W/23/3319392	PL/2024/05031	Appeal allowed (20/02/24)	BESS planning application reference : PL/2022/00664. Appeal allowed for '"a battery storage facility. The use of the site would change from agricultural to energy infrastructure". Notes that The proposed BSF would connect to the electricity grid at the MS where it is stated there is significant capacity to accommodate new inputs. The connection would be installed below ground.
Chapel Lane BESS	Walsall Metropolitan Borough Council	23/1286 and APP/V4630/W/24/3347424	Not yet submitted.	Appeal allowed 14/02/25	Council refused based on inappropriate development in green belt, overruled by inspector. Inspector noted that access to the local grid is biggest constraint facing the alternative energy supply and associated infrastructure industries. Sites need to be located close to a point of connection (POC) to the grid, so as to minimise the loss of energy during transmission and the grid must have capacity to absorb the electricity discharged at times of peak demand. The intended point of connection to the grid is some 550m from the site and then by existing underground cable to the Bustleholme sub-station.
Staythorpe BESS	Newark & Sherwood District Council	23/00317/FULM (not determined but granted planning permission subject to the completion of a S106 by Committee on the 19th of June 2024)	23/00810/FULM	Application permitted 20/06/24	From PS *'The proposed cable run is an essential infrastructure requirement needed to support the provision of a substantial renewable and sustainable form of electricity, which will also make a valuable contribution to the storage of electricity at a local level. The scheme would add to the region's progress in meeting its renewable energy target and would also assist in meeting national targets for both energy supply and low carbon energy development.'* *From PS 'Proximity to such existing infrastructure is important, given the manner in which energy is transferred into the National Grid, short connection routes are highly desirable, ensuring efficiency and speed of transmission when required.' 'It should be recognised that this the proposal is for essential infrastructure that is required to connect the proposed BESS to the National Grid*

Project Name	Local Planning Authority	BESS Application/Appeal Reference	Cable Route Application/Appeal Reference	BESS Application status	If approved or refused, what reference does it make to grid connection and its importance in determining the application/assessing the public benefit.
					and ensure that the stored energy can be consumed by energy users. The proposes development is therefore required in order to help reduce CO2 emissions and ensure the UK meets its reduction targets.' From officer report *'This cable infrastructure is required in order to allow the weighing of the benefits of application 23/00317/FULM because without this connection the proposed BESS could not operate. Equally, there would be no reason to implement this planning application, if the application for the BESS is rejected. However, having set out this intrinsic functional link, it is also important that each application is considered independently on its own merits. For example, it could theoretically arise where planning permission is refused for the BESS application but yet approved for this underground cable route. It would then be up to the applicant as to whether they choose to implement the cable permission or not.'* In reference to local energy policy 'This provides that the Council will promote the provision of renewable and low carbon energy generation within new development. Although the reference is specifically to energy 'generation' and this development would not generate energy in and of itself, it nevertheless would assist and facilitate a greater capacity of use of energy generated by renewable and low carbon energy sources through storage'.
CEL Sale BESS	Trafford Council	111105/FUL/23 and APP/Q4245/W/24/3343250	Unknown	Appeal allowed 18/09/24	From Appeal statement *'The appeal proposal has recently received a revised grid agreement confirming availability for a connection in the near term. This means that the proposed BESS could help towards meeting the net zero target relatively quickly. That is not the universal picture, as the appellant explained that future connections to the National Grid will be challenging, and applicants face a 10 year wait to connect to the grid due to existing capacity being exhausted. Hence, the appellant's ability to connect the proposed BESS to the National Grid is a significant*

Project Name	Local Planning Authority	BESS Application/Appeal Reference	Cable Route Application/Appeal Reference	BESS Application status	If approved or refused, what reference does it make to grid connection and its importance in determining the application/assessing the public benefit.
					and important factor. Thus, schemes that have secured connections are fundamental to achieving Net Zero targets given the increased requirement for storage capacity'.
Pound Road BESS	East Devon District Council	22/2216/MFUL and APP/U1105/W/23/3319803	N/A	Appeal dismissed 1/11/23	From appeal statement 'Moreover, battery storage is linked to the national grid power supply and there needs to be an appropriate connection point, which has sufficient capacity to deal with the power involved. Whilst this site does meet the above considerations, the submitted evidence does not show a detailed consideration of alternative sites. However, bearing in mind the very particular requirements for suitable sites and the level of landscape harm arising, I give this only very limited weight'.
Greener Grid Park	Bromsgrove District Council	21/00195/FUL	24/00387/FUL	Approved 09/02/21 and cable approved 17/04/24	From PS 'The wider need for the GGP was established in the previous application and approved through Planning Permission reference 21/00195/FUL and is not repeated here however, the wider economic and social benefits of the GGP are echoed in relation to the need for the Proposed Development'. From committee report 'The development has been proposed strategically sited adjacent to the National Grid Feckenham Substation which lies immediately to the west of the site. Given the proximity to the substation, lengthy transmission cables will not be required, ensuring efficient connection to the National Grid, minimising disturbance, and costs'.

E.2