TWO SMALL SCALE STANDBY ELECTRICITY GENERATORS – DECOY FARM

Planning, Design and Access Statement

Abstract

Supporting information relating to the planning application for two small scale standby electricity generator at Decoy Farm, north-east of Crowland.

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1 Site Information

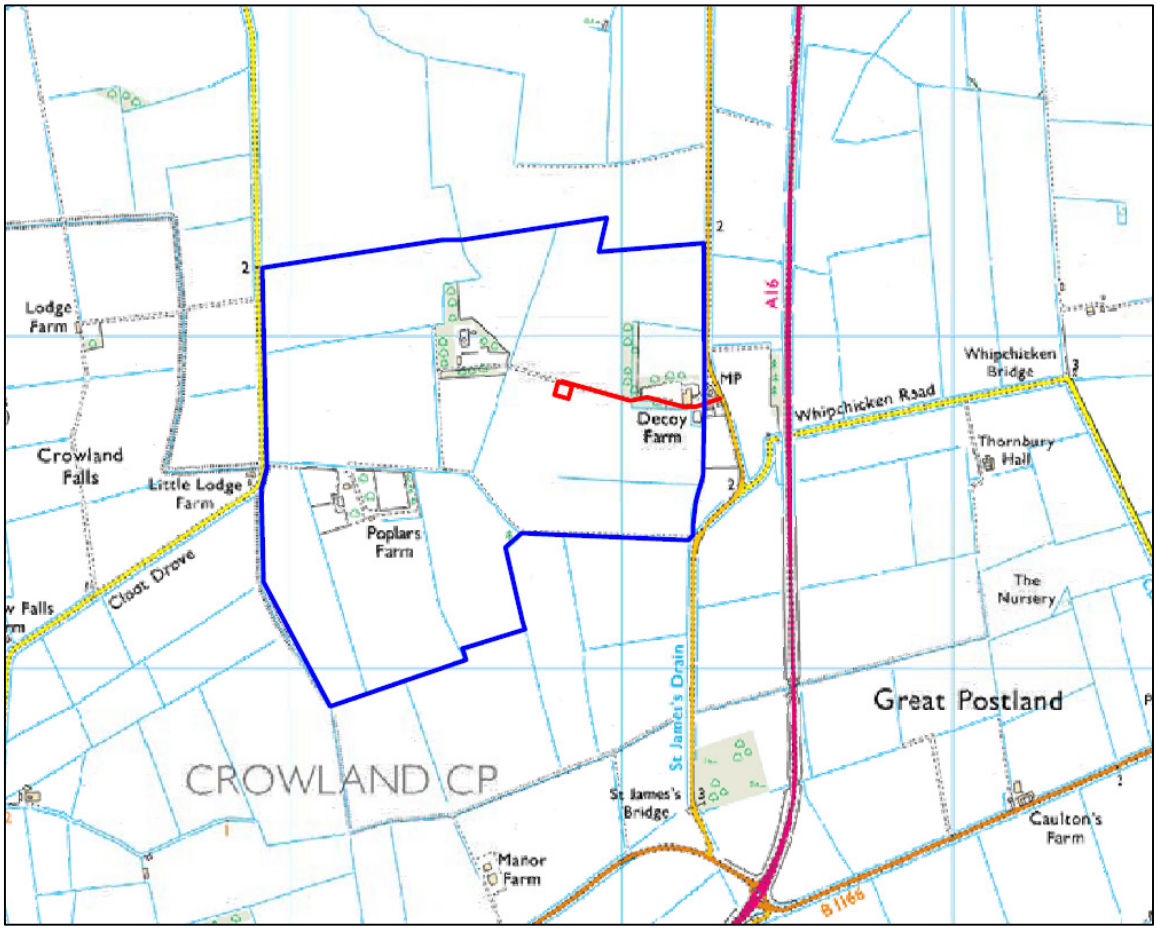
1.1 Background and Description of the Application

This supporting planning statement accompanies a planning application by Edge Power Ltd to South Holland District Council for full planning permission to develop two small scale standby electricity generators, within the farm complex at Decoy Farm, Peterborough.

The two proposals comprise (please refer to accompanying plans for dimensions and further information):

- 1 x 11MW small scale standby electricity generator, comprising 5 x gas generators
- 1 x 20MW small scale standby electricity generator, comprising 10 x gas generators
- 2 x Gas Kiosks
- 2 x Transformers
- 2 x Oil Storage Tanks

Figure 1.1 – Site Location (Scale 1:25k)



1.2 The Site

The application site, Decoy Farm, known through this document as “the site” is located to the north east of Crowland and south of Spalding. The site is approximately 730m (in a straight line) west of the A16, with the standby electricity generators situated within an agricultural field that incorporates a solar farm and anaerobic digester units.

The proposed generator building will be within the northern portion of the agricultural field, surrounded by varying diversifications including a solar farm and anaerobic digester. The two standby electricity generators will be located next to each and therefore viewed as a single scheme. However due to the current financial support mechanisms in place to allow for the effective deployment of the schemes two planning applications have been submitted:

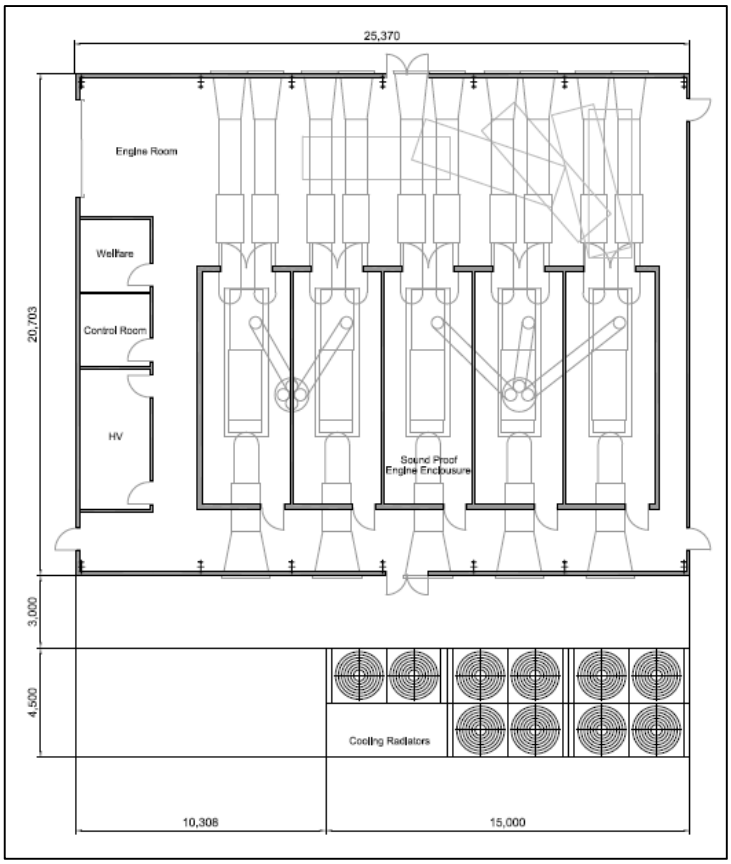
- Installation and operation of a 11MW standby electricity generator and its associated ancillary equipment at Decoy Farm_1; and

- Installation and operation of a 20MW standby electricity generator and its associated ancillary equipment at Decoy Farm_2.

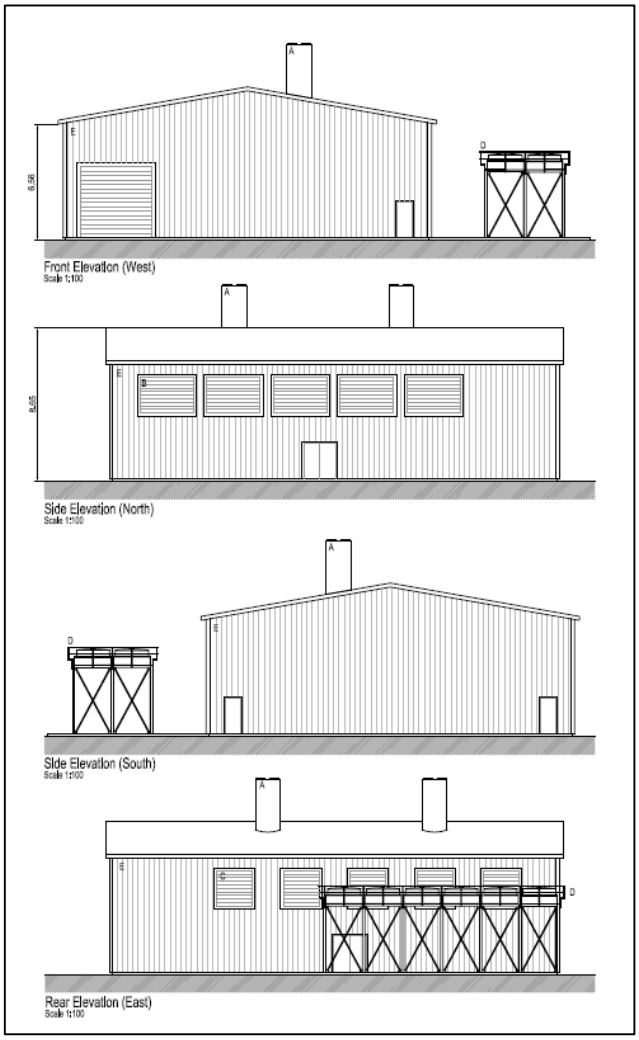
1.3 Site Layout

The proposed site layouts are as follows (not to scale):

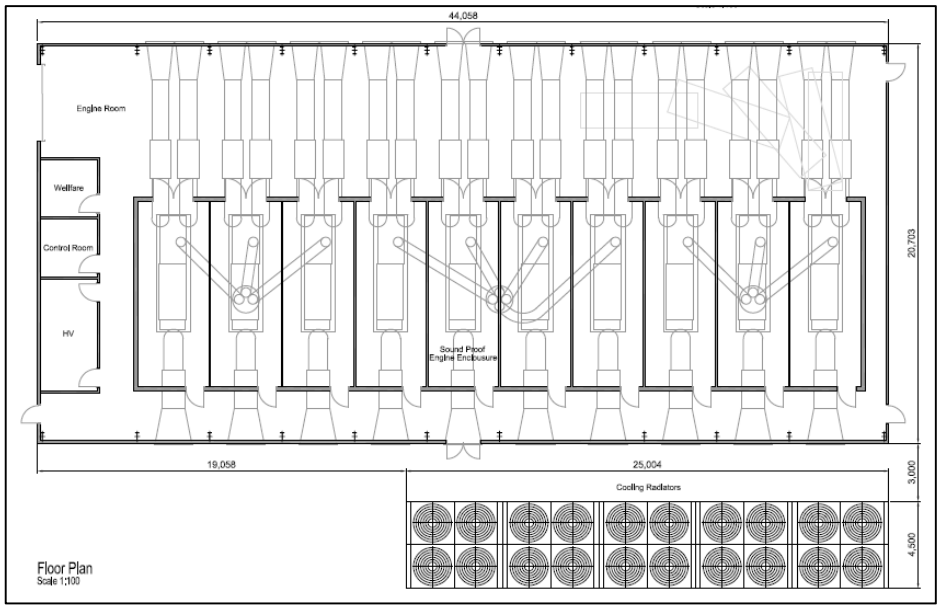
Decoy Farm_1 - Internally:



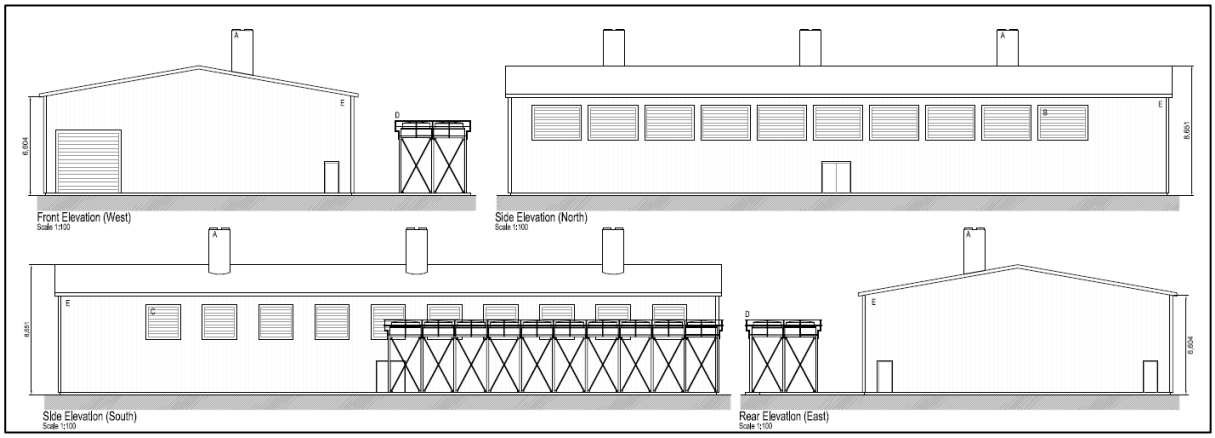
Decoy Farm_1 - Externally:



Decoy Farm_2 - Internally:



Decoy Farm_2 - Externally:



1.3.1 Electricity Generation Plant

The electricity generation plant and associated equipment and facilities will be located on a concrete slab within the compound area, all of which will be acoustically attenuated. The location of the plant within the building structure means that externally the building will appear as an additional agricultural barn within an existing style setting.

As this proposal is a gas fuelled generator, the process is that the engine utilises the gas in order to produce motion for the generator. This is then converted into electricity by using electromagnets.

A substation, transformer and gas kiosk will be located within close proximity to the building to allow for distribution to the National Grid.

Any fuel stored on site will be done so in accordance with the control of pollution oil storage regulations 2001, in secure tanks which are double skinned and bunded. The fuel tanks will be fitted with an overfill prevention and level sensors.

The facility will be unmanned with infrequent visits made for maintenance and refuelling purposes, therefore there will be no need for continuous lighting. There will be security lighting enabled to allow the employed security company a visual at night, further information regarding this can be found in section 1.5 below.

1.4 Development Need

Standby electricity generators are a form of embedded generation that is required as a mechanism to support the National Grid during periods of high energy usage. This allows for a flexible type of generation that can be turned on remotely within seconds as and when the electricity demand is required.

There are very few existing and alternative solutions that can provide such power at short notice, offering a distributed power solution that is the backbone of central Government policy.

Decoy Farm will enter into the capacity market offering a combined total of 31MW of standby electricity to the National Grid when there is a shortage on the network. Historically, this type of generation is only called upon for a few hours per year, however, they are required to remain operational and online 24/7 365 days per year, with peak demand for electricity usually within winter months between 6pm and 9pm.

The National Grid has estimated that the network needs to double its standby capacity by 2020 to avoid rolling blackouts, with this application being made in response to this. In November 2015, as part of the UK emissions policy, the Government announced that all UK coal plants would be closed by 2025. Since the announcement, 4.3GW of coal plants have closed. This therefore increases the need and urgency for flexible standby electricity generators that will replace the retiring coal plants.

1.5 Community Safety

Given the nature of development, safety is paramount. As a result, a risk evaluation has been undertaken to ensure that all components of the proposal are effectively and adequately protected. Access to the building in which the generators are to be located will be restricted and access via coded key fob will only be given to qualified personnel.

A security company will be employed to monitor the facility all year round with the electrical equipment being monitored remotely via the Edge Power Head Office at all times. Should an incident occur, the relevant alarms will be raised and appropriate action taken.

All necessary precautions will be taken to ensure safety at all times.

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2 Planning Policy

2.1 National Policy

The National Planning Policy relevant to the site and proposal is the following:

- The National Planning Policy Framework (NPPF) (adopted 2012)

The NPPF was adopted by Central Government on 27th March 2012. Within the 'Ministerial Foreword' its states that *'the purpose of planning is to help achieve sustainable development'.* Further, the Ministerial Foreword notes that *'sustainable means ensuring that better lives for ourselves doesn't mean worse lives for future generations'.*

The document stipulates that '*sustainable development is about positive growth – making economic environmental and social progress for this and future generations'.* Following on from this the Ministerial Foreword notes that '*development that is sustainable should go ahead, without delay – a presumption in favour of sustainable development is the basis for every plan, and every decision'.*

Paragraph 7 confirms that there are three dimensions to sustainable development: Economic, Social and Environmental. These dimensions give rise to the need for the planning system to perform a number of roles (inter alia):

- An Economic Role – Contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;

- A Social Role – Supporting strong, vibrant and healthy communities, with accessible local services that reflect the communities' needs and supports its health, social and cultural wellbeing;

- An Environmental Role – Contributing to protecting and enhancing our natural, built and historic environment and mitigate and adapt to climate change including moving to a low carbon economy.

Paragraph 8 advised that in order to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system.

Further to this advice, Paragraph 10 notes that plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas.

In applying the NPPF's presumption in favour of sustainable development, and the test at Paragraph 14 in particular with regards to decision taking, **it is duly noted that the proposed development accords with the development plan and as such the application should be approved without delay.**

Paragraph 17 of the NPPF sets out 12 planning principles which should underline both plan-making and decision-taking. The planning principles pertinent to this application proposal include:

- Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the Country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth.

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

- Encourage the effective use of land that has been previously developed (brownfield land), provided that it is not of high environmental value.

- Promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many function (including wildlife, recreation, flood risk mitigation, carbon storage or food production).

- Conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.

Paragraph 19 confirms the Government's commitment to supporting sustainable economic growth and that '*planning should operate to encourage and not act as an impediment to sustainable growth and therefore significant weight should be placed on the move to support economic growth through the planning system'.*

Paragraph 20 states that local planning authorities should have a proactive approach to planning in order to meet development requirements of business in view of supporting an economy fit for the 21st Century, thereby helping achieve economic growth.

Overall, the NPPF confirms that the primary objective of development management is to foster the delivery of sustainable development, not to hinder or prevent it. Local Authorities should approach development management decisions positively, looking for solutions to aid development allowing applications to be approved where practically possible.

The Government's overarching vision throughout the NPPF is that the planning system does everything it can do to support sustainable economic growth whereby there is a presumption in favour of sustainable development.

2.2 Local Policy

The South Holland District Council Local Plan sets out the planning policies which will guide and control new development in the District until 2021, a new Local Plan jointly with Boston Borough Council and Lincolnshire County Council is being prepared. With an estimated adopted date of February 2017, until such a time as this is adopted the Local Plan 2006 remains in place.

Local Plan 'Saved Policies' adopted 2006:

Policy SG1 *- General Sustainable Development*

Planning permission for development will be granted where the Council is satisfied that the proposal is consistent with the principles of sustainable development, and where:

1) the quality of life for residents is unimpaired or enhanced;
2) reasonable measures have been taken to conserve energy and natural resources; and
3) South Holland's essential character and main environmental assets are not damaged.

Policy SG2 *- Distribution of Development*

All proposals for development must be located having regard to sustainable development principles. They should:

1) adopt a sequential approach which gives priority to the use of previously developed land and buildings within defined settlement limits, then to greenfield land within defined settlement limits and finally to land adjacent to defined settlement limits;
2) make efficient use of land;
3) ensure that, wherever possible, development is served by a choice of transport modes including existing public transport or by improvements to public transport infrastructure linked directly to the development and the existing highway network; and
4) ensure that the development is acceptable in terms of traffic generation and road safety in the surrounding area.

Policy SG4 *- Development in the Countryside*

Planning permission will only be granted for development in the open countryside which is essential in the proposed location and cannot reasonably be accommodated within defined settlement limits. Development proposals that would result in an unacceptable impact upon the landscape character of an area, either individually or cumulatively, will only be permitted where:

1) the need for the development in that location outweighs its impact; and
2) no other site or solution exists to accommodate the proposed development.

***Policy EC4** - Farm Diversification Including Re-use of Redundant Rural Buildings*

Proposals for farm diversification projects will be permitted provided that all of the following criteria are met:

1) The proposed activity is compatible with agricultural operations on the farm and would not prejudice the efficient functioning of surrounding land uses.
2) Existing or redundant rural buildings are utilised wherever it is practicable to do so.
3) Where a proposal involves utilising existing buildings which are of architectural or historic merit, the design, materials and detailing of any alterations or additions must be sympathetic to the character and appearance of the building.
4) It does not result in excessive expansion and encroachment of building development into the open countryside.
5) It does not result in an unacceptable traffic impact on roads servicing the site.
6) The development would not result in an adverse impact on neighbouring residential properties or the local landscape and environment.

2.3 Other Material Considerations

2.3.1 Energy Security Strategy

The Energy Security Strategy was published in November 2012 and provides a detailed and open assessment of the UK's current energy security, outlines work already underway to safeguard our energy security, and sets out the policy which the Government is putting in place to ensure that our energy supplies remain secure. On the issue of electricity, the paper identifies:

- The overall outlook for our electricity security is robust but there are potential future risks. Electricity capacity will need to grow as demand is likely to increase by between 30 and 100 per cent by 2050. In the short terms, de-rated capacity margins are expected to tighten due to around a fifth of capacity available in 2011 having to close within this decade.

- Additional capacity and balancing challenges may come in the medium term as existing generation is replaced by more intermittent (renewables) and less flexible (nuclear) generation, and as demand becomes more varied as our heat and transport systems become increasingly electrified. To remain balanced, our system will need sufficient reliable capacity to meet demand as well as a variety of non-generation technologies, including storage, interconnection and demand side response[1].

[1] Department of Energy and Climate Change, Energy Security Strategy, p31

2.3.2 Intermittent Electricity Generation, Parliamentary Office of Science and Technology

The House of Parliament Science and Technology post note Number 464, published in May 2014, deals with sources of electricity that exhibit uncontrolled increase or decrease in output (namely renewable energy) measures to manage intermittency (namely reserve power, such as that proposed through this application). The note identified how the need for a flexible balancing service which can compensate for unpredicted variation within 2 to 240 minutes will increase by around 2GW from 2014 to 2015, due to intermittent renewables. It goes on to state:

'Matching Supply and Demand:

To keep the electricity system working, suppliers and generators attempt to match predicted supply and demand through pre-arranged agreements. However, because of unpredicted changes, generators and suppliers do not always meet their contracted levels of supply or demand at each moment. When this occurs the System Operator (SO), the National Grid in GB, intervenes in its role to balance supply and demand. The SO ensures moment-by-moment supply and demand match by making relatively small, but crucial, adjustments to supply and/or demand at each site using back-up generation or agreed stoppages to some electricity users' supply. These interventions take different lengths of time to respond, so they are used in different ways.

When an imbalance between supply and demand first arises, an inbuilt property of the electricity system, system inertia allows power to be maintained, but only briefly. System inertia is provided by the rotating turbines in conventional generations, but only while they are in operation. If there are more rotating turbines in the generation mix, there is more system inertia and this allows the electricity system to remain stable for longer given an imbalance between supply and demand.

After the initial imbalance the SO's flexible balancing services 'frequency response' and 'operating reserve' are used to maintain balance for different lengths of time. The SO may have contracted these in advance or purchased them from a competitive market. In 2014, National Grid is set to reserve an average of 2GW of frequency response and 5GW of operating reserve'.

The post note identifies how fuel burning generators, such as that proposed through this application proposal, are the most flexible technology for providing additional reliable energy capacity.

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3 Landscape and Visual Impact Assessment

3.1 Introduction

3.1.1 Section Outline

This section considers the effects that the proposed site will have on the existing landscape and visual environments, their characteristic features and on the people who view it. The purpose of the assessment is to identify and assess the likely significant landscape and visual effects.

The assessment will identify the existing landscape and visual baseline environment of the site within a 2km radius study area and assess its quality and sensitivity to change. It will describe the nature of the predicted changes to each receptor, assessing the magnitude of the predicted changes during the construction and operational stages. The assessment will also identify any integral mitigation measures to assist with reducing the significance of the predicted effects, taking into account the sensitivity of the receptors concerned and the magnitude of the predicted changes. This process will be undertaken for the physical landscape effects, for effects on landscape character and for effects on visual amenity.

3.2 The Site

The site is located to the north east of Crowland and south of Spalding. The site is approximately 730m (in a straight line) west of the A16, with the standby electricity generators situated within an agricultural field that incorporates a solar farm and anaerobic digester units. The site is approximately 2m above sea level.

3.3 Assessment Methodology

3.3.1 Section Outline

Edge Power has an established methodology for carrying out Landscape and Visual Impact Assessments (LVIAs) for proposed standby electricity generators. The methodology has been varied slightly to specifically address the Decoy Farm site. The standard methodology that is utilised for Decoy Farm is described below along with any variations specific to this assessment.

3.3.2 Overview

The methodology used has 3 key stages, which are described as relevant to the proposed sites landscape and visual assessment in more detail in subsequent sections, as follows:

- **Baseline** – included the gathering of documented information; site visits and initial reports to Edge Power to be addressed within the design.

- **Design** – the initial layout/options, material choice(s), and mitigation options were considered and fed into the iterative design process.

- **Assessment** – an assessment of the landscape and visual effects of the full scheme, informed by site based work, and the completion of a report and supporting graphics.

The assessment methods draw upon the established Countryside Agency methodology (Landscape Character Assessment Guidance, 2002) and other recognized guidelines, in particular the Institute of Environmental Assessment and the Landscape Institutes Guidelines for Landscape and Visual Impact Assessment, third edition 2002.

3.3.3 Assessment Terminology and Judgements

The key terms used within assessments are Sensitivity, Magnitude and Significance.

In order to undertake the assessment, it is necessary to identify the degree of sensitivity to change and the type of development proposed of both the landscape and the visual receptors. Landscape sensitivity is defined within GLVIA as 'the extent to which a landscape type can accept change of a particular type and scale without unacceptable adverse effects on its character'. The identification of sensitivity also needs to be considered in relation to the type of change i.e. the type of development proposed. The sensitivity of visual receptors is dependent upon the location and context of a specific viewpoint and the viewing experience as well as the occupation/pastime of the receptor and the importance of the view. Landscape and viewpoint receptor sensitivity are generally categorized as High, Medium or Low. These are defined as follows:

Sensitivity	Receptor Type	Definition
High	Landscape	Landscape of particularly distinctive character susceptible to relatively small change.
	Visual	Viewers with a proprietary interest and prolonged viewing opportunities, e.g. principal view from residential properties; users of strategic recreational routes, public rights of way and beauty spots; and those whose attention will be focussed on the landscape.
Medium	Landscape	A landscape of moderately valued characteristics reasonably tolerant of change.
	Visual	Viewers with a moderate interest in their surroundings, e.g. users of outdoor recreation facilities, secondary views from residential buildings, viewers travelling through the landscape on roads including motorists.
Low	Landscape	A relatively unimportant landscape, not valued for its scenic quality and potentially tolerant of substantial change.
	Visual	Viewers with a passing or minimal interest in their surroundings, e.g. views from commercial/industrial buildings or commercially engaged pedestrians (whose attention may be focussed on their work or activity rather than the wider landscape), motorists on major through roads.

Magnitude of effect is assessed for all receptors and identifies the degree of change. It is usually rated on the following scale:

- **High** – Total or major alteration to key elements, features or characteristics, such that post development the baseline situation will be fundamentally changed.

- **Medium** – Partial alteration to key elements, features or characteristics, such that post development the baseline situation will be noticeably changed.

- **Low** – Minor alteration to key elements, features or characteristics, such that post development the baseline situation will be largely unchanged despite discernible differences.

- **Negligible** – Very minor alteration to key elements, features or characteristics, such that post development the baseline situation will be fundamentally unchanged with barely perceptible differences.

Significance indicates the importance of the effect, taking into account the sensitivity of the receptor and the magnitude of the effect. It is usually rated on the following scale (though the wording may be altered at the request of the EIA coordinator):

- **Major** (sometimes called substantial) – Indicates an effect that is very important in the planning decision making process.

- **Major-Moderate** – Indicates an effect that is material in the planning decision making process.

- **Moderate** – Indicates a noticeable effect that is not material in the planning decision making process.

- **Minor** (sometimes called slight) – Indicates an effect that is trivial in the planning decision making process.

- **Negligible** (sometimes called no change) – Indicates an effect that is akin to no change and is thus not relevant to the planning decision making process.

Significant effects (in terms of the EIA regulations) are those that are Major-Moderate or Major. As stated within the EIA regulations, if an effect is not significant, it should be not considered as material to the decision making process. It should also be noted that whilst an effect may be significant, and therefore material in coming to a decision, that does not necessarily mean that such an impact would be unacceptable.

Where intermediate ratings are given, e.g. 'Moderate-Minor', this indicates an effect this is both less than Moderate and more than Minor, rather than one which varies across the range. In such cases, the higher rating will always be given first; this does not mean that the impact is closer to that higher rating, but is done to facilitate the identification of the more significant effects.

The process of forming a judgement of significance of effect is based upon the assessments of magnitude of effects and sensitivity of the receptor to come to a professional judgement of how important this effect is in terms of making a decision about whether planning permission should be granted. This judgement is illustrated overleaf:

	Sensitivity		
Magnitude	**Low**	**Medium**	**High**
High	Moderate	Major-Moderate	Major
Medium	Moderate-Minor	Moderate	Major-Moderate
Low	Minor	Moderate-Minor	Moderate

3.3.4 Landscape Character

The European Landscape Convention (2000) provides the following definition: "Landscape means an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors".

Landscape character assessment is defined as (Natural England website – credited as a quote from the guidance):

"the tool that is used to help us to understand, and articulate, the character of the landscape. It helps us identify the features that give a locality it's 'sense of place' and pinpoints what makes it different from neighbouring areas."

The sensitivity of landscape character areas is based on both the attributes of the receiving environment and the characteristics of the proposed development. Thus, the key characteristics of the landscape character areas are considered, along with scale, openness, topography; the absence of, or presence, nature and patterns of development, settlement, land cover and land uses in forming the character. This condition of the receiving landscape, i.e. the intactness of the existing character is relevant in determining sensitivity. The likelihood of material effects on the landscape character areas can be based on the scale and layout of the proposal and how this relates to the characteristics of the receiving landscape.

3.3.5 Landscape Designations and Value

The sensitivity of designated landscapes is assessed based on their relative value. All landscapes are valued to a greater or lesser extent, and local people generally value open countryside regardless of whether or not it is designated. However, a despoiled or degraded landscape would generally be of Low value (and corresponding Low sensitivity in this respect). Undesignated, 'everyday' countryside would tend to be of Medium value. Nationally designated landscapes, which enjoy statutory protection (National Parks and Areas of Outstanding Natural Beauty) have a High value (and thus a high sensitivity in this respect). Locally designated landscapes would have High-Medium value and sensitivity, as would Heritage Coasts, which though nationally designated, are protected only via local plan policies.

In considering the effects on designated areas, a number of factors need to be considered. The effects on the component landscape character areas and the effects on views from within and towards the designated area need to be understood. These effects are then considered in light of the documented "special qualities" and purposes of the designation, and the proportion of the designated area that is affected, in order arrive at a judgement of the magnitude of effects on the designated area.

Thus the judgement of the significance of effect on designated areas takes into account the value of the landscape (via the sensitivity rating) and the degree to which the purposes of designation are affected (via the magnitude).

3.4 The Existing Visual Environment

3.4.1 Introduction

The purpose of the visual assessment is to determine the extent of the zone of theoretical visibility of the development (the area of land from which it may be possible to see any part of the proposed development) and to determine how visible the proposals would be on general visual amenity, from principal representative viewpoints and on various visual receptor groups. Integral to this is the need to identify and define the character of the existing visual environment and assess its sensitivity to change. This will then provide a baseline against which the assessment of effects can be made using the methodology as described at the beginning of this chapter. Appendix 2, visualizations should be referred to for the corresponding images.

3.4.2 Viewpoint 1 – James Road

This viewpoint is located 2km to the south-west of the proposed site, illustrating the view from the local road network and nearby Crowland. The view is judged as medium, with its large open flat landscape that afford deep set skies allowing for a contrasting view across the landscape.

3.4.3 Viewpoint 2 – Spalding Road

This viewpoint is located 706m to the south-east of the proposed site, demonstrating the view approaching the site from the south on the local road network. The view is judged as medium-low, given the existing infrastructure that does not adversely detract from the overall view it is a working landscape which is represented within this montage.

3.4.4 Viewpoint 3 – Wash Bank

This viewpoint is located 1.9km to the north of the proposed site, detailing the view from public rights of way users and the local roads. The view is judged overall as medium, with the large open skies that give a sense of depth and further enhance the open flat landscape, that at this location is framed by the mature vegetation.

3.4.5 Viewpoint 4 – Cloot Drove

This viewpoint is located 804m to the west of the proposed site, showing the view from local residents and the road network that surrounds the site. The view is judged as medium-low, whilst an attractive landscape it is relatively unremarkable in its form in comparison to other areas across the County.

3.5 Visual Effects

3.5.1 Introduction

Where views of the proposal are described as being screened by vegetation, it is assumed in these cases, unless otherwise stated, that it is not just in the summer months but the layering of the trees and vegetation within the view which will likely to continue to filter and/or screen views towards the site during the winter months when the trees are not in leaf.

3.5.2 Viewpoint 1 – James Road

This viewpoint is located 2km to the south-west of the proposed site and looks directly towards Decoy Farm. As can be seen within the view the anaerobic digester units are visible with glimpses of the solar farm and other buildings associated with the site. Given the vast landscape the proposal will be a discernible feature within a setting that has already undertaken agricultural diversification. Given this, the overall impact in terms of significance of effect is assessed as minor.

3.5.3 Viewpoint 2 – Spalding Road

This viewpoint is located 706m to the south-east of the proposed site, as shown within the view the Decoy Farm complex including solar farm and anaerobic digester units are fully visible within the setting. The proposed agricultural style buildings given their style and design will be insignificant to the receptor at this location, with the significance of effect assessed as negligible. Given that the receptor will be largely unaware of the development owing to the existing infrastructure present on site.

3.5.4 Viewpoint 3 – Wash Bank

This viewpoint is located 1.9km to the north of the proposed site, given the open flat nature of the area Decoy Farm is visible within the view, more specifically the anaerobic digester units. Whilst views of the proposal will be achievable from this location they will not penetrate the skyline and will site against the backdrop of mature vegetation leaving the view uninterrupted and the receptor largely unaware of the development. With this in mind the significance of effect is no more than minor.

3.5.5 Viewpoint 4 – Cloot Drove

This viewpoint is located 804m to the west of the proposed site, where the uppermost parts of the anaerobic digesters on site can be seen over the crops present in the field. The proposal at this location will be visible as with the anaerobic digester units it will be the uppermost portions of the buildings, given that they will not penetrate the skyline and will blend into the background of mature vegetation given their design and siting. As a result, the overall significance of effect is assessed as minor.

3.6 Summary and Conclusion

The assessment process has sought to establish the full extent of the landscape and visual effect arising from the proposed small scale standby electricity generator at Decoy Farm.

The site is located to the north east of Crowland and south of Spalding. The site is approximately 730m (in a straight line) west of the A16, with the standby electricity generators situated within an agricultural field that incorporates a solar farm and anaerobic digester units. The site is approximately 2m above sea level.

It can be considered that the overall nature of the effect that the proposal will have will be generally minor from the majority of the landscape. The buildings proposed are in keeping with the existing agricultural style present on site, and within the area generally, and therefore will be viewed within this context. The building height does not penetrate the skyline allowing for the natural vegetation in many instances to completely obscure it from view within the surrounding area.

From closer viewpoints, within 200-500m, the proposal will be more prominent as it will be within view, however it will be a discernible feature that is considered within the farm complex and negligible to the receptor.

4 Cultural Heritage

4.1 Historic Environment

The key designated heritage assets set within a radius of 1km from the proposed site were identified and assessed. Whilst features of archaeological interest are considered within this section, it is within their capacity as a contributing feature in defining landscape character and the visual issues connected with this, rather than their intrinsic historic or archaeological value or significance.

4.2 Overview of Methodology

The methodology has four key stages:

- **Research** – identify heritage assets within a 1km radius of the site and their significance.
- **Impact Analysis** – identify the impact of the proposed development on the significant assets, including the contribution the proposal will have on the setting and its relative significance.
- **Conclusion** – conclude on the positive, negative or neutral effect of the development on the setting of identified assets.
- **Mitigation** – propose mitigation and or compensation for any negative impacts to ensure that there is no net loss to the historic environment resource.

4.3 Assessment Terminology

- **Setting** – Setting is defined as the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset and may affect the ability to appreciate that significance or may be neutral.
- **Heritage Asset** – This constitutes any aspect of the built or natural environment deemed to have historic or archaeological significance. Heritage Assets can be one structure, a group of buildings, or a landscape. They do not need statutory designation to be worthy of consideration as assets.

4.4 Significance of Setting to Heritage Assets

The following descriptions highlight the significance of the assets and their setting in the area of the proposed installation. These descriptions aim to consider, insofar as possible, the physical surrounding of each asset, including its relationship with other heritage assets and the setting; the way the asset is appreciated; and the assets' associations and patterns of use. It is worth noting that no physical works are to be carried out to the Heritage Assets themselves, therefore the significance of the assets will remain the same.

4.5 Description of a Listed Building

English Heritage lists buildings to help them 'acknowledge and understand' the history of the United Kingdom; by listing a building, it 'celebrates its special architectural and historical interest' and ensures

that it will be considered and preserved. All buildings built before 1700 which survive in anything like their original condition are listed, as are most of those built between 1700 and 1840. Any buildings built since 1945 have to be exceptionally important to be listed; this is due to the criteria for listing becoming tighter for modern built buildings. For a building to be considered important enough to receive listed status, a minimum age of thirty years is usually required.

There are three different categories a listed building can be classed in: Grade II is defined by English Heritage as 'nationally important and of special interest' with Grade II* being 'particularly important and of more than special interest'; Grade I buildings are of 'exceptional interest, sometimes considered to be internationally important'. 92% of listed buildings are Grade II, 5.5% are Grade II* with the remaining 2.5% listed as Grade I. When buildings are listed they are placed on the statutory list of buildings of 'special architectural or historic interest' which are compiled and approved by the Secretary of State for Culture, Olympics, Media and Sport under the Planning (Listed Buildings and Conservation Areas) Act 1990.

Listing identifies only those buildings which are of national 'special interest'. Some of the main criteria used are:

- **Age and Rarity:** most buildings built before 1700 which survive in anything like their original condition are listed.

- **Architectural Interest:** buildings which are nationally important for the interest of their architectural design, decoration and craftsmanship; also important examples of particular building types and techniques.

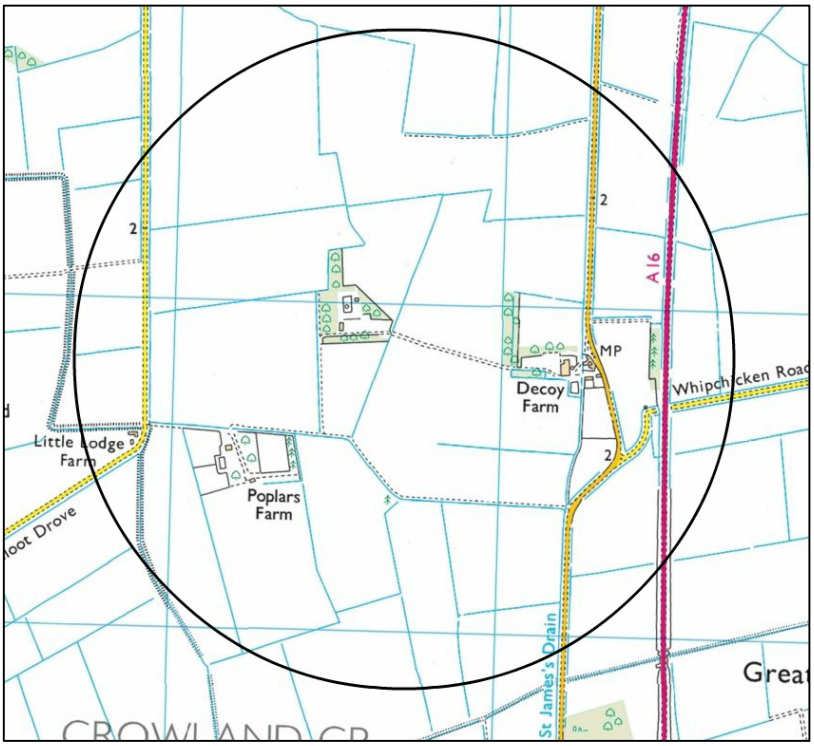
- **Historic Interest:** this includes buildings which illustrate important aspects of the nation's social, economic, cultural or military history.

4.6 Listed Buildings

This assessment aims to evaluate the extent of the impact the proposal would have on local heritage assets situated within a 1km radius of the site. The assessment includes desktop research into the presence and significance of archaeological and historical heritage assets, their significance in relation to the general heritage setting and the effects of the proposed development on this setting. Through individual assessment of key historic features, an impact analysis has been carried out with conclusions drawn on the overall impact of the proposed development; these include positive, negative or neutral effects. Where necessary, the assessment considers proposals to avoid, mitigate or compensate for potential negative impacts of the development.

An area within a localised 1km radius of the proposed sites location was examined with the objective of identifying nearby listed buildings. This radius was chosen as it took into consideration the fact that the proposal is largely shielded by natural vegetation and owing to its small scale and design will feature within the existing agricultural environment.

The assessment highlighted the following:



Within a 1km radius of the proposed site, no listed buildings or heritage assets were identified, therefore it can be concluded that the overall impact from the proposed standby electricity generators will have no impact.

4.7 Scheduled Ancient Monuments

There are no identified Scheduled Ancient Monuments (SAMS) within 1km of the proposed site.

4.8 Other Designations

There are no other identified designations within 1km of the proposed site.

4.9 Impact-Benefit Analysis

This section aims to weigh up the benefit of the proposal against any harm or loss to heritage assets and their setting. This analysis will focus on the heritage assets identified in the previous sections of this chapter.

As no heritage were identified the overall impact is considered as negligible.

4.10 Summary and Conclusion

To conclude, no heritage assets were identified within 1km of the proposed developments. Therefore, given the small scale and unassuming nature of the proposals the overall impact is negligible.

With any heritage assets beyond the 1km buffer unaffected given the style and overall design that allows for the proposals to be incorporated into their surroundings causing no visual harm and an overall negligible impact.

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5 Ecology

5.1 Introduction

Planning policy requires that internationally and nationally designated sites be given the strongest level of protection against development. This application site is located within an existing farmyard on land that is currently surrounded by land used for agricultural purposes, and therefore does not form part of any statutory or non-statutory designated sites.

5.2 National Legislation

Species in need of special protection in Britain, for reasons of dramatic decline, loss of habitat, rarity or restricted distribution, are listed under the various Schedules of the Wildlife and Countryside Act 1981 (as amended). Schedule 1 covers birds, while Schedules 5 and 6 cover vertebrates (other than birds) and invertebrates respectively.

Schedule 1 of the Wildlife and Countryside Act 1981, Part 4, lists selected birds which are afforded special protection. This protection is greater than for other birds and includes it being an offence to disturb a bird whilst it is building a nest or is in, on, or near, a nest containing young of a Schedule 1 species.

Schedule 5 of the Wildlife and Countryside Act 1981 lists non-avian animals that are afforded special protection. Relevant to development plans, this Schedule makes it an offence to damage, destroy or obstruct access to, any structure or place which any Schedule 5 animals inhabit. It is also an offence to disturb any such animal while it is occupying a structure or place, which it uses for that purpose. This legislation has been updated by the Countryside and Rights of Way Act 2000, which includes design measure to prevent reckless disturbance. For certain species, different levels of protection are afforded.

Schedule 8 of the Wildlife and Countryside Act 1981 lists species of plants that are afforded special protection. Whilst the protection afforded to plants is less complex than for birds or animals, the underlying protection is basically the same. Specifically, it is an offence to pick, uproot or destroy any species listed on Schedule 8 without prior authorisation.

5.2.1 Protected Species

Badgers (*Meles meles*) and their setts are protected under the protection of Badgers Act 1992. This means that it is unlawful to knowingly kill, capture, disturb or injure an individual or intentionally damage, destroy or obstruct an area used for breeding, resting, or sheltering by Badgers.

All bat species are protected in accordance with Schedule 5 of the Wildlife and Countryside Act 1981. This protection extends to both the species and roost sites. Likewise, bat roosts are protected at all times of the year, regardless of whether bats are present at the time. In addition, all bat species are also listed under Annex II of 92/43/EEC, and are given UK protected status by Schedule 2 of the Conservation (Natural Habitats etc.) Regulations 1994.

Water Vole (*Arvicola terrestris*) are protected in accordance with Schedule 5 of the Wildlife and Countryside Act 1981. The protection is now in respect of all parts of Section 9. This section of the Act affords protection to the Water Vole's shelter and also protects the animal itself. This protection has been provided in recognition of a significant decline in numbers in recent decades in population sizes which has been primarily as a result as habitat loss of opposed to direct persecution. The legal protection makes it an offence to intentionally damage, destroy or obstruct access to any structure of

place which Water Voles use for shelter or protection, or to disturb Water Voles whilst they are using such a place.

Otters (*Lutra lutra*) are protected in accordance with Schedule 5 of the Wildlife Countryside Act 1981. The Otter is also a protected species included in Schedule 2 of the Conservation (Natural Habitats etc.) Regulations 1994, and is protected under Annex II of 92/43/EEC. It is an offence to intentionally kill, injure or take an Otter from the wild, or to intentionally or recklessly damage, destroy or obstruct access to any habitat used by Otters or to disturb the Otters which make use of those habitats.

All wild birds are protected under the Wildlife and Countryside Act 1981. This prevents killing or injuring any bird or damaging or destroying nests and eggs. Certain species are specially listed under Schedule 1 of the Wildlife and Countryside Act 1981, which prevents disturbance of the species or its nest and/or eggs at any time, and are protected by special penalties. There are certain birds excluded from the general stipulations under the Wildlife and Countryside Act 1981 (e.g. quarry and agricultural pest species such as Woodpigeon and Carrion Crow). Certain bird species are listed in Annex I of the EC Birds Directive (BoCC), which fall into three categories: Red list (species of high concern); Amber list (species of medium concern); and Green list (species of lower concern). Species are placed on these lists based, among other criteria, on the percentage decline of breeding and wintering populations in the recent past.

All native reptiles are listed on Schedule 5 of the Wildlife and Countryside Act 1981, though they are afforded different levels of protection. For the four most commonly occurring species Adder (*Vipera berus*), Grass Snake (*Natrix natrix*), Slow-worm (Anguis fragilis) and Common Lizard (*Lacerta vivipara*), the protection extends to prohibit killing and injury although does not include habitat protection. In practice when the presence of retiles is confirmed, the legislative protection requires that a mitigation programme is undertaken to make 'reasonable effort' to remove animals prior to the commencement of any site preparation or development. In certain parts of the country, the presence of one or all of our four commoner species of reptile could be regarded as a conservation issue as opposed to essentially an animal welfare issue.

Great Crested Newts (*Triturus critatus*) are fully protected in accordance with both national and international legislation. Specifically, the species is listed on Schedule 5 of the Wildlife and Countryside Act 1981, making it an offence to knowingly kill, injure, disturb, handle or sell the animal. The protection is afforded to all life stages and includes both the terrestrial and aquatic components of its habitat. The species is also listed under Annexes II and IV(a) of European Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora.

The other native amphibians, including Common Frog (*Rana temporaria*), Common Toad (*Bufo bufo*), Palmate Newt (*Triturus helveticus*) and Smooth Newt (*triturus vulgaris*), are protected by Section 9(5) of the Wildlife and Countryside Act 1981. Section 9(5) only prohibits the sale, possession or transport for the purpose of sale, and advertising the buying or selling of listed animals.

5.3 The Site

Having conducted a thorough desk based assessment and site walkover, within the immediate vicinity of the proposed site there are no designated ecological features that require further assessment. The site itself is an open agricultural field bordered by a solar farm and newly installed anaerobic digester units, surrounded by further agriculturally cultivated fields, as shown in the image overleaf:



As shown in the image above the site is open and flat with ditches running through the fields allowing for irrigation. The site is already developed and therefore the ecological potential of the site has been previously assessed and deemed adequate. The addition of two agricultural style buildings taking up a small footprint within in the site in terms of overall impact is considered to be minor.

5.4 Summary and Conclusion

In overall summary and conclusion, the development of the proposed site will cause no disruption nor interference with any designated ecological feature. Nor will there be disturbance to anything deemed locally important to the site, given the responsible construction methodologies and best practices that will be enforced at all times ensuring minimal disruption and displacement.

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6 Hydrology

6.1 Introduction

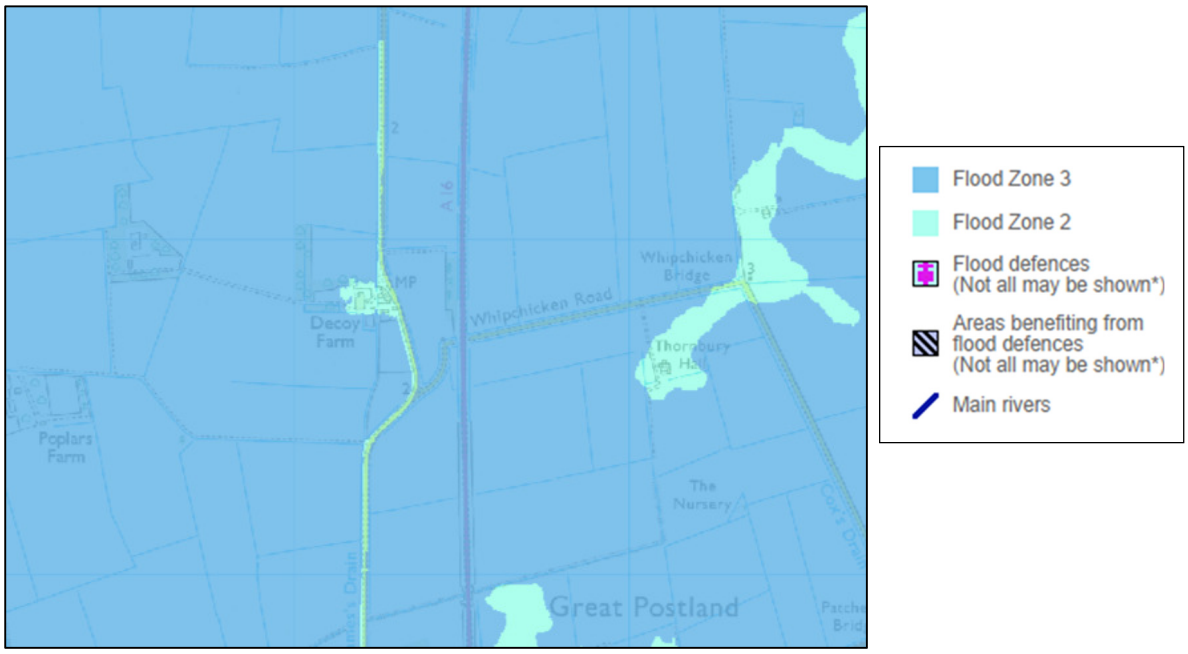
"Flood risk" is a combination of the probability and the potential consequences of flooding from all sources – including from rivers and the sea, directly from rainfall on the ground surface and rising groundwater, overwhelmed sewers and drainage systems, and from reservoirs, canals and lakes and other artificial sources.

6.2 The Site

The site is located to the north east of Crowland and south of Spalding. The site is approximately 730m (in a straight line) west of the A16, with the standby electricity generators situated within an agricultural field that incorporates a solar farm and anaerobic digester units. The site is approximately 2m above sea level.

6.3 Flood Risk

From assessment of the Environment Agency flood maps, the site is within flood zone 3. Whilst within the flood zone the proposal will take adequate precautions in terms of ensuring essential equipment is raised from the floor and similar precautions to that of the adjacent substation:



6.4 Summary and Conclusion

The proposed site although within flood zone 3 will have no impact on the area in terms of flooding with suitable construction procedures adhered to ensuring essential equipment is unaffected should flooding occur, therefore the overall impact is assessed as minor. Surface water drainage will be by natural soakaway therefore emphasising the impact as minor.

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7 Acoustic Assessment

7.1 Introduction

Sharps Redmore has been instructed by Edge Power to carry out a noise assessment to accompany a planning application for the installation of a standby generator facility at Decoy Farm, Spalding Road, Crowland, Peterborough (The Proposal) which will include gas powered generators, transformers and cooling condensers for the generation of standby electricity to the National Grid.

The proposal consists of 10 gas generators, 1 transformer and 20 cooling condensers. The development will operate for approximately 1500 hours per year providing an energy output of 10MW. The development will operate for approximately 2 hours in the morning and similar times in the evening at peak demand times for electricity supplementing the National Grid.

The operation of the development will be intermittent and will be demand led. It is however, not envisaged that the development will operate at night time between the hours of 2300 and 0700.Please refer to Appendix 3 for the full acoustic assessment report.

7.2 Summary and Conclusion

A noise assessment has been undertaken to consider the impact (if any) on the nearest residential property outside of the development and considers the noise source data used, predicted levels and target levels using appropriate standards and methodology. This report provides an assessment to determine external noise limits for the proposed plant relative to that of the nearest noise sensitive property outside of the development.

It is concluded that the proposed standby generator facility would operate well below (around 7dB below) the lower limiting value provided of 35dB LAeq t at the nearest noise sensitive receptors outside of the proposal. Any rating level for the operation would not exceed existing backgrounds and would be considered to have little or zero impact with reference to BS4142:2014.

Additionally, predicted levels at the nearest property with financial interest are well below (3dB) the lower value and well within guidance and criteria in BS8233:2014 and WHO guidelines for community noise.

It is concluded that the proposed standby generator facility can be developed and operate without causing significant impact from noise or detriment to the amenity in accordance with the NPPF, NPSE relevant standards and criteria and local aims.

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8 Air Quality

8.1 Introduction

Entran Ltd have been commissioned by Edge Power Limited to carry out an assessment of local air quality impacts associated with the proposed development of a short-term operating reserve (STOR) peaking power plant.

An increasing proportion of the electricity generation capacity is coming from renewable sources. In order to manage short term fluctuations in demand and supply, the national grid has access to a number of reserve power generators, which can be used at short notice to cover any gaps in demand and supply.

The potential impacts of the proposed development on local air quality during the operational phase has been assessed. The type, source and significance of potential impacts are identified and the measures that should be employed to minimise these impacts are described.

The key pollutants considered in this assessment are: oxides of nitrogen (NOx as NO2) and carbon monoxide (CO), the primary pollutants arising from the combustion of natural gas. The emissions of other pollutants commonly associated with combustion such as sulphur dioxide (SO2) and particulate matter (PM10) are not significant when using this fuel type.

Predicted ground level concentrations of these pollutants are compared with relevant air quality standards and guidelines for the protection of human health and sensitive habitats.

A glossary of common air quality terminology alongside the full report can be found within Appendix 4.

8.2 Summary and Conclusion

European Directive 2008/50/EC of the European Parliament and of the Council of 21st May 2008, sets legally-binding Europe-wide limit values for the protection of public health and sensitive habitats. The Directive makes it clear that the ambient air quality standards shall not be enforced where there is no regular public access and fixed habitation.

The Government's policy on air quality within the UK is set out in the Air Quality Strategy (AQS) for England, Scotland, Wales and Northern Ireland (AQS) published in July 2007, pursuant to the requirements of Part IV of the Environment Act 1995. The AQS sets out a framework for reducing hazards to health from air pollution and ensuring that international commitments are met in the UK. The AQS is designed to be an evolving process that is monitored and regularly reviewed.

The air quality objectives are medium-term policy based targets set by the Government which take into account economic efficiency, practicability, technical feasibility and timescale. Some objectives are equal to the EPAQS recommended standards or WHO guideline limits, whereas others involve a

margin of tolerance, i.e. a limited number of permitted exceedances of the standard over a given period.

For some pollutants there is both a long-term (annual mean) standard and a short-term standard. In the case of NO2, the short-term standard is for a 1-hour averaging period, whereas for CO it is the 8-hour averaging period. These periods reflect the varying impacts on health of differing exposures to pollutants.

The Industrial Emissions Directive (2010/75/EU) came into force on the 6th January 2011, replacing the seven existing Directives, including the Waste Incineration Directive (WID) and Large Combustion Plant Directive (LDPD), implemented through the Environmental Permitting Regulations (EPR). The IED has been transposed into UK law via the Environmental Permitting (England and Wales) (Amendment) Regulations 2013 (SI 2013 No, 390), which came into force on 27 February 2013.

Combustion activities listed in Section 1.1, Part (A) 1 of Schedule 1 of the Environmental Permitting Regulations will normally require an environmental permit issued by the Environment Agency. This section includes combustion appliances with an aggregated rated thermal input of greater than 50MW. The thermal input of the proposed combustion activities will be less than 50MWth. As such, the plant will not be regulated under IED. However, the medium combustion plant Directive (MCPD) which came into force on 18th December 2015 relates to combustion plant of a certain size (1-50MWth) is regulated in terms of emissions to air, where it is not already covered by other Directives (such as IPPC, for example). The proposed scheme will be encompassed within the MCPD.

Paragraph 122 of the NPPF states that planning authorities should assume that the MCPD will be applied and operate effectively. The site is not within an AQMA, nor does it have the potential to significantly impact on an AQMA. Similarly, the site is not located close to any ecological sites with national or European protection.

The nature of the site, as a STOR, will mean that any emissions are infrequent and short-lived. This will result in impacts being very low in any one year and being highly unlikely to lead to any breaches of air quality objectives.

Based on the above information, it is considered unlikely that the proposed scheme will lead to any potential for air quality impacts above levels which would be likely to result in declaration of an AQMA. However, a detailed dispersion modelling assessment will be carried out to confirm the above assumptions.

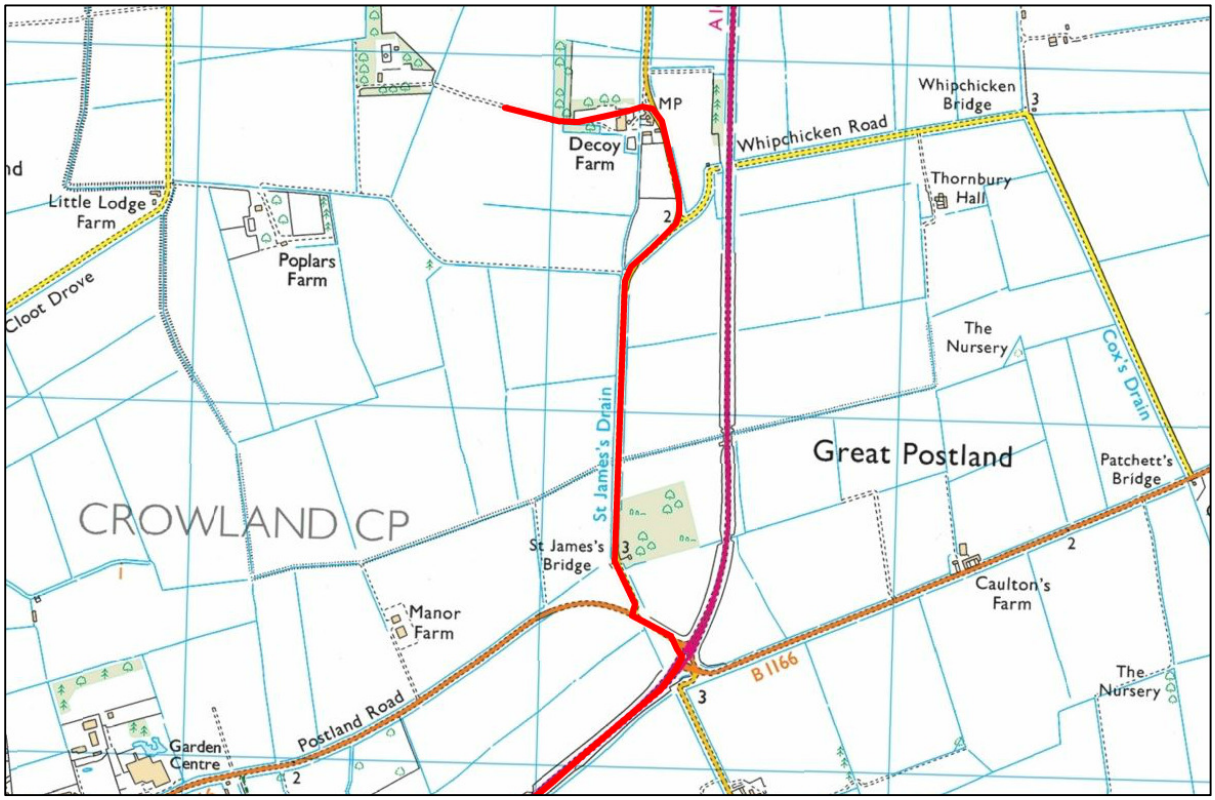
9 Traffic and Transport

9.1 Introduction

Within this section, the traffic and construction management plan sets out the proposed access arrangements, construction programme including traffic numbers and other associated activities relating to the installation of the Decoy Farm standby electricity generators.

9.2 Proposed Transport Route

Construction traffic and deliveries will come from the A16 turning onto B1166/Spalding Road, travelling north before turning left into the site entrance heading west into the farm complex, as shown below:



The route as shown above has no restrictions or limitations, with vehicles similar to those associated with the development utilising the road on an everyday basis.

9.3 Site Access and Movements

Access to site will be from the A16 on to B1166/Spalding Road, this is as shown overleaf:



As shown by the above image, the junction with B1166/Spalding Road requires no improvements, with an existing wide splay to allow for clear visibility of oncoming traffic, easily accommodating the required vehicles for installation and maintenance as required.

The site entrance itself in to Decoy Farm is currently used for access to the onsite businesses and for agricultural purposes. With a wide enough angle to allow for the required vehicle movements, an approximate number of 55-65 vehicles over the construction period of 4-5 months per application. All construction and delivery vehicles will enter and exit at this point with the assistance of a banksman, during construction, who will indicate when it is safe to do so. This will further stagger the vehicles arriving and exiting the site and avoid impacting the existing uses of the site, the access point is shown in the image below:



Once on site there will be parking facilities within the temporary site compound that will be located near to the proposed site, this will allow for unloading, storage of material and manoeuvring of construction vehicles. The area will be completely removed at the end of the construction period.

9.4 Plant Equipment

The typical plant equipment required for the installation is as follows, this list is not exhaustive but merely an indication of the types of vehicles required and its function:

- JCB Diggers – Trenching
- Dump Trucks – Earth removal as required
- Vibrating roller – Compacting access tracks/compound area
- Tele handler/Crawler – Distribution of materials
- Crane – Lifting of ancillary equipment into place and installation of welfare facilities for onsite staff
- Fuel Bowser – To refuel plant as required

9.5 Management of Construction Traffic

During busier periods of the construction process, deliveries to the site will be staggered with drivers given specific time windows for site arrival. To manage this, communication will be required between the site manager and source manager. This will involve vehicles waiting in appropriate locations along the A16 requesting approval to progress to site prior to doing so.

9.6 Route Signing

Due to the route following a strategic highway network it is considered that no discreet vehicle signing will be required apart from at the site entrance itself. A temporary site entrance sign, in accordance with the current traffic sign regulations and general discreet (TSRGD), will be appropriately placed and removed once works are complete.

9.7 Vehicle Cleaning

To minimise the risk of debris from site works being deposited on public highways a wheel wash shall be positioned at the site entrance. All construction vehicles leaving the site must use the wheel wash before travelling along the public highways. Owing to the overall low numbers of vehicles leaving the site a manual wheel wash will be in place, similar to the one shown overleaf:



Additionally, provision will be made for a road sweeper to be deployed should it be required on Spalding Road to remove any construction debris. Construction management staff shall regularly monitor the cleanliness of the road and deploy the sweeper as necessary.

9.8 Summary and Conclusion

Overall with the measures as discussed within this section alongside the absence of abnormal loads and the short construction period, the impact on the local highways is considered as low. The chosen route is capable to deal with the vehicles required for the installation and subsequent deliveries, with the pre-existing access requiring no further upgrades.

10 Socio Economics and Environmental Benefits

10.1 Principle of Development

The requirement for decentralised flexible energy generation facilities is well supported by Government Policy. There is a clear need for new electricity generation capacity, and flexible energy generation from fossil fuel sources is a necessary and vital part of the Government's Strategy for the decarbonisation of electricity generation and supply security.

In spite of the fact that the proposal will not generate a renewable source of electricity, it will deliver the flexible back-up generation capacity that will allow for a greater reliance on renewable energy in the generation mix. For example, generation from solar and wind power is variable, so these back-up systems can help meet demand at times when less is being generated from sources such as solar and wind. As such, the proposal will provide the attendant infrastructure that supports renewable energy development.

The proposal will consequently contribute to moving electricity generation to a low carbon future, thereby according with the objectives set out in the NPPF, and supports the sustainable energy generation and adaptation to the challenges presented by climate change.

Overall, the need for developments such as that proposed are clearly outlines within the Government's energy strategy and in national planning policy. The proposal will contribute to meeting this requirement and this should be handed considerable weight in the determination of this planning application.

10.2 Scheme Benefits

The development will provide employment and business opportunities for component suppliers/installers and those involved in grid connection, transport and logistics. Where possible, local businesses will be contracted for relevant aspects of work over the construction, operation and maintenance periods. There will be additional induced impacts during the construction period where workers will spend wages in the local area including restaurants and shops and also utilising local accommodation. There will also be the support in long term jobs relating to site operation, site security and on-going management and maintenance.

The proposal will provide back-up generation at peak use times that will help maintain grid supply and improve energy security both locally and nationally. This is an absolute necessity in order to progress towards an energy mix with a greater emphasis on renewable energy, to ensure that the 'troughs' in supply (the variable nature of the wind and sun) do not harm grid parity and security.

The application proposal would support growth and prosperity in the energy sector and improve energy security by diversifying the region's energy supply mix and thus helping to insulate local communities from potential black outs.

Given the current economic climate the proposal will provide essential diversification for the farm associated with Decoy Farm, allowing for an additional income source that will enable the farm to continue to function, providing further assistance to the rural economy.

11 Summary and Conclusion

The proposal at Decoy Farm is in accordance with the Government's energy strategy and national planning policy, which establish the urgent need for new flexible and reliable electricity generation capacity so as to help secure a reliable and low carbon electricity supply, as the electricity market is currently in reform.

The proposal is small in scale and relatively low level, having been carefully designed and sited to fit within its surroundings of an agricultural holding.

The proposal will for the majority of the time not be operational, but will have the capacity to be turned on by National Grid as and when demand is required to supply electricity as required.

In summary, the proposal responds to the urgent need that is established in the Government's energy strategy and in local and national planning policy. Therefore, in accordance with Paragraph 14 of the NPPF, the planning application should be approved without delay.