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DEVELOPMENT CONSULTING



Planning Statement

Misslebrooks

Battery Energy Storage System (BESS)





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1.0 Introduction

1.1 Scope

- 1.1.1 This Planning Statement is prepared on behalf of Boom Developments Limited in support of a planning application for a Battery Energy Storage System (BESS) on land at Misslebrooks, south east of North Baddesley.
- 1.1.2 The proposals are presented by Lighthouse Development Consulting on behalf of Boom Developments Ltd (www.boom-power.co.uk), an experienced renewable energy developer who take a long term interest in the construction, ownership and operation of their projects.
- 1.1.3 The site sits within the corner of a larger triangular shaped field alongside Botley Road between Chilworth and North Baddesley. The facility would connect to a nearby main electricity substation to the east of the site via a trenched cable run under the highway. Proximity to the substation is therefore essential.
- 1.1.4 The proposed development would be for a battery electrical storage system (BESS), together with substation, transformer stations, site accesses, internal access tracks, security measures, access gates, other ancillary infrastructure and landscaping and biodiversity enhancements. The development represents an essential component of the UK's renewable energy infrastructure to meet net zero emissions. The system serves to flatten out the 'peaks and troughs' of renewable energy production to ensure renewable energy is available at all times, not just during daylight hours or when its windy.

1.2 Summary

- 1.2.1 The proposal represents a form of low carbon development which would facilitate the efficient operation of the electricity grid and maximise the efficiency of renewable energy generation on the network.
- 1.2.2 The development provides for electrical storage in batteries that can be charged when there is surplus capacity on the grid and then deploy the stored power when there is capacity for the grid to accommodate the electrical energy.
- 1.2.3 The scheme has been designed to be sensitively sited to avoid harmful impacts on the character and appearance of the area. Key to this is a well-designed landscaping scheme which provides extensive



species rich planting and tree planting which provides structural landscaping and also delivers a net gain in biodiversity.

1.3 Structure of Statement

- 1.3.1 This Planning Statement describes the site and explains key details relating to the proposed development. It explains the process of site selection and why the site is suitable to accommodate the proposed scheme.
- 1.3.2 The document outlines how the development would make a valued and important contribution to address the challenges of climate change and energy security.
- 1.3.3 The Statement then sets out the relevant national and local planning policy as well as other material planning considerations including the Climate Emergency and Action Plan declared by Test Valley Borough Council.
- 1.3.4 The Statement continues to assess the proposals against this policy context, covering all material planning considerations of relevance to the application.
- 1.3.5 It explains how the development is fully compliant with the provisions of the statutory development plan, and justifies the reasons why planning permission should be granted in this instance.



2.0 Site Description

2.1 The Site

- 2.1.1 The application site occupies the north west corner of an agricultural field between Chilworth and North Baddesley that is bounded to the west by Botley Road and the east by Misslebrook Lane. Access to the site is provided by a field gate on Botley Road with a short section of track providing access to the proposed battery storage compound.
- 2.1.2 A transmission cable will connect the facility to the Velmore Substation on Bournemouth Road in Chandlers Ford to the northeast of the site. The cable would be trenched below ground and beneath the highway.
- 2.1.3 The site area extends to a total of 16.91 acres and is shown below on both Figure 1 and Figure 2.

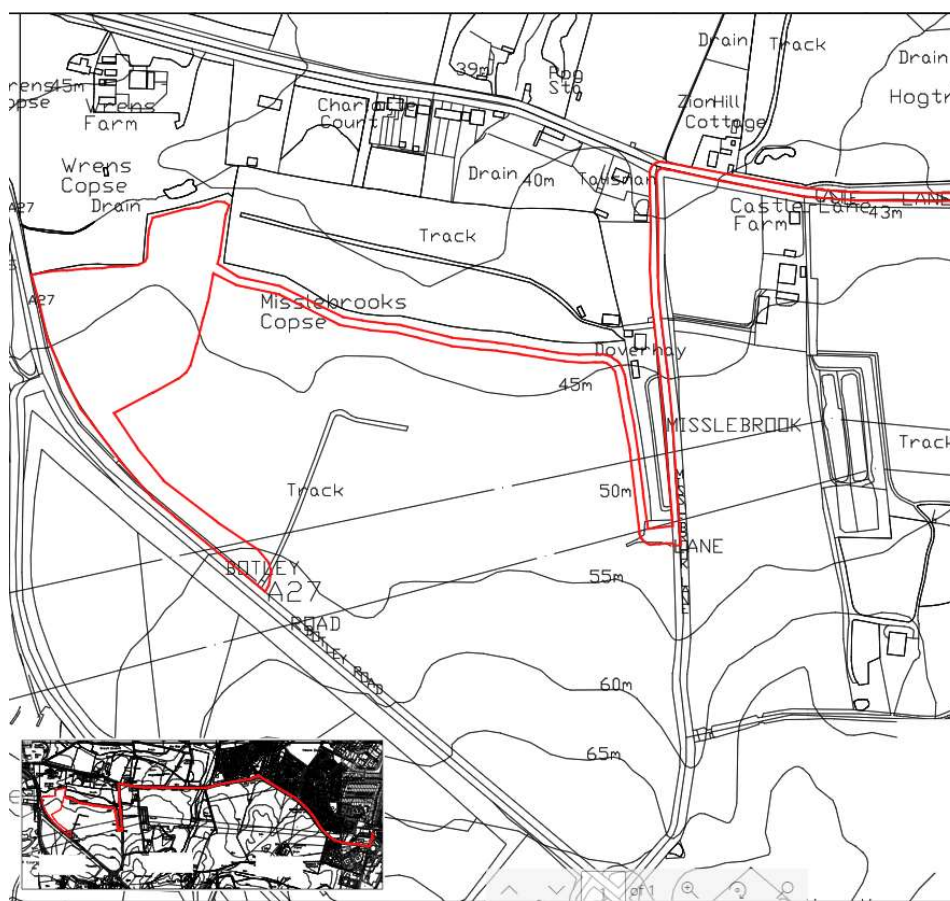


Figure 1 Site Location Plan focused upon battery storage area

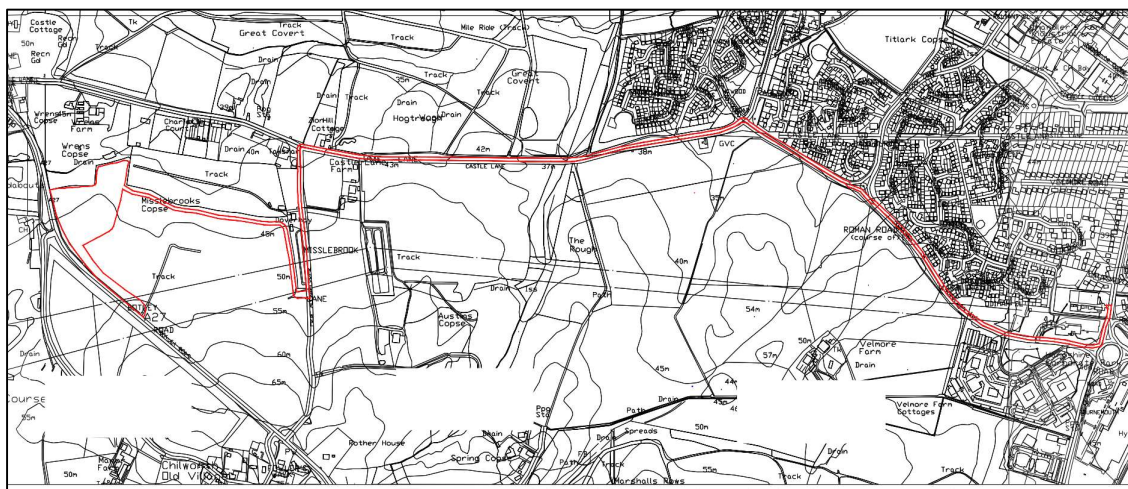


Figure 2 Proposed Site Location including cable route

2.2 Surroundings

2.2.1 The site occupies a relatively small portion of a large field between Chilworth and North Baddesley. The site is well enclosed by existing mature hedgerow planting along the south-western boundary and by a large block of established woodland to the north. These provide a good level of existing visual screening of the site from public vantage points along the Botley Road. The photograph below shows the site boundary as viewed during winter from the junction to Chilworth Golf Club on Botley Road and reveals the extent of natural screening and the presence of transmission infrastructure within the area



Figure 3 Photograph of the site from Botley Road, adjacent to Chilworth Golf Club



- 2.2.2 The site has a semi-rural character as despite lying within a large, open field with adjacent woodland, it is in close proximity to two nearby settlements and to the north of the larger urban conurbation of Southampton. Nearby development in the form of roads, housing and pylons serve to detract from the otherwise rural character of the immediate site location and it is notable that the M27 motorway can be heard from the site, revealing the site's wider context.
- 2.2.3 The site does not lie within any statutorily designated landscape including AONB or National Park and it does not lie within a designated Green Belt. It is not considered to be environmentally sensitive as the site is not within or adjacent to any ecological land designation such as SSSI, Special Area of Conservation (SAC), Special Protection Area or other wildlife reserve.
- 2.2.4 There are no Public Rights of Way within the application site or immediately adjacent to the site boundary.
- 2.2.5 The site lies wholly within Flood Zone 1, which has the lowest probability of flooding and is where development should be directed.
- 2.2.6 The application has been supported by an Archaeology and Heritage Assessment which identifies that there are no designated heritage assets within or close to the site. Figure 4 below identifies heritage assets in the wider surrounding area which have been assessed.

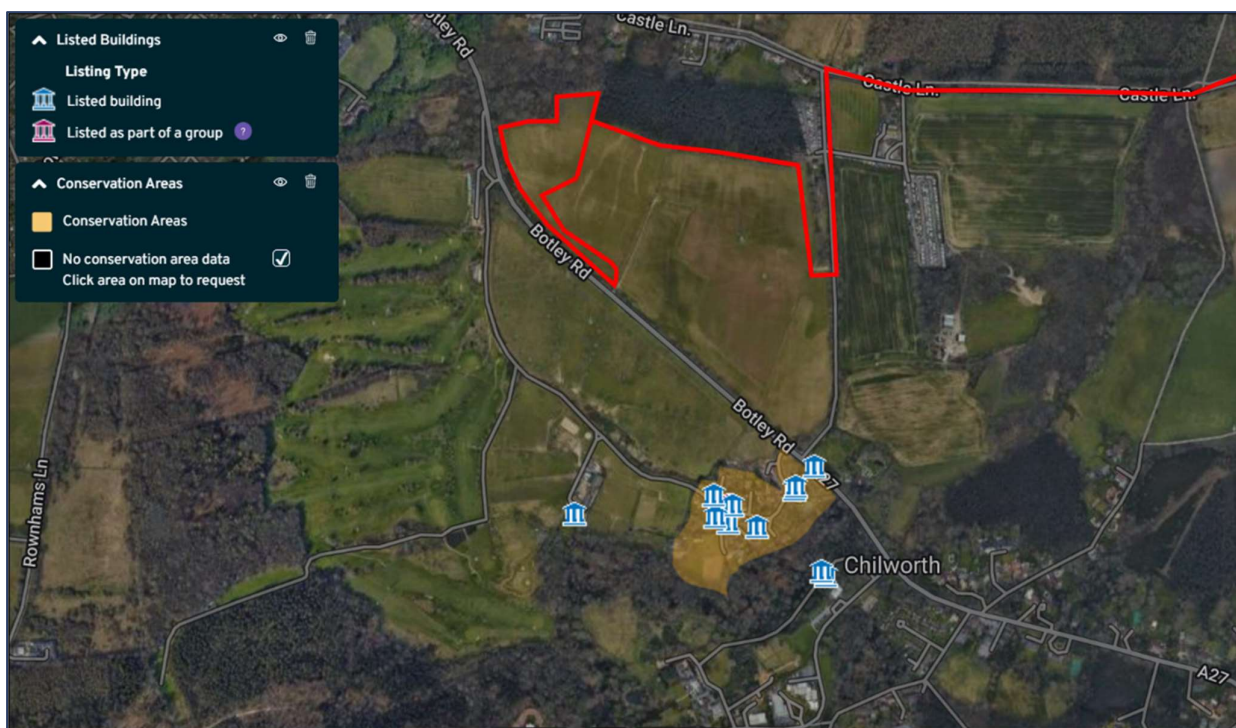


Figure 4 Site's proximity to nearby heritage assets



3.0 Development Proposal

3.1 Energy Storage – An Introduction

3.1.1 Battery storage technologies are increasingly recognised as essential to speeding up the replacement of fossil fuels with renewable energy and playing a pivotal role between green energy supplies and responding to electricity demands.

3.1.2 The Government's Department for Business, Energy and Industrial Strategy (DBEIS) have clearly explained the importance of Energy Storage in enabling the balancing of our electricity supply and optimising the potential for energy generation from renewable sources. The latest Industrial Strategy states that:

“Electricity storage, simply put, stores electricity for when it is needed. It is essential to a net zero system as it can store electricity when it is abundant (e.g. when it is windy or sunny) for periods when it is scarce (e.g. when demand is higher). It can do this both to balance the system nationally, and to manage constraints in local areas. It can also provide specific services to help maintain the resilience and stability of the grid. The need for electricity storage will rise as we increase the volume of variable, non-dispatchable renewables on the system and increase peak demand through the electrification of heat and transport. It will be critical to maintaining energy security as we shift away from gas over the 2020s-30s.”¹

3.1.3 In recognition of the importance of electrical storage in moving to net-zero carbon by 2050 (as required by the Climate Change Act 2008), and the interim target of 78% reduction in emissions by 2035 (required by the 6th Carbon Budget), the Government have recently introduced legislative changes to encourage larger and more effective BESS to be processed by local planning authorities (LPA). Previously, proposals for electrical storage above 50MW were subject to approval through the National Significant Infrastructure Projects (NSIP) procedure. However, since December 2020, such proposals are now to be assessed by LPAs. In doing so the Government stated that:

“the planning impacts of the types of storage being deployed (predominantly batteries), are much lower

¹ Transitioning to a net zero energy system Smart Systems and Flexibility Plan 2021, Department for Business, Energy & Industrial Strategy, July 2021.



than other forms of generation”.

Indeed, battery electrical storage systems have much smaller footprints, low vertical extents, no outwardly moving parts and limited noise effects compared to all other forms of electrical energy generation.

- 3.1.4 The proposals would also relieve development pressure from prospective installations of other, more land-hungry renewable energy schemes. This is because there is currently a lack of effective energy storage within the UK and consequently, many renewable installations are effectively over-installed in relation to the capacity of the grid taking the power. This is done as an attempt to maximise the use of the available grid capacity during sub-optimal periods, but results in an over-supply at peak times, meaning that many renewable systems (wind and solar) are increasingly having to switch off (curtail) in order to prevent damage to the grid. This is of course very inefficient and has resulted in the loss of approximately 13% of total wind energy generation – enough for 800,000 homes and costing £806 million between 2020-2021 . Battery storage would allow much of this energy to be captured and would disincentivise this inefficient approach to installing above capacity.

3.2 Proposed development

- 3.2.1 The proposed development consists of the Installation of battery energy storage, together with substation, transformer stations, site accesses, internal access tracks, security measures, access gates, other ancillary infrastructure and landscaping and biodiversity enhancements Figure 5 below details the layout plan.

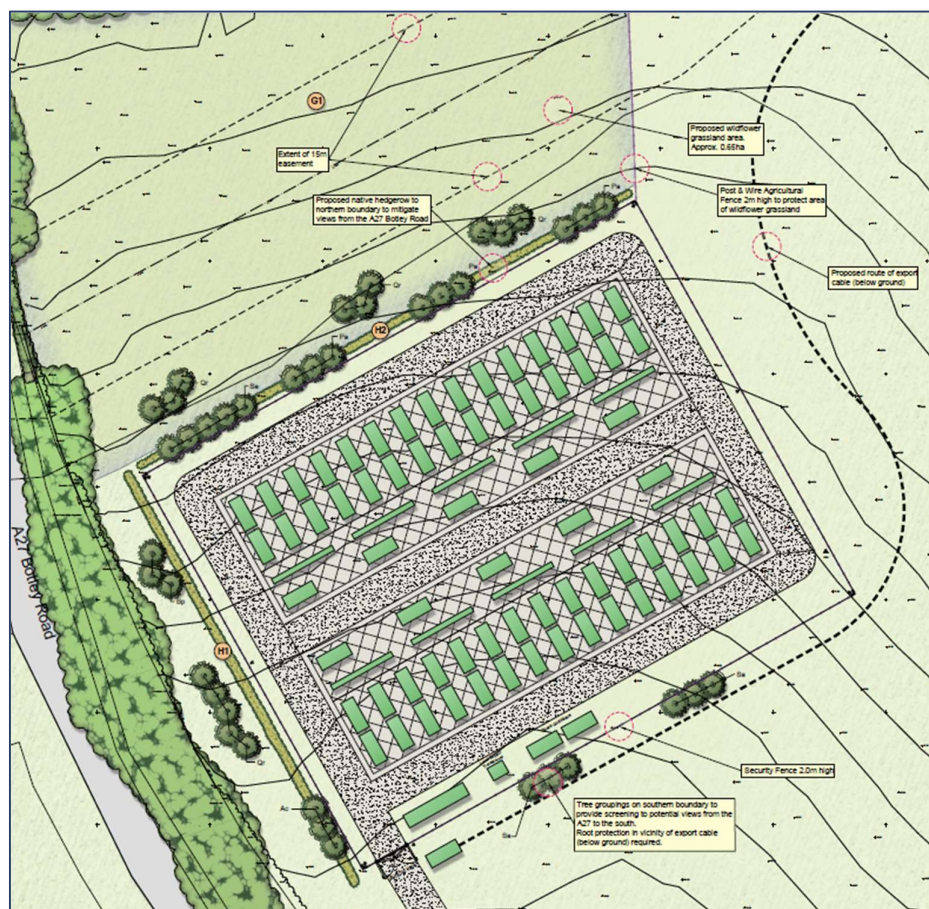


Figure 5 Proposed Site Layout Plan including landscaping proposals

3.2.2 The Battery Energy Storage System (BESS) would sit within an enclosed compound area containing 60 battery containers, each measuring approximately 6.1 metres in length, 2.5 metres wide and 3.2 metres in height, taking account of the 300mm footings. The elevation drawings below show the proposed battery units, DC inverter Units and the palisade fence which would surround the main compound.

3.2.3 The location of the compound is offset from the existing woodland in the north for three main reasons:

- 1) To avoid conflict with a water pipe that has been identified in this area and preserve the necessary easement to allow access to this infrastructure
- 2) To avoid prospective impacts upon the ecology of the woodland
- 3) To allow the creation of a wildflower meadow in this area, which would be better protected from grazing sheep within the wider field alongside the planned battery development

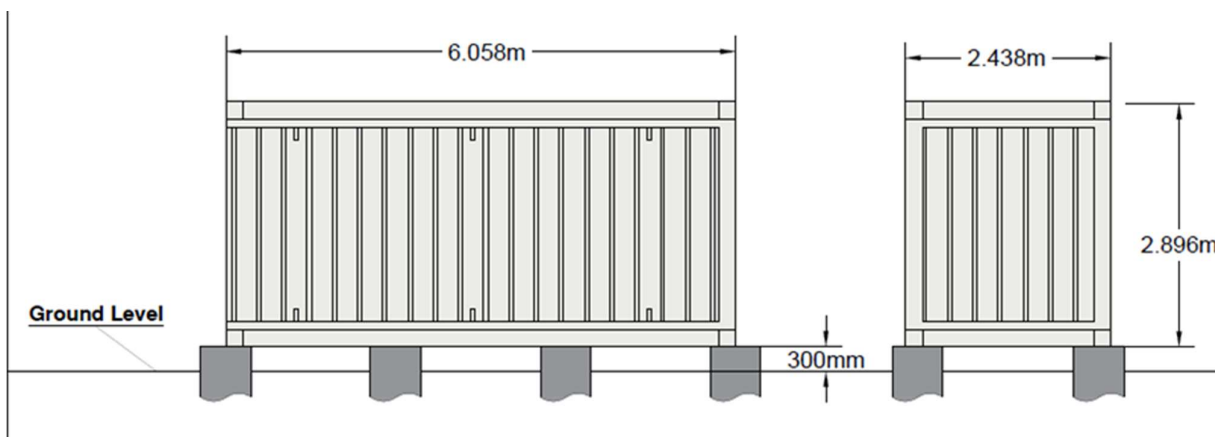


Figure 6 Elevation drawing showing dimensions of proposed battery unit

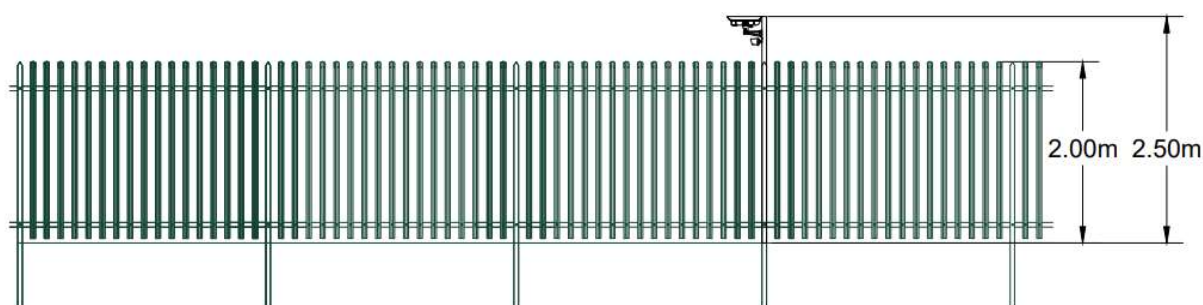


Figure 7 Indicative Elevation showing fencing and security camera



Figure 8 Combined DC Panel Box and Inverter Units



- 3.2.4 The development is proposed to be a ‘temporary installation’ being operational for a period of 40 years, after which the site would be restored to its current agricultural function. The development would not therefore change the planning status of the land to create ‘brownfield conditions’ for any subsequent development. As such the long term agricultural land use would be preserved.
- 3.2.5 The proposal would provide capacity to store around 114MWh’s of energy, allowing discharge of power for a period up to 2 hours. The facility would connect to the nearby electricity substation to the east of the site via a trenched cable run beneath the highway.
- 3.2.6 The containers will provide housing for battery infrastructure, a power distribution system, and auxiliary systems such as fire suppression and alarm systems, ventilation, and cooling system. The site area will be enclosed within a palisade fence but contained within extensive landscaping that connects to the existing woodland.
- 3.2.7 The site would be served by a track formed from crushed aggregate ensuring it remains fully permeable and reversible. Once operational the site would require negligible traffic movements and would be monitored remotely in order to detect system failure, crime or other defects.

Environmental Enhancements

- 3.2.8 The proposals have been carefully sited and designed in order to work with the existing landscape in order to deliver key benefits in reducing the visual impacts of the proposals and providing ecological benefits above baseline conditions.
- 3.2.9 The proposals include planting of trees and hedgerow around the northern, southern and western perimeter of the battery compound and within the gaps of the existing field boundary. This planting would strengthen the existing habitat connectivity and would screen the proposals from the adjacent highway, particularly as the planting becomes established beyond year 5 of its implementation.
- 3.2.10 On the land to the north of the battery compound there is 1.1 acre wildflower meadow (0.45 ha) would be planted, delivering a biodiversity net gain of approximately 15%. The ongoing management of these features would be secured as part of any planning permission granted for the development and the responsibility would be held by the developer, with no costs being incurred by the Local Authority.



4.0 Planning History and Relevant Planning Appeals

4.1 Site specific history

- 4.1.1 A search of the local planning history reveals no planning applications being made on the site itself.

4.2 Planning Appeal Precedence

- 4.2.1 Of particular relevance to these proposals is Planning Appeal – APPC/3430/W/22/3292837, which was determined on 16th August 2022 and under the prevailing planning policy context at a National level.

- 4.2.2 The site for this appeal was located on land West of Wolverhampton West Primary Substation, Wolverhampton, WV4 4XX. The development considered was a comparable battery based electrical storage scheme with associated infrastructure, together with access improvements, security measures and landscaping works.

- 4.2.3 In assessing the proposed scheme within the context of the current National Policy context, the Independent Planning Inspector concluded that:

“The provision of low carbon energy is central to the economic, social and environmental dimensions of sustainable development set out in the Framework. There is strong national policy support, from the Government’s Energy White Paper (EWP) and National Policy Statement EN-12 (NPS), for the development of battery storage, which would aid in the storage of energy generated from renewable sources which by their nature, intermittently generate energy. Additionally, the NPS advises that storage is needed to reduce the costs of electricity and increase its reliability.

National Grid’s Future Energy Scenarios (2021) advises that currently the energy storage capacity in the UK is 4GW and by 2050 it is anticipated that 40GW of capacity would be required in order to meet the UK’s target of net zero carbon by 2050. Although the scheme is modest in size, paragraph 158 of the Framework confirms that even ‘small-scale projects provide a valuable contribution to cutting greenhouse gas emissions.’

- 4.2.4 This appeal decision clearly establishes that Battery Energy Storage Systems (BESS) are low carbon development for planning purposes. Furthermore, it can clearly be seen in this appeal decision that the energy storage benefit must be given substantial weight in the planning balance on the basis of a



significant need for the deployment of this technology to help address climate change and improve energy security.

5.0 Need for the Development and Associated Benefits

5.1 Need for BESS as a Low-Carbon form of development

- 5.1.1 Paragraph 158 of the NPPF is clear that local planning authorities should not require applicants to demonstrate the overall need for renewable or low carbon energy (and BESS is established through appeal as constituting low carbon energy) and recognises that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions.
- 5.1.2 Notwithstanding the absence of any specific policy obligation to demonstrate a need for the development, it is useful to provide some context which explains why energy storage developments are so urgently required to aide the transition to a low-carbon economy.
- 5.1.3 As renewable energy comes on stream through wind energy and large scale solar it needs to connect into the country's existing electricity grid. The cyclical nature of renewable energy, insofar as being generated during fine sunny weather or windy periods, results in too much power supply to be accommodated immediately within the grid at certain times. Energy supply is therefore restricted during these periods resulting in significant losses through the curtailment of renewable generators and the lost energy which would otherwise have been generated.
- 5.1.4 This phenomena represents a clear challenge to the deployment of renewable energy and recent research has shown that between 2015 and 2021, in the UK, 13% of the total wind energy generated was curtailed. It is also a growing issue as more renewable generators are connected to the grid and in 2020/21 enough energy to power 800k homes was curtailed.
- 5.1.5 The need to optimise the use of both planned and existing renewable energy assets is essential not only as a means of combatting climate change, but also to secure our own domestic energy supply with various factors exacerbating the current pressure on the grid, including:
- The current energy crisis resulting from restricted foreign gas supplies



- The increased political pressure to ensure a self-sufficient supply of UK domestic energy
- The transition to Electric Vehicles which is projected to increase electricity demand in the transport sector
- The move away from gas boilers and an increased pressure on domestic heating supply

5.1.6 BESS are designed to store excess energy that is generated and release this power to match demand on the network in real time. In recognition of this key function, the above planning appeal decision (APPC/3430/W/22/3292837) confirms that grid attached battery storage represent a low carbon form of development that helps to facilitate renewable energy and reduce reliance on non-renewable sources of energy, thereby reducing carbon emissions.

5.2 Benefits Statement

5.2.1 The benefits of energy storage are extensive and can be categorised into Environmental, Economic and Social strands which represent the three objectives of sustainable development in accordance with Paragraph 8 of the National Planning Policy Framework (NPPF).

5.2.2 These are summarised below and serve to demonstrate the significant benefits of the proposals, many of which might not appear to be immediately apparent or tangible when first considering the proposals.

Environmental

5.2.3 Test Valley Borough Council have declared a Climate Emergency in 2019 and subsequently adopted an Action Plan in 2020. This seeks to increase the opportunities of local renewable energy sources and help to move towards low carbon energy sources, thereby reducing emissions.

5.2.4 This development will make an important contribution to the delivery of low carbon and renewable energy projects and is consistent with objectives of the Test Valley Borough Council Climate Emergency Action Plan.

5.2.5 The development would serve to optimise the generational capacity of the existing renewable energy generation connected to the network by capturing the energy stored during periods when the capacity of the electricity grid has been reached and preventing potential curtailment of such generating stations.



- 5.2.6 This power could then be redeployed at times when there is available capacity on the grid, including times when renewable energy generators are not operational (e.g. when there is no available wind or solar resource). This has the potential to off-set the use of fossil fuel generated power from sources such as coal and gas.
- 5.2.7 Conversely, the development would limit the need for other forms of energy storage from non-renewable sources which often rely on either natural gas or diesel generators.
- 5.2.8 The proposals would deliver a measurable Biodiversity Net Gain (BNG) as measured by the Natural England Metric methodology. The proposed landscaping measures therefore serve a dual purpose in screening the site and increasing the ecological value of the immediate site area.

Economic

- 5.2.9 As explained above, the curtailment of renewable energy in 2020/21 was enough to power 800k homes. As such, the ability to capture energy which would otherwise be lost due to the limited capacity of the grid is a significant, direct economic benefit and represents an overall increase of energy supply to the network. This increased supply is crucial to meeting the increased demand which is projected on the network, notably with the increased uptake of electric vehicles and reduced usage of gas boilers for domestic heating.
- 5.2.10 The fluctuation in energy supply from renewable energy also has considerable implications to the wholesale price of electricity. In instances where the demand on the network exceeds the overall supply there is a need to increase the deployment of energy from non-renewable sources, including from imported oil and gas markets. This results in increased consumer energy prices at peak times and can result in unaffordable energy prices and fuel poverty. The ability to more closely align energy supply with demand on the network would therefore help to reduce the fluctuations in energy pricing and allow for a more sustainable pricing model for consumers.
- 5.2.11 Ensuring a consistent, reliable energy supply would also provide clear economic benefits to local businesses and services and would provide certainty as to the ongoing sustainability of such services.
- 5.2.12 The proposals would be delivered without the need for any government subsidy.



5.2.13 The development itself would also provide some considerable on-site economic benefits in the following ways:

- As a diversification of the wider agricultural enterprise, supporting the farming enterprise whilst occupying a relatively small proportion of the overall agricultural holding
- During the construction phase as both specialist workers and local labour would be utilised to deliver the various aspects of the development.
- Notwithstanding the low maintenance requirements of the installation, the ongoing management of the facility and the associated landscaping would support the wider employment of various professionals including local contractors

Social

5.2.14 The proposals would also help to support the supply of electricity on the local electricity network at a time when National Grid have had to consider extreme options for managing their supply, including potential power outages.

5.2.15 The potential for such outages are a real prospect in the context of the current challenges faced, with restricted supply of natural gas from volatile foreign markets and increased demands on the network, particularly during cold periods.

5.2.16 The demand for electricity is increasingly interwoven with all facets of contemporary society. Power outages would therefore cause significant impacts upon society with both businesses and local services being affected. The consequences of this disruption could manifest itself in a variety of ways and would undermine many of the services and social opportunities which we take for granted.

5.2.17 The ability to store and deploy electricity for a 3 hour period on demand represents a significant benefit which would help to support the sustainability of all aspects of social life in the UK and contribute towards safeguarding energy security within the UK.



6.0 Site Selection

6.1 A Suitable Site Criteria

6.1.1 There are a number of locational constraints associated with the deployment of energy storage facilities in order for a project to be suitable in planning policy terms, technically feasible and commercially viable.

These include the following criteria:

- It must be located in an area where there is adequate capacity on the local electricity network to accommodate the scheme
- Be within viable proximity to a substation with available demand capacity
- Be on relatively flat ground and with suitable ground conditions
- Outside of the Flood Zone or an area at risk from coastal erosion
- Be located on a site with a landowner willing to accommodate the project for the planned duration timeframe
- Be located away from any particular ecologically sensitive sites or features
- It should avoid sensitive landscape designations including AONB, National Park and Green Belt land where possible
- Be located away from sensitive historic environment features so as to avoid either direct impacts to below ground resource or upon the setting of other features such as listed buildings
- Be sited at sufficient distance from noise sensitive receptors in order to prevent any undue impacts on residential amenity
- Benefit from suitable access for construction and ongoing maintenance purposes

6.1.2 When searching for a site there are few locations that fulfil this criteria and are also available.. However all of these criteria are fulfilled at this site location and it is available for the development .



6.2 Prospective Brownfield Alternatives

- 6.2.1 In accordance with best practice, a review of prospective brownfield sites was also undertaken to ensure that there were not any sites that were alternative sites that would be suitable, viable or available in the locality.
- 6.2.2 The Brownfield Land register provides a reliable source of brownfield sites and forms the starting point of an alternative site search. Once these sites are identified, an assessment of the site's suitability, viability, and availability is undertaken.
- 6.2.3 The above criteria are used when assessing a site's suitability. In terms of the search areas this is limited to within 5km from the substation, noting the significant costs associated with installing the cable beyond this radius and the resultant transmission losses which would likely render such sites as unviable.
- 6.2.4 Figure 9 below identifies the 5km from the site which is the area of search in relation to sites on the Brownfield Register.



Figure 9. 5KM buffer from site forming the basis of a search for an alternative brownfield site location

- 6.2.5 From the 5km radius from a review of the Test Valley Borough Council Brownfield Register as well as Southampton City Council's Brownfield Register has been undertaken to identify any available sites.
- 6.2.6 Table 1 below identifies the sites listed within the 2020 Test Valley Brownfield Register. None of these are located within the 5km radius of the Velmore Substation.



<u>Site</u>	<u>Within 5KM</u>
Andover Station freight yard, Andover, Hampshire	No
Land at Hyde Farm, Horsebridge Road, Broughton, Hampshire	No
Abbots Manor Farmyard, Leckford, Hampshire	No
Land north of Walworth Road, west of the Commercial Centre, Andover, Hampshire	No
George Yard and Black Swan Yard, Eastern Avenue, Andover, Hampshire	No
Former Brewery Site, The Horsefair, Romsey, Hampshire	No
Anton Laundry, Marlborough Street, Andover, Hampshire	No
Nightingale Lodge, Greatwell Drive, Romsey, Hampshire	No
Land at Eastwood Court, Romsey, Hampshire	No
Former Andover Pumping Station, River Way, Andover, Hampshire	No
Garages at Bilbao Court, Vigo Road, Andover, Hampshire	No
Pure 8 Tyre Tech Limited, Ashfield Sawmill, Southampton Road, Ashfield, Romsey, Hampshire	No
Land Adjacent Home Farm, Embley Lane, East Wellow, Romsey, Hampshire	No
Home Farm, Embley Lane, East Wellow, Hampshire	No

Table 1: Identifying sites within Test Valley Brownfield Register

6.2.7 As the site is also within 5km of Southampton City Council's administrative area it has also been necessary to review the Southampton City Council Brownfield Land Register. Table 2 below identifies the sites within 5km of the substation and identified on the register.

<u>Site</u>	<u>Within 5KM</u>
BLR E 50 – Townhill Park	Yes



Table 2: Identifying sites within Southampton City Council Brownfield Register

6.2.8 The above tables identify that there are no sites within Test Valley within 5km of the site and 1 site within Southampton that is on the Brownfield Register. As a result it is necessary to review the suitability, viability and availability of site BLR E 50 – Townhill Park.

<u>Site</u>	<u>Suitability</u>	<u>Viability</u>	<u>Availability</u>
BLR E 50 Townhill Park	This site is not suitable for the proposed use as: It is located within 200m of residential uses which is a sensitive use. The site would need to cross significant infrastructure including motorways and railway lines; The site has planning permission for 65 residential dwellings.	The benchmark land value for a residential development would be £20m, whereas a lease for this site is circa £100k per annum. As a result this development would not be viable. The site is provided on a lease and not a sale. As such the yield would not be competitive with a residential land use.	Given the site has planning permission for residential development it is not available for this land use.

Table 3: Reviews the suitability, viability and availability of a site on the BLR.

6.2.9 Table 3 above assesses the suitability, viability and availability of the site at Townhill Park. This clearly identifies the reasons why this site is not suitable for use as battery storage and further details why the proposal would not be viable for this proposed land use.

6.2.10 It can therefore be concluded that there are no brownfield sites within 5km of the site which are suitable, viable or available for battery storage.

6.3 Site Selection Summary

6.3.1 This site was selected as it satisfied all of the above selection criteria within a viable proximity the a point of connection on the local electricity network with capacity to accommodate the scheme.

6.3.2 The site is available for development and in unconstrained by any statutory designation which might preclude its development.

6.3.3 It is well-screened and sensitively located, such that it does not appear prominently within the landscape



and benefits from natural existing natural screening. Its location means that its development would not impact upon the setting of designated heritage assets nor significant ecological features within the area.

- 6.3.4 There were no alternative, suitable brownfield sites identified within the area following a review of prospective sites within 5km from the Substation.
- 6.3.5 The site is therefore highly suitable for development and offers a good opportunity to deliver a viable energy storage system whilst also delivering key environmental enhancements to further enhance the sustainability credentials of the proposals.



7.0 Pre-application Engagement

7.1 EIA Screening

- 7.1.1 This development was submitted to Test Valley Borough Council for a Screening Opinion under the Environmental Impact Assessment (EIA) Regulations 2017 under reference 22/02954/SCRS on the 11th November 2022. Test Valley Borough Council responded to the request on 7th December and confirmed that the proposed development does not require EIA. This process confirms that the development is not considered likely to give rise to significant environmental effects.

7.2 Briefing Parish Council and Local Ward Members

- 7.2.1 On the 11th November 2022 a formal briefing note was sent to Chilworth Parish Council. The note sought to provide an introduction to the proposed planning application and the type of development being proposed at the site.
- 7.2.2 The briefing note was also shared with all elected ward members for both the Chilworth, Nursling & Rownhams Ward and the adjacent North Baddesley ward.
- 7.2.3 When sending the briefing note, an invitation was extended to undertake further engagement following feedback with these stakeholders, including the offer of a meeting to discuss any queries which they might have ahead of the submission.
- 7.2.4 A meeting with the local Parish Council is scheduled for the 5th January 2023 to coincide with a pre-arranged monthly meeting and it is understood that local ward members have also been invited. The meeting will provide further opportunity for engagement.



8.0 Planning Policy Context

8.1 Administrative Context

8.1.1 The site predominantly lies within the administrative area of Test Valley Borough Council. However the cable route which extends to the Velmore Substation crosses the administrative boundary into Eastleigh Borough Council as shown below at Figure 10.

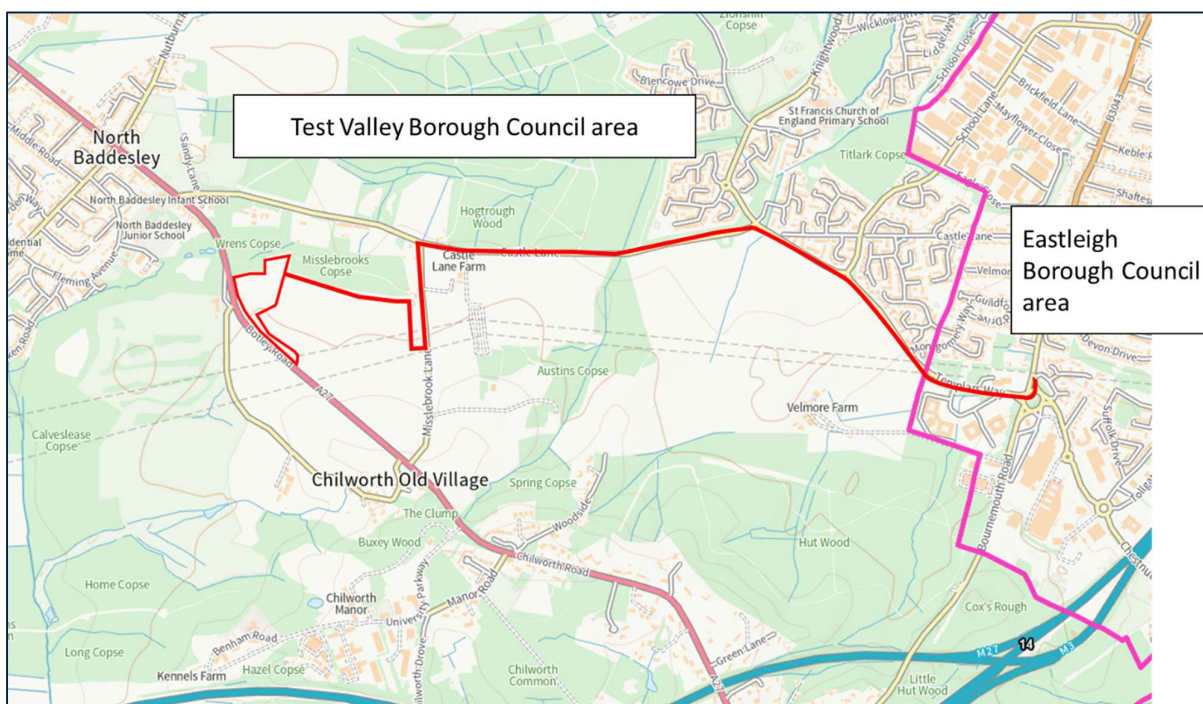


Figure 10 Site location plan in relation to local Council boundaries

8.1.2 The main site lies within Chilworth Civil Parish but is very nearby to the Civil Parish of North Baddesley and the settlement itself. The Cable route runs adjacent to Valley Park CP and connects to the substation in Chandler's Ford CP as illustrated on the plan below at Figure 11.

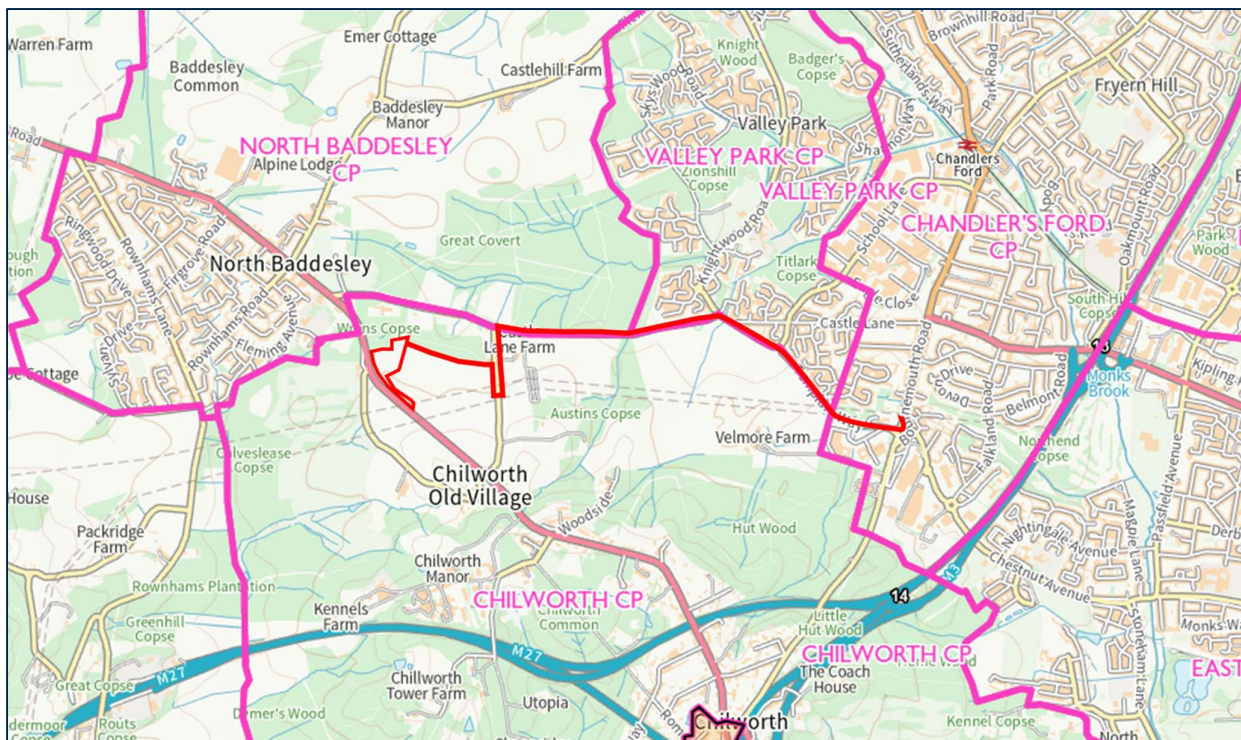


Figure 11 Site location in relation to nearby Parish Boundaries

8.2 Legislative Context

8.2.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 specifies that the determination of an application should be in line with the Development Plan unless material considerations indicate otherwise. The purpose of the Planning Statement is to demonstrate that the Proposed Development is acceptable when assessed against the provisions of the Development Plan and all material considerations relative to the nature and merits of the proposed development.

8.3 The Development Plan

8.3.1 The Main Site area falls within the administrative area of Test Valley Borough Council. The current Development Plan for the area comprises the following DPDs of relevance for the Proposed Development:

- The Test Valley Borough Revised Local Plan DPD 2011 to 2029 (adopted 2016)

8.3.2 The cable route crosses into Eastleigh Borough Council towards the point of connection at the Velmore



Substation. The pertinent Development Plan in the Eastleigh area is the Eastleigh Borough Local Plan (2016-2036) Adopted April 2022.

8.3.3 Noting the relatively minor works which are proposed within the Eastleigh area, this Planning Statement will focus upon the Development Plan Policies contained within the Test Valley Borough Revised Local Plan and is anticipated that they would take responsibility for administering the determination of the planning application.

8.3.4 There is currently no neighbourhood plan of relevance to the application.

8.4 The Test Valley Local Plan 2011 - 2029

8.4.1 The Test Valley Local Plan was adopted in 2016 and comprises a long-term spatial vision and strategic objectives for the area for the period 2011 to 2029.

8.4.2 Figure 12 below shows the site in relation to the proposals map from Inset Plan 3 and confirms the main area based policies in relation to the proposals (COM2- Open Countryside and E3 Local Gaps).

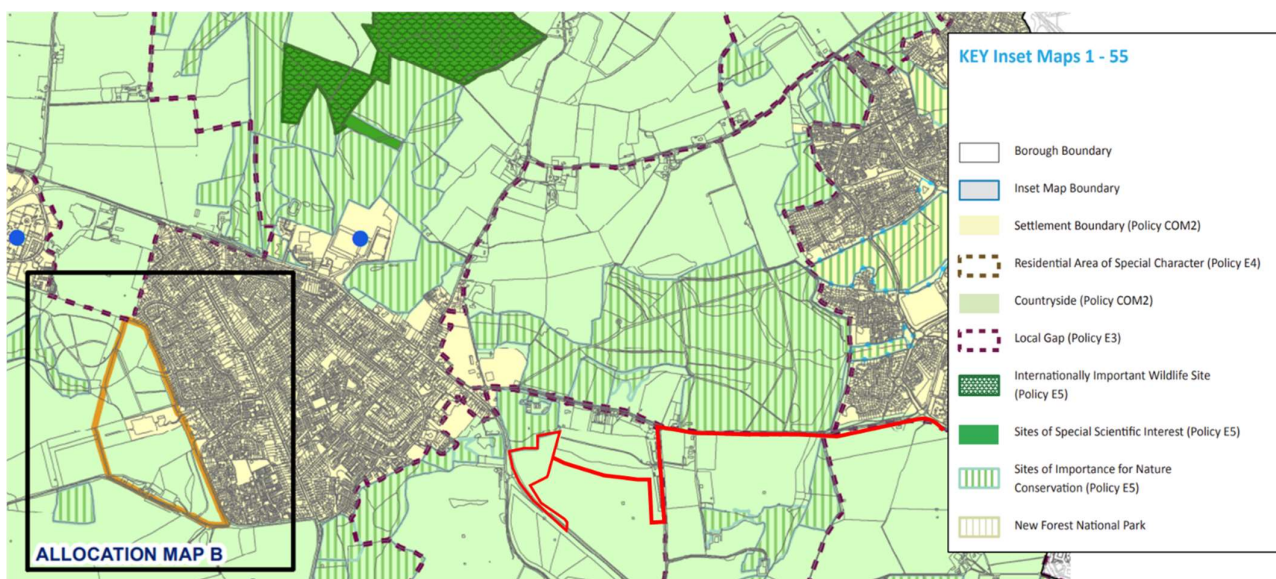


Figure 12 Extract from the Inset Plan 3 of the Local Plan Proposals Map

8.4.3 Having reviewed the area-based policies and the wider Development Plan, the planning policies and spatial objectives that are relevant for the purposes of the Proposed Development are summarised below:



8.4.4 Policy SD1 – Presumption in Favour of Sustainable Development – Seeks to support sustainable development and commits the Council to grant permission unless material considerations indicate otherwise.

8.4.5 Policy COM2: Settlement Hierarchy; The site sits outside of any identified settlement boundary and as such Part b) ‘Open Countryside’ of the Policy is of relevance. This explains that development will only be permitted here if it is essential for the proposal to be located in the Open Countryside.

8.4.6 Policy COM15 – Infrastructure; This states that:

“Development will be permitted provided that the appropriate investment has been secured either in the form of works and/or financial contributions to mitigate the impact on existing infrastructure.”

8.4.7 Policy E2: Protect, Conserve and Enhance the Landscape Character of the Borough. This states that:

To ensure the protection, conservation and enhancement of the landscape of the Borough development will be permitted provided that:

- a) it does not have a detrimental impact on the appearance of the immediate area and the landscape character of the area within which it is located;*
- b) it is designed and located to ensure that the health and future retention of important landscape features is not likely to be prejudiced;*
- c) the existing and proposed landscaping and landscape features enable it to positively integrate into the landscape character of the area;*
- d) arrangements for the long term management and maintenance of any existing and proposed landscaping have been made; and*
- e) it conserves the landscape and scenic beauty of the New Forest National Park or the North Wessex Downs Area of Outstanding Natural Beauty where applicable; and*
- f) does not result in the loss of important local features such as trees, walls, hedges or water courses.*



8.4.8 Policy E3: Local Gaps which states that:

Development within Local Gaps will be permitted provided that:

a) it would not diminish the physical separation and/or visual separation; and

b) it would not individually or cumulatively with other existing or proposed development compromise the integrity of the gap.

8.4.9 Policy E5: Biodiversity;

“Development in the Borough that will conserve, and where possible restore and / or enhance, biodiversity will be permitted.”

8.4.10 Policy E7: Water Management; Requires adherence to national policy in terms of flood risk.

8.4.11 Policy E8: Pollution;

Development will be permitted provided that it does not result in pollution which would cause unacceptable risks to human health, the natural environment or general amenity

8.5 Emerging Draft Local Plan 2040

8.5.1 The Regulation 18 Draft Local Plan has been published on 1st February 2022; this confirms that:

8.5.2 Climate change is one of the greatest challenges, with the Governments statutory target for the country to achieve net zero carbon emissions by 2050. The Regulation 18 plan identifies the importance of Local Plans playing a fundamental role in addressing the climate change challenge.

8.5.3 The Local Plan 2040 seeks to reduce CO2 emissions through minimising the impacts of development and through adaptation to manage the impacts. It is a fundamental objective embedded in the Local Plan 2040 and a priority for local communities.

8.6 National Planning Policy Framework

8.6.1 The National Planning Policy Framework (NPPF) is a material consideration in planning decisions. At the heart of the NPPF is a presumption in favour of sustainable development. This means approving development proposals that accord with the Development Plan without delay (Paragraph 11).



8.6.2 The NPPF was revised on 20 July 2021 and sets out the Government's planning policies for England and how these are expected to be applied.

8.6.3 Section 6: Building a strong, competitive economy

Paragraph 84 states that; *in supporting a prosperous rural economy, planning decisions should enable the development and diversification of agricultural and other land-based rural businesses.*

8.6.4 Section 9: Promoting sustainable transport

Paragraph 110 requires that *'safe and suitable access to the site can be achieved for all users and states that it should be ensured that any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be effectively mitigated to an acceptable degree'.*

Paragraph 111 instructs that *'development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe'.*

8.6.5 Section 11: Making effective use of land

Paragraph 120(a) states that *'planning policies and decisions should 'encourage multiple benefits from both urban and rural land, including through [...] taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation [...].'*

8.6.6 Section 14: Meeting the challenge of climate change, flooding and coastal change

Paragraph 152 identifies that *'the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It states that it should 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.'*

Paragraph 158 outlines that, *'When determining planning applications for renewable and low carbon development, local planning authorities should:*

a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and



recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions; and

b) approve the application if its impacts are (or can be made) acceptable. Once suitable areas for renewable and low carbon energy have been identified in plans, local planning authorities should expect subsequent applications for commercial scale projects outside these areas to demonstrate that the proposed location meets the criteria used in identifying suitable areas.'

8.6.7 Section 15: Conserving and enhancing the natural environment

Paragraph 180 requires that local planning authorities '*should encourage opportunities to incorporate biodiversity improvements especially where this can secure measurable gains for biodiversity*'.

8.6.8 Section 16: Conserving and enhancing the historic environment

Paragraph 194 states that in determining applications, '*local planning authorities should require the applicant to describe the significance of any heritage assets affected, including the contribution made by their setting*'.

8.7 National Planning Practice Guidance (NPPG)

8.7.1 The NPPG includes specific guidance pertaining to renewable energy under the following sub-headings:

'Why is planning for renewable and low carbon energy important?'

8.7.2 *"Increasing the amount of energy from renewable and low carbon technologies will help to make sure the UK has a secure energy supply, reduce greenhouse gas emissions to slow down climate change and stimulate investment in new jobs and businesses. 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."*

Paragraph: 001 Reference ID: 5-001-20140306 Revision date: 06 03 2014

What technical considerations relating to renewable energy technologies affect their siting?



- 8.7.3 *“Examples of the considerations for particular renewable energy technologies that can affect their siting include proximity of grid connection infrastructure and site size.”*

Paragraph: 006 Reference ID: 5-006-20140306 Revision date: 06 03 2014

8.8 National Policy Statements

- 8.8.1 The principle of low carbon development is well supported by National Policy Statements published in accordance with the Planning Act 2008 (PA 2008). There have been a number of appeal decisions which confirms and reinforces the relevance of these statements to applications considered under the Town and Country Planning Act (1990).
- 8.8.2 Recent Appeal decision APP/J3720/W/22/3292579 relating to a solar farm in Stratford on Avon identified that National Policy Statements can be equally applied to applications under the Town and Country Planning Act (1990) regime.
- 8.8.3 Furthermore Paragraph 5 of the NPPF 2021 states that ‘National policy statements form part of the overall framework of national planning policy, and are a **material consideration** in decisions on planning applications.’
- 8.8.4 As such the Overarching National Policy Statement for Energy (EN-1) is a material consideration which must be taken into account in the determination of this planning application.
- 8.8.5 Paragraph 2.2.20 of EN-1 states; *“It is critical that the UK continues to have secure and reliable supplies of electricity as we make the transition to a low carbon economy. To manage the risks to achieving security of supply we need sufficient electricity capacity (including a greater proportion of low carbon generation) to meet demand at all times. Electricity cannot be stored so demand for it must be simultaneously and continuously met by its supply. This requires a safety margin of spare capacity to accommodate unforeseen fluctuations in supply or demand.”*
- 8.8.6 Paragraph 3.3.29 of EN-1 supports the development of decentralised electricity generation facilities: *“The Government would like to see decentralised and community energy systems such as microgeneration make a much greater contribution to our targets on reducing carbon emissions and increasing energy security from current levels of these systems. These technologies could lead to some reduction in demand on the main generation and transmission system.”*



- 8.8.7 EN-1 recognises that a flexible approach to energy generation is required to provide backup supply for intermittent renewable energy. Paragraph 3.3.11 states; *“...the more renewable generating capacity we have the more generation capacity we will require overall, to provide back-up at times when the availability of intermittent renewable sources is low. If fossil fuel plant remains the most cost-effective means of providing such back-up, particularly at short notice, it is possible that even when the UK’s electricity supply is almost entirely decarbonised we may still need fossil fuel power stations for short periods when renewable output is too low to meet demand, for example when there is little wind.”*
- 8.8.8 Paragraph 3.6.1 continues to state that; *‘Fossil fuel power stations play a vital role in providing reliable electricity supplies: they can be operated flexibly in response to changes in supply and demand, and provide diversity in our energy mix. They will continue to play an important role in our energy mix as the UK makes the transition to a low carbon economy, and Government policy is that they must be constructed, and operated, in line with increasingly demanding climate change goals.’*
- 8.8.9 EN-1 recognises that the increasing reliance on renewable energy sources with Paragraph 3.3.12 stating that *“we need more total electricity capacity than we have now, with a larger proportion being built only or mainly to perform back-up functions.”*

9.0 Other Material Considerations

9.1 Political Plans and Strategy

- 9.1.1 In addition to formal policy laid out within the statutory Development Plan and National Level planning policy documents, the following documents are also material considerations to be weighed in the assessment of the planning application.

The Energy White Paper – Powering our Net Zero Future, HM Government, December 2020

- 9.1.2 Under the strategy, ‘Energy Storage and Flexibility’ are listed as a priority area for net zero innovation
- 9.1.3 The strategy acknowledges the challenge faced by a transition to renewable energy supply and states that:

“Electricity markets need to adapt as the deployment of renewable generation increases. Balancing



supply and demand becomes more complex because most renewables are, by their nature, intermittent and generate electricity only when the wind blows or the sun shines.”

9.1.4 It also recognises the opportunity which energy storage presents, explaining that:

“Increasingly, flexibility will come from new, cleaner sources, such as energy storage in batteries, increased interconnected capacity from neighbouring electricity markets, or from consumers using smart technologies to reduce how much energy they use or shift when they use the energy to different times in the day. New forms of flexibility could lower future costs for consumers, by minimising expensive network reinforcement or reducing the need for additional generation, especially peaking capacity which needs to be deployed quickly to meet spikes in demand.”

The United Nations Paris Agreement on Climate Change 2015

9.1.5 The Paris Agreement is a legally binding international treaty on climate change adopted by 196 Parties at COP 21 in Paris, on 12 December 2015 and entered into force on 4 November 2016. Its goal is to limit global warming to well below 2, preferably to 1.5 degrees Celsius, compared to pre-industrial levels

9.1.6 The Agreement represents a landmark in the international climate change process because, for the first time, a binding agreement brings all nations into a common cause to combat climate change and adapt to its effects.

Transitioning to a net zero energy system: smart systems and flexibility plan 2021- Department for Business, Energy and Industrial Strategy and Ofgem

9.1.7 The DBEIS plan sets out how the UK we will facilitate the transition to a smarter and more flexible energy system. It explains that:

“The government is committed to leading the way in the transformation of our energy system. A smarter, more flexible system will utilise technologies such as energy storage and flexible demand to integrate high volumes of low carbon power, heat and transport and reach a carbon neutral future”.

9.2 Test Valley Borough Council Climate Emergency Action Plan

9.2.1 In 2019 Test Valley Borough Council (TV) declared a Climate Emergency recognising the immediate



challenges to help sustain and improve the quality of life of those in Borough both now and into the future.

9.2.2 In June 2020 Test Valley Council approved its Climate Emergency Action Plan. This Action Plan sets out how the actions of the Council can contribute to help reduce the level of emissions it creates and minimise the impact of climate change on the local community.

9.2.3 The Climate Emergency Action Plan sets out the following Actions which this development will help support:

9.2.4 Review energy purchasing and procurement – To help the move towards renewable and low carbon energy sources, thus reducing emissions.

9.3 Summary

9.3.1 The provision of low carbon energy is central to the economic, social and environmental dimensions of sustainable development set out in the Framework. There is strong national policy support, from the Government's Energy White Paper (EWP) and National Policy Statement EN-1 2 (NPS), for the development of battery storage, which would aid in the storage of energy generated from renewable sources which by their nature, intermittently generate energy. Additionally, the NPS advises that storage is needed to reduce the costs of electricity and increase its reliability.



10.0 Planning Assessment

10.1 Principle of development

Legal and Political Framework

- 10.1.1 The United Kingdom is committed to legally binding targets to reduce its emissions under the Paris Agreement 2015 to by 2030 achieve at least a 40% reduction in CO₂e emissions below 1990 levels. This is a challenging target but seen as vital in order to deliver on the Paris Agreements aims of holding the increase in global average temperature rises to well below 2 degrees Celsius above pre industrial levels and pursue efforts to limit warming to 1.5 degrees Celsius.
- 10.1.2 At a national level the UK Government have published a series of reports and policy requirements to respond and help the UK move towards a net zero carbon economy. The Energy White Paper 2020: Powering our Net Zero Future, this key document which will inform policy development identifies the changing nature of energy and how the national grid is changing and adapting. The White Paper recognises the benefits of low-cost, net zero energy which is composed predominantly of wind and solar. The White Paper identifies the importance of ensuring the system is reliable and that intermittent renewables need to be completed by technologies which provide power, or reduce demand, when the wind is not blowing, or the sun does not shine.
- 10.1.3 Battery technology as proposed in this application will play a vital part in ensuring resilience of the power distribution network. They are in the vanguard of new technologies that are required to balance the grid and help sustain the efficiencies and deployment of renewable energy systems.
- 10.1.4 The amount of power generated by renewable sources fluctuates through seasons, if energy that is generated cannot be used it is discarded or curtailed. Research has shown that between 2015 and 2021, in the UK, 13% of the total wind energy generated was curtailed. This is a growing issue and in 2020/21 enough energy to power 800k homes was curtailed. The use of battery storage is designed to store excess energy that is generated and realise this when there is demand.
- 10.1.5 The Transitioning to a net zero energy system: smart systems and flexibility plan 2021 Policy Paper emphasises the importance of smart and flexible energy systems in balancing the energy grid. Battery storage technologies are a vital part in achieving a net zero energy system with these technologies



contributing at the integration of renewable generation by acting as a source of demand to alleviate generation constraints.

National Planning Policy

- 10.1.6 The National Planning Policy Framework (NPPF) is central to delivering sustainable development and therefore a presumption in support of this development through Paragraph 11 of the Framework.
- 10.1.7 Furthermore, through Paragraph 155 of the NPPF, LPAs are required to help increase the use and supply of renewable and low carbon energy, that seeks to maximise the potential for suitable development, while ensuring that the adverse impacts are addressed satisfactorily.
- 10.1.8 The proposals for energy storage represent a low carbon form of development. Paragraph 158 of the NPPF does not require applicants to demonstrate an overall need for renewable or low carbon energy, and recognises that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions. This development is required to help balance the energy inputs and outputs and helps deliver an energy efficient national grid to help sustain power.
- 10.1.9 National Planning Policy is clear that there is strong support from the Government's White Paper and National Policy Statement EN1 for the development of battery storage which would aid the storage of energy generated from renewable sources.
- 10.1.10 The National Planning Policy Guidance makes clear that the siting of renewable energy project will be driven by a variety of considerations including connection to the grid and site size.
- 10.1.11 In this instance the location has been selected on the basis of a thorough site-selection process, principally derived from the availability of a grid connection at the Velmore Substation. A review of available prospective brownfield sites has also been undertaken and the location of the site has been selected with careful reference to the full siting criteria set out at Chapter 6.0 of this statement.
- 10.1.12 Overall this development is an important piece of low carbon infrastructure which will help sustain the local grid infrastructure and facilitate the transition to a low carbon grid. It also represents a agricultural diversification which is supported by Paragraph 84 of the NPPF.
- 10.1.13 As such this development is in full accordance with the aims of National Policy.



The Development Plan

- 10.1.14 From reviewing both national and local policy, including the Test Valley Borough Council Climate Emergency, there is widespread support for low carbon development such as this that is required to deliver on climate change objectives and facilitate the use of renewable energy generation and the transition to net zero emission.
- 10.1.15 Policy SD1: Presumption in Favour of Sustainable Development outlines that where development accords with the Revised Local Plan it will be approved without delay unless material considerations indicate otherwise.
- 10.1.16 Policy COM2: Settlement Hierarchy identifies that this site is outside of a settlement and as such part b) of policy COM2 applies which relates to proposals for development in the open countryside. This confirms that development will only be permitted in this context if:
- B) It is essential for the proposal to be located in the countryside.
- 10.1.17 Chapter 6.0 of this statement explains the thorough and robust process of site selection which has underpinned the need for an open countryside location. This serves to justify the need for an open countryside location in this instance. In particular it is noted that:
- There are no viable alternative brownfield sites which are available within a viable proximity of the Point of Connection
 - The development cannot be located in close proximity to residential development noting the likelihood of amenity impacts
 - The site satisfies the full range of technical criteria, making it suitable to accommodate the development
- 10.1.18 In light of the above and the robust site selection process which has been explained, the open countryside location of the site can be wholly justified in this instance.
- 10.1.19 The site lies within a defined Local Gap, through Policy E3 of the Local Plan. The policy permits development in such areas, providing that it would not diminish the physical separation and/or visual



separation; and it would not individually or cumulatively with other existing or proposed development compromise the integrity of the gap.

10.1.20 In this instance, this development has been well-planned such that it would not diminish the physical separation or visual separation of nearby settlements as it represents a relatively small piece of essential infrastructure which has been sensitively sited and designed to minimise visual impacts.

10.1.21 The site location does not sit immediately alongside nor adjoin any existing development. Furthermore as detailed on the landscaping scheme the development will be well screened and will integrate well into the local landscape. Accordingly, the proposals satisfy the requirements of Policy E3 and the principle of development can be supported in this context.

Conclusions on the principle of development

10.1.22 This statement has explained why the site has been selected with reference to the detailed site selection process, and has explained that there are no alternative brownfield sites which are suitable, viable and available. Accordingly, it is demonstrated that a countryside location is required and that the proposals are therefore compliant with Policy COM2.

10.1.23 As well as being able to justify a countryside location, the development does not diminish physical or visual separation that either individually or cumulatively compromises the integrity of the identified 'Local Gap' designation. As a result the development is compliant with Policy E3 of the Local Plan.

10.1.24 This development represents a significant investment in local infrastructure which is wholly funded by the private sector and it would be managed and maintained by the applicant for the 40 year operation timeframe proposed. The proposals therefore comply with Policy COM15 which permits infrastructure development providing *"that the appropriate investment has been secured either in the form of works and/or financial contributions to mitigate the impact on existing infrastructure."*

10.1.25 The numerous benefits of the scheme, including the achievement of a Biodiversity Net Gain (BNG) also contribute towards demonstrating how the proposals represent sustainable development in economic, social and environmental terms. Sustainable development and is strongly supported by the NPPF and NPPG and is in accordance with the Test Valley Borough Council Climate Emergency Action Plan.



- 10.1.26 As such this development helps support and deliver sustainable development and is in full accordance with the development plan in this regard.

10.2 Site Access

- 10.2.1 Access to the site will be provided via a splayed access to the south of the battery storage compound through both the construction and operational phases of the project. The access provides safe and convenient access to the site as assessed through the accompanying Construction Traffic Management Plan (CTMP).
- 10.2.2 Once operational, the access is required for routine maintenance of the site and would be used very infrequently, comparable to the current agricultural use.
- 10.2.3 The proposed access will not have an adverse impact on the function, safety, and character of the strategic highway network or any public rights of way.
- 10.2.4 The proposed development is therefore compliant with Policy T1: Managing Movement of the Local Plan.

10.3 Landscape and Visual Impact

- 10.3.1 Careful consideration has been given to the siting of this development to minimise the impact on the landscape. The site is not within a designated landscape, it is not nearby to any Public Right of Way and it is not visible from any prominent vantage point.
- 10.3.2 Within the wider field in which the site is located, the compound has been sited to the south of a copse of trees which provides a block of structural landscaping within the area. The siting of the development in close proximity to the trees allows for the impact of the development on the local landscape to be softened as it will appear within context of the trees and not appear as an isolated or separated piece of development.
- 10.3.3 The development has been submitted with a extensively designed and considered landscaping scheme. This not only supplements the existing screening along the Botley Road which forms the southern boundary of the site but also provides a effective buffer around the site with new native planting and trees.



- 10.3.4 The impact of development is also fairly limited by virtue of the scale and massing of the development and its efficient use of space. The development will sit within neat rows of small buildings at a consistent height and surrounded by a landscaping scheme. This is detailed on the Landscape Master Plan which supports this application and provides a detailed specification for the planting together with a maintenance schedule.
- 10.3.5 This is a well-designed and considered proposal which respects and protects the environment. The development is of good quality and will help reinforce the local distinctiveness of the site. The development is well integrated into the surrounding area. As a result the development will comply with Policy E1: High Quality Development in the Borough.
- 10.3.6 Furthermore, the development seeks to retain existing landscape features and also provide and maintain new landscaping. The development would comply with the full criteria set out Policy E2: Protect, Conserve and Enhance the Landscape Character of the Borough. These criteria are set out below alongside an explanation of how the proposals satisfy each point:

To ensure the protection, conservation and enhancement of the landscape of the Borough development will be permitted provided that:

- *it does not have a detrimental impact on the appearance of the immediate area and the landscape character of the area within which it is located;*
 - o **The area has a semi-rural character, with the open field being in contrast to the large vertical infrastructure presented by the overhead power lines which cross the site**
 - o **The careful siting of the battery compound and the proposed landscaping would ensure that the appearance and landscape character of the site would be maintained and would be enhanced through the strengthening of key features including the hedgerow bank along Botley Road**
- *it is designed and located to ensure that the health and future retention of important landscape features is not likely to be prejudiced;*



- **The proposed landscaping would be maintained for the full 40 year operational timeframe of the development, leaving a legacy of biodiversity enhancements following decommissioning**
- *the existing and proposed landscaping and landscape features enable it to positively integrate into the landscape character of the area;*
 - **The block of woodland to the north and the hedgerow bank along Botley Road would serve to screen the proposed development and these features would be further reinforced through the additional landscaping measures which are proposed**
- *arrangements for the long term management and maintenance of any existing and proposed landscaping have been made; and*
 - **The applicant intends to own, operate and maintain the development for the full operational timeframe of the development and it is envisaged that a planning condition would be imposed to ensure adherence to a final, approved landscape management plan**
- *it conserves the landscape and scenic beauty of the New Forest National Park or the North Wessex Downs Area of Outstanding Natural Beauty where applicable; and*
 - **The site is sufficiently distanced from these areas so as to ensure that they would be fully protected and conserved. This is supported by the EIA Screening decision which concluded that there would be no likelihood of significant effects on these landscapes**
- *does not result in the loss of important local features such as trees, walls, hedges or water courses.*
 - **The development has been planned to avoid all root protection areas, walls, hedgerows and watercourses and these existing features would therefore be fully retained**



10.4 Flood Risk and Drainage

10.4.1 The site lies wholly within Flood Zone 1, which has the lowest probability of flooding.

10.4.2 The development has been designed with integrated site drainage so to ensure that the development will not result in any off site impacts on surface water flooding. This has been achieved through ensuring that the development is permeable and accommodate the anticipated rates of flow.

10.4.3 Indeed, through the submitted Flood Risk Assessment (FRA) it is assumed that the site itself is 100% permeable and it is noted that:

“The proposed development will result in an overall hardstanding area of approximately 0.09 ha associated with the introduction of the battery storage containers. The proposed access track and internal service road will be surfaced with a permeable surface and will therefore continue to drain as per the existing situation.”

10.4.4 In light of the above it is subsequently explained that:

“The increase in hardstanding area associated with the battery storage containers will result in a negligible increase in surface water runoff. Notwithstanding, the battery storage containers will be raised above a permeable gravel sub-base which will seek to mimic the existing drainage regime by retaining water close to source stopping lateral flow, allowing it to infiltrate as existing and without increasing off-Site flood risk.”

10.4.5 The proposals are therefore compliant with Policy E7: Water Management

10.5 Noise Impact Assessment

10.5.1 This application is supported by a Noise Impact Assessment (NIA) prepared by specialist consultants, ITP Energised. This details how the noise impacts of the development have been assessed against the observed baseline levels, which are ascertained through a period of on-site monitoring.

10.5.2 The background noise of the nearby M27 Motorway was observed through the monitoring of the baseline noise levels and in the first instance, care was taken to distance the proposed site from nearby residential receptors.



- 10.5.3 The NIA details that the resultant noise impact of the facility at the nearest noise sensitive receptors (NSRS) has therefore been assessed as low/very low during the daytime and low during the night-time. during the daytime period and the night-time period. Operation of the proposed BESS therefore meets the Lowest Observed Adverse Effect Level (LOAEL).
- 10.5.4 Consequently, this development will not result in unacceptable adverse impacts including the loss of residential amenity. As a result the development will comply with Policy E8 of the Local Plan.

10.6 Heritage Assessment

- 10.6.1 The application has been supported by a Heritage Impact Assessment and this considers the impact of the development on the historic environment. The HIA concludes:

“Owing to the considerable dense vegetation in Chilworth and along the route of Botley Road, and the low rise nature of the proposal, it is assessed that the battery storage site will be almost imperceptible from Chilworth, which is by far the closest settlement to the proposed battery storage site. Therefore, No Impacts to the significance of the Chilworth Conservation Area are envisaged”.

“For the proposed cable route, this will be entirely buried beneath the existing roads, and will likewise have No Impact on the significance of the Chilworth Conservation Area”.

- 10.6.2 As a result the development will not have an impact on the historic environment.

10.7 Tree Survey and Protection Strategy

- 10.7.1 A full tree survey was completed which has informed the planning of the site layout so as to avoid all identified root protection areas. This application is also submitted with a Arboricultural Report.
- 10.7.2 All existing trees are retained, and new tree and hedgerow planting is proposed in a manner which would complement the existing landscaping.
- 10.7.3 The report has also provided details of tree protection details to demonstrate how these trees would be protected during the construction phase.
- 10.7.4 The Arboricultural Report demonstrates that the proposed development will not result in the loss of important local features and is in accordance with Policy E2 of the Local Plan.



10.8 Sustainable Development

- 10.8.1 The Benefits Statement at Chapter 5.2 explains how the proposals represent sustainable development in social, economic and environmental terms in accordance with Paragraph 8 of the NPPF.
- 10.8.2 Overall, the proposed development is important low carbon infrastructure which will help address the issues identified by the Climate Emergency and will help facilitate the use of renewable energy and the grid. It would help to suppress future energy price rises and would support the businesses and services which support all aspects of society.
- 10.8.3 The development delivers a well designed development that achieves a net gain in bio-diversity and would be delivered without any government subsidy.



11.0 Conclusions

11.1 Summary

- 11.1.1 The full planning application proposes a battery electrical storage system (BESS), together with substation, transformer stations, site accesses, internal access tracks, security measures, access gates, other ancillary infrastructure and landscaping and biodiversity enhancements.
- 11.1.2 The proposals would optimise the use of our available renewable energy resource and would help to address the causes of climate change and support the transition to low carbon energy. They therefore represent a form of low carbon development in both practical terms and for planning purposes.
- 11.1.3 The site is well screened and together with an extensive landscaping plan that delivers species rich native planting will deliver a measurable net gain in bio-diversity. The development is also sensitive to its surroundings and will have a limited local impact on the character and appearance of the area.
- 11.1.4 A countryside location is necessary to accommodate the development and it is demonstrated that no suitable, viable or available brownfield sites could accommodate the scheme.
- 11.1.5 The principle of development is supported by the policies and guidance contained within the Development Plan and the NPPF.
- 11.1.6 It has been demonstrated through a technical evidence base of assessments that no harm will occur to designated heritage assets, the surrounding landscape, trees, ecology, residential amenity. Similarly, there will be no increase risk of flooding as a result of the proposals.
- 11.1.7 The proposals have been assessed against the most relevant policies contained within the Development Plan and the relevant sections of the NPPF. It is demonstrated that the proposals would comply with the key policy tests and would represent sustainable development as described in National Policy. The benefits of the development are significant and should carry substantial weight.
- 11.1.8 Accordingly, the Local Planning Authority is kindly requested to approve the planning application without delay.



