

Date: 19 March 2026  
Our Ref: 14278g

**DWD**  
69 Carter Lane  
London  
EC4V 5EQ

Nick Atkinson and Phil Norman  
South Holland District Council  
Council Offices  
Priory Road  
Spalding  
Lincolnshire  
PE11 2XE

Dear Nick and Phil,

**THE TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT) (ENGLAND) ORDER 2015, ARTICLE 7 AND SCHEDULE 2, PART 15 CLASS B.2(D)**

**Introduction**

This Design Note supports a prior approval application submitted to South Holland District Council ('SHDC') under the Town and Country Planning (General Permitted Development) (England) Order 2015 ('the GPDO 2015'), Part 15, Class B.2(d), which in turn supports and has been submitted in parallel to a planning application for a Lawful Development Certificate ('LDC'). Both applications have been submitted on behalf of Spalding Energy Company Limited ('SECL' or 'the Applicant'), a wholly owned subsidiary of InterGen, in relation to land located at Spalding Power Station, West Marsh Road, Spalding. SECL is the owner of the land subject to the LDC application and this prior approval application.

Both the LDC application and this prior approval application are subject to statutory 8-week determination periods under the Town and Country Planning (Development Management Procedure) (England) Order 2015, Article 39 and the GPDO 2015, Article 7 respectively. Whilst there is no express procedure set out in the GPDO 2015 for the prior approval of the design details, the urgency of the National Energy System Operator ('NESO') requirements is emphasised and we politely request that both are determined in parallel within the statutory determination timeframes.

The LDC application relates to the Proposed Development, which comprises the erection of three container units each housing a circa 2 megawatts ('MW') generator, three circa 120,000 litre fuel tanks (one per generator), three transformers (one per generator), underground cabling, and associated hardstanding associated with the Spalding Power Station undertaking.

The Proposed Development is to be erected under Part 15, Class B (electricity undertakings) of the GPDO 2015, if consent of the LDC application is granted.

In compliance with Part 15, Class B.2(d) of the GPDO 2015, this Design Note has been provided to outline the key design considerations of the container units, including elements of their purpose, appearance, and access. The prior approval application is supported by this Design Note and the following documents:

- Site Location Plan (ref. SP01; rev. 02);

- Proposed Site Layout Plan (ref. PL01; rev. 02);
- Container/Genset drawing (ref. SD01; rev. 03); and
- Step Up Transformer drawing (ref. SD02; rev. 01).

It is noted that Part 15, Class B.2(a) requires replacement electric lines to comply with any conditions contained in the extant planning permission relating to the height, design or position. In this instance, there is no existing electric line being replaced and therefore this does not apply to the proposed underground cable.

### Purpose

As per the GPDO 2015, this Design Note relates solely to the three container units, which are proposed to house emergency generators in association with the operational Spalding Power Station. Design details for the other proposed items of infrastructure are not required under the GPDO 2015 and therefore do not require prior approval.

The red line boundary including the existing access comprises 0.086 hectares ('ha'). The footprint of the Proposed Development is approximately 160 m<sup>2</sup> and would comprise the fuel tanks/containers (119 m<sup>2</sup>), the transformers (15 m<sup>2</sup>), and stairs to the containers (26 m<sup>2</sup>). The Proposed Development also includes an underground electric cable. The maximum external dimensions of the proposed aboveground equipment are:

- Container units, including stairwells, and fuel tanks (combined): 14.1 m (L) x 5.2 m (W) x 6.7 m (H); and
- Transformers: 2.4 m (L) x 2.1 m (W) x 2.05 m (H).

The scale of the Proposed Development is fit for purpose in order to safely and securely provide emergency generators and associated ancillary equipment to Spalding Power Station, as required by the new Grid Code adopted by NESO. NESO has a statutory obligation to ensure the continuity of the electricity supply in Great Britain. This is achieved through the publication of the Grid Code, a document which sets out the technical standards all generating undertaker, including the Applicant, have to follow. NESO periodically revise the Grid Code to reflect current risks and concerns and recently issued new obligations that relate to the resilience of the electricity grid. In particular, these cover the ability to restore the grid if there were to be a widespread and unforeseen outage. All generating plants, including the Spalding Power Station, must remain available to generate (i.e. be able to run ancillaries and safety critical functions, maintain administration and control functions, and be able to fire up, all of which require an electricity import) for a period of up to 72 hours without any external grid connection providing the electricity import.

Diesel generators are quickly deployed and reliable and are commonly installed for backup power in a range of contexts including industrial and commercial premises. The deadline for project completion is December 2026; this is a non-negotiable compliance deadline set by NESO and its regulator Ofgem.

On the Spalding Power Station site, the system (the Proposed Development) will take the form of a diesel generator set, located externally within an acoustic enclosure, which can withstand a 72-hour blackout in compliance with the latest issue of the Grid Code. Notably, the proposed generators would be able to run on Hydrotreated Vegetable Oil (HVO) as well as diesel, or a blend of the two. HVO is a sustainable, drop-in diesel alternative that reduces net greenhouse gas emissions by up to 90% compared to fossil diesel. Made from waste products, it offers cleaner combustion with up to 30% fewer particulate matters and 27% fewer emissions, directly improving air quality without requiring engine modifications.

The Proposed Development will be set back from boundaries and from easements to the National Grid electricity pylon, and other utilities and circulation areas.

The precise location of the Proposed Development can be seen in the submitted Site Location Plan submitted with this application (ref. SP01; rev. 02).

### **Appearance**

The Proposed Development is characterised by its functional and efficient design, which is of similar colours and materials to the other infrastructure within Spalding Power Station.

The container units are identical and do not exceed the 15 m height limit stipulated by the GDPO 2015. The Proposed Development is located within the eastern area of the operational power station. Its scale and form are consistent, and actually considerably smaller, with the adjacent power station buildings and would not result in any perceptible change to the established built environment. Accordingly, the Proposed Development is not considered visually intrusive, as it would not affect wider views of the area and is not overlooked by surrounding developments, buildings, or dwellings.

To minimise visual impacts, the container units will comprise metal modular containers finished in RAL 5025 Pearl Gentian Blue. This material requires minimal to no maintenance whilst providing suitable performance and would preserve the established appearance and character of Spalding Power Station.

The Site and surrounding area benefits from existing lighting associated with the adjacent highway and the wider power station site. However, as shown on the submitted Container/Genset drawing (ref. SD01; rev. 03), a small bulkhead light will be provided above each access door to ensure the safety and security of persons required to access the containers at nighttime.

The Proposed Development would be removed from the Site at such time as Spalding Power Station is no longer generating electricity commercially and the wider site is being cleared.

### **Access**

The Proposed Development benefits from being sited directly adjacent to Gate B of Spalding Power Station, which provides direct two-way access for construction traffic to West Marsh Road and already serves larger vehicles. Once operational, the Proposed Development will be accessed by site staff only via internal access roads. Access via Gate B on West Marsh Roads will only be used for fuel deliveries (rare) or in emergency situations.

Vehicular access will be facilitated from the public highway via the aforementioned gate, which will enable vehicles to access the north of the Site via the existing internal highway network. Any vehicle and personnel movements associated with the Proposed Development, both on Site and on the surrounding road network, would be indistinguishable from existing operational activities at the power station, which already accommodates regular vehicle and personnel movements in the vicinity.

### **Summary and Conclusion**

The relevant application fee of £588.00 plus the £85.00 service charge has been paid via the Planning Portal. We consider the proposal falls under “Prior Approval: Development for electronic communications network” for a site of 0.086 ha.

The Proposed Development is designed to provide safe and secure emergency generators to support the existing and operational Spalding Power Station, in compliance with the new Grid Code adopted by NESO. The deadline for project completion is December 2026; this is a non-negotiable compliance deadline set by NESO and its regulator Ofgem.

It has been demonstrated that the appropriate approach in terms of purpose, appearance, and access has been fully considered. As such, we politely request the issuing of prior approval for the design details for the Proposed Development discussed above, at the same time as any grant of the parallel Lawful Development Certificate application and no later than the eight weeks provided for in article 7 of the GPDO.

I trust you have all the information you require to register and determine the prior approval application. I would be grateful if you could please confirm receipt of this application at the earliest opportunity.

Please contact my colleague Ollie Williams ([ollie.williams@dwd-ltd.co.uk](mailto:ollie.williams@dwd-ltd.co.uk)) and myself via the details below should you have any queries in relation to this application. We would be happy to hold a meeting to discuss this prior approval application, should it be helpful.

Yours sincerely,

**Elisha Dunn AssocRTPI**

**Associate**

**DWD**

Elisha.Dunn@dwd-ltd.co.uk

[07917 195 521](tel:07917195521)