Planning, Design and Access Statement

Construction of a Battery Energy Storage System (BESS)

Sutton Bridge Solar Farm, Walpole, Sutton Bridge

Hollygreen Energyfarm Ltd

December 2024

IC Planning

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1 Introduction

Overview

1.1 IC Planning was appointed by Envams on behalf of Hollygreen Energy Ltd (100% owned by EDF Renewables Ltd) ('the Applicant') to prepare a Planning, Design and Access Statement ('PDAS') in support of a planning application to be submitted to South Holland District Council. The application requests permission for a Battery Energy Storage System (BESS) (hereafter referred to as 'the Proposed Development'). The Proposed Development is located on land ('hereafter referred to as 'The Site') within the consented Sutton Bridge Solar Farm centred on grid reference 548402, 319426.

1.2 The Planning Statement provides detailed commentary on the application site, its surroundings and any relevant planning history before providing a detailed description of the proposed development. A summary of relevant national and local planning policies and guidance is then provided before presenting an assessment of the proposal in the context of adopted planning policy and other material considerations.

1.3 The statement also includes consideration of design and access in accordance with the requirements of the Town and Country Planning (Development Management Procedure) (England) Order 2015 which stipulates that a Design and Access Statement should accompany planning applications for major development proposals. The statement explains the design principles and concepts that have been applied to the proposed development; and how issues relating to access have been dealt with.

The Applicant – Hollygreen Energyfarm Ltd / EDF Renewables

1.4 Hollygreen Energyfarm Ltd LLP is the applicant for this planning application. Hollygreen Energyfarm Ltd are a wholly owned subsidiary of the EDF Energy Renewables Limited. This application has been prepared and led by the professional team at EDF Renewables with its consultant partners.

1.5 Currently EDF has 24 separate energy projects operating across England contributing 470MW of electricity to the country's renewable energy supply. Beyond this existing supply the company has ambitious plans to deliver a further over 2.5 gigawatts (2500MW) of energy projects, including this proposed Walpole development, over the short to medium term.

1.6 EDF Renewables is one of the few companies that develops, builds, operates and maintains its renewable energy projects over their lifetime. This approach ensures that it develops long-term positive relationships with the communities and local authorities it works within. The company's projects seek to make a positive contribution both nationally in terms of the energy produced but also locally by being a good neighbour.

The Need for Battery Storage

1.7 This application will deliver energy storage capacity to support the current electricity supply grid. Battery storage is a proven, cost-effective technology that provides the system-level flexibility needed to integrate more renewable generation and future-proof the country's electricity system.

1.8 Battery storage is essential to help the UK to achieve net zero for power generation by 2035 by creating an electricity system that is clean, affordable and secure. As well as storing power generated by renewable sources, batteries improve the resilience of the electricity system. By storing energy from renewable sources, which can then be used when it's most needed, the electricity system operates more efficiently, reducing the risk of blackouts.

1.9 Battery storage solutions have four major benefits that relate to supporting the increased development of renewable energy and strengthening the existing electricity grid:

- **Allowing more renewable energy generation** - Batteries help to manage variations in renewable generation, storing surplus electricity when wind and solar power are plentiful, and releasing it when there is a shortfall.

- **Increased system resiliency** - Batteries respond rapidly to sudden changes in electricity supply and demand, acting as a 'first line of defence' to keep the energy system stable.

- **Balancing electricity supply and demand** - To keep power supplies flowing, electricity supply and demand must always be equal, or 'balanced.' Batteries are highly flexible assets which charge, or discharge as needed to ensure balance.

- **Future-proofing the electricity system** – The electricity supply of the country has changed significantly over the last 10 years with a major move away from the fossil fuel power sources to more renewable ones. It is likely as renewable energy projects and technologies continue to progress and develop and the remaining fossil fuel sources continue to be phased out that further significant changes will occur. Battery storage schemes will help to ensure that the energy system is as flexible as it needs to be to accommodate necessary changes.

1.10 The above-mentioned benefits have been recognised in multiple government reports[1] and Inspectors appeal decisions as measures that will allow the UK's energy sector to react and accommodate the rapid changes needed to tackle climate change.

1.11 One such example of a recent appeal decision is from October 2024 which relates to an application for a 90MW BESS scheme[2]. On that occasion the site was also in the Green Belt and therefore the policy context was much more restrictive in terms of what was deemed acceptable and the stringent tests the development must meet. That said, it remains very relevant in terms of the weight the Inspector gave to the benefits that the proposed BESS scheme would deliver, noting in their decision that *''With an increasing volume of renewable energy, BESS facilities have a role to play in making full and effective use of the energy produced, balancing supply and demand, and modulating the frequency of the system.''* On that particular occasion the benefits were seen to outweigh identified harm to the Green Belt which further underlines the significant weight the Inspector deemed was appropriate for said benefits.

1.12 This position has been replicated by several different Inspectors in recent months. For example, in the decision relating to a BESS scheme near Dudley[3] from July 2024, the Inspector in their assessment of the weight that should be given to the aforementioned benefits of BESS schemes stated *''As a result I give significant weight to these benefits of energy security, flexibility and the contribution to achieving net zero.''* Secondly, in the case of a BESS scheme in Staffordshire[4] from June 2024 where the Inspector noted in their assessment that *''I have regard to the Government's intentions to move away from a fossil fuels centred energy network to more low carbon and renewable energy sources. This requires an increase in not only the infrastructure to supply such energy but also to provide storage facilities to even out energy supply to meet demand more flexibly and efficiently. This proposal would provide some of that required infrastructure and therefore, in accordance with national policy, I attribute considerable weight to this.''*

1.13 It is therefore evident that Inspectors are recognising that there are clear benefits resulting from the development of BESS schemes and that this must be reflected in the planning balance when assessing such schemes.

1.14 At the recent November 2024 UN Climate Change Conference, the COP29 Global Energy Storage and Grids Pledge was launched which committed to a collective goal between the countries to deploy 1,500GW of energy storage globally by 2030 in order to support the shift to renewable energy production and tackle

[1]https://www.gov.uk/government/publications/uk-battery-strategy
[2] Appeal reference APP/Q4245/W/24/3343250 - Land off Golf Road, Wythenshawe, Manchester M33 2JT
[3] Appeal reference APP/C4615/W/24/3341383 - Lowlands Farm, Illey Lane, Halesowen B62 0HJ
[4] Appeal Ref: APP/B3438/W/23/3335922 - Land off Armshead Road, Werrington, Stoke-on-Trent

climate change. This is an ambitious target that equates to six times the global capacity in 2022. The UK Government was one of the significant backers of this pledge. National policy makers and local decision takers should continue to support proposals like the Walpole BESS scheme, in order to meet this target[5]. This global commitment highlights the vital and central role that BESS schemes must play in achieving the long-term transition to widespread renewable energy generation and usage.

1.15 The overall policy message across the interlinked sectors of climate change and energy supply is unambiguous and clear. The nation's power supply needs to move ever more towards more renewable energy supplies, whilst also ensuring that the existing grid networks can adapt to these new forms of energy generation.

1.16 BESS schemes such as the proposed Walpole site are essential to meeting those objectives and are wholly consistent with the government's aims for the energy sector and the wider economy it supports.

Application Submission

1.17 In accordance with the Council's local validation checklist, the application comprises the following submission documents which should be read in conjunction with this statement:

Table 1.1 – Application documents

Document	***Prepared by***
Application Form and Ownership Certificate	*IC Planning*
Planning, Design and Access Statement	*IC Planning*
Landscape and Visual Appraisal	*Viento Environmental Ltd*
Noise Impact Assessment	*Metrica Environmental Consulting*
Ecological Impact Assessment (EcIA)	*BSG Ecology*
Biodiversity Gain Assessment Report	*BSG Ecology*
SuDS Strategy	*Raincloud Consulting*
Flood Risk Assessment	*Raincloud Consulting*
Transport Statement Addendum	*Systra*
Heritage Impact Assessment Addendum	*Wessex Archaeology*
Battery Safety Management Plan	*Envams*
Construction Environmental Management Plan	*Envams*

[5]https://www.spglobal.com/commodityinsights/en/market-insights/latest-news/energy-transition/111524-cop29-energy-storage-and-power-grids-pledge-gets-launched-to-support-renewables-target

Agricultural Land Classification Report	*Soil Environments Ltd*
Arboricultural Report	*Arcus*
Phase 1 Land Contamination Desk Study	*Arcus*

1.18 A comprehensive package of plans and drawings prepared by EDF Renewables is also included with the application as summarised as follows:

Table 1.2 – Application Drawings

Submitted Plan	***Drawing No.***
Location Plan	*WAL-EDFR-BESS-CIV-PLN-150.02*
Site Layout Plan	*WAL-EDFR-BESS-CIV-PLN-301.03*
Block Plan	*WAL-EDFR-BESS-CIV-PLN-300.03*
Site Elevations	*WAL-EDFR-BESS-ARC-DRG-351.01*
Spares Container	*WAL-EDFR-BESS-ARC-DRG-362.01*
PCS & Transformer Arrangement	*WAL-EDFR-BESS-ARC-DRG-361.01*
Battery Container	*WAL-EDFR-BESS-ARC-DRG-360.01*
DNO Incomer Substation Arrangement	*WAL-EDFR-BESS-ARC-DRG-363.01*
Fencing, Gate and CCTV Arrangement	*WAL-EDFR-BESS-ARC-DRG-364.01*
BESS 33kV Switch Room Arrangement	*WAL-EDFR-BESS-ARC-DRG-365.01*
Auxiliary & Earthing Transformer Arrangement	*WAL-EDFR-BESS-ARC-DRG-366.02*
LV Auxiliary, Switch Room, Control Room & Welfare Unit Arrangement	*WAL-EDFR-BESS-ARC-DRG-368.01*
EV Charge Point Arrangement	*WAL-EDFR-BESS-ARC-DRG-369.01*
Water Tank Arrangement	*WAL-EDFR-BESS-ARC-DRG-371.01*
Harmonic Filter Arrangement	*WAL-EDFR-BESS-ARC-DRG-372.01*

2 Site Context

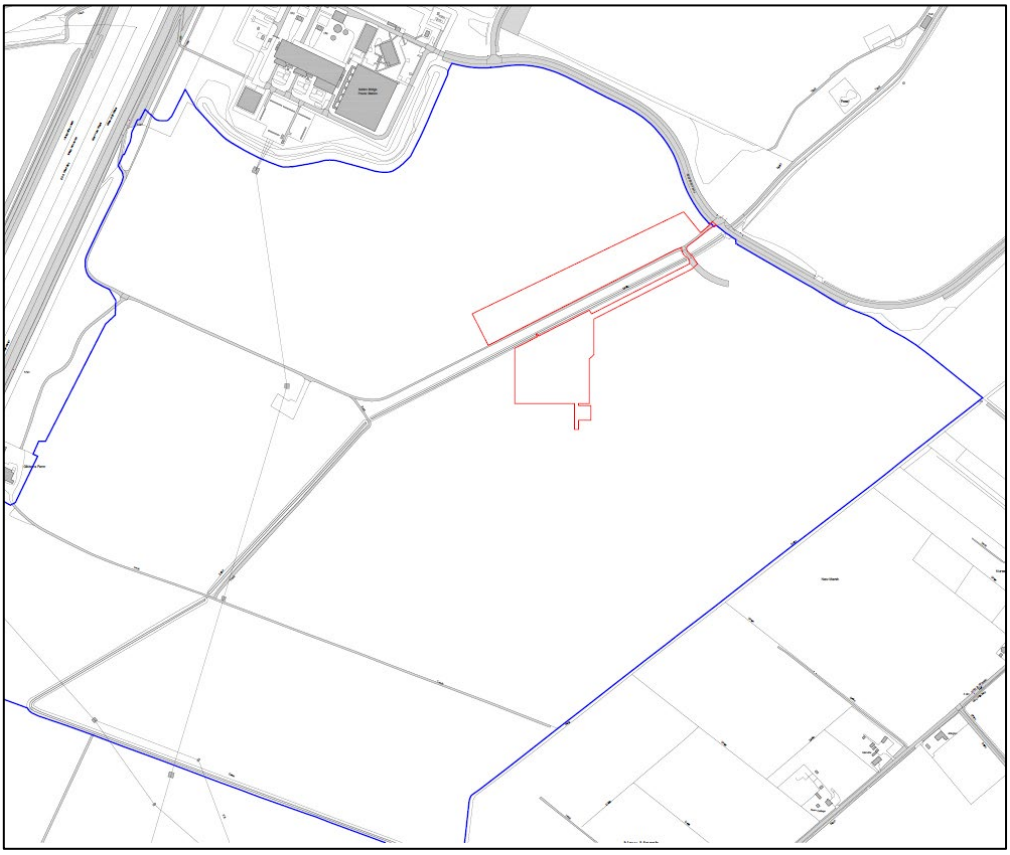
Site Description

2.1 The Site is located within the previously approved Sutton Bridge Solar Farm[6]. The Site lies to the east of the River Nene and 500m south-east of Sutton Bridge Power Station, approximately 1.25km south and east of the village of Sutton Bridge. The Site measures approximately 3.77ha and is proposed to contain the BESS, associated infrastructure and biodiversity net gain provision.

2.2 The Site will be accessed via the same point used for the solar farm, i.e. from Centenary Way, which connects to the A17 approximately 1.5km to the east.

2.3 The Site lies on flat, low-lying topography of between 2m and 4m Above Ordnance Datum (AOD). The Site is in a predominantly rural location, surrounded by the Sutton Bridge Solar Farm and exposed arable agricultural land beyond. The River Nene lies approximately 830m west of the Site. The nearest settlements to the Site are Sutton Bridge to the north, Walpole Cross Keys to the northeast and Walpole St Andrew to the southeast.

Fig. 1.1 – Location Plan (not to scale)



[6] Application reference H18-1126-20

Designations

2.4 There are no statutory or non-statutory designations within the Site or the immediate surrounding area. The Site is within Flood Zones 3a and 2 according to the Environment Agency Flood Map for Planning. Consequently, a Flood Risk Assessment has been undertaken and is submitted as part of this application. This issue is also assessed in greater detail in section 5 of this report.

2.5 There are no designated heritage assets on the Site or in the immediate locality. The nearest are a collection of listed buildings and structures which are between approximately 1.4km and 1.5km to the north west of the Site which comprise the grade II* listed Cross Keys Bridge, the grade II* listed associated hydraulic engine house, and a grade II listed telephone kiosk.

Access

2.6 The Site is accessed via a short track that runs off Centenary Way, the road that serves the adjacent power station which leads directly onto the A17 approximately 1.6km to the north east of the Site. This is also the primary site access for Sutton Bridge Solar Farm, which is now operational, of which the Site in question on this occasion is a part.

Planning History

2.7 As alluded to above, the Site lies within the operational Sutton Bridge Solar Park site. This was granted permission in March 2021 (South Holland Planning ref: H18-1126-20) and is now operational. It covers an area surrounding the Site which equates to approximately 118ha. The Proposed Development is by the same applicant and forms part of this wider project.

2.8 The solar farm consent (ref: H18-1126-20) has been subject to a Non-Material Amendment (NMA) application under the Section 96A of the Town and Country Planning Act 1990 (ref: H18-0984-24). The NMA gained approval to remove a small area that was included within the biodiversity net gain (BNG) calculations for the solar scheme so that it could be reassigned to the proposed BESS scheme. This approach has allowed the proposed BESS scheme to deliver a 12.33% BNG whilst also allowing the solar scheme to still deliver an approximate 191% BNG.

2.9 An EIA Screening Request was also submitted to South Holland District Council with a response received on the 15 March 2024 (LPA ref: PE-00042-24) which confirmed that the Council consider the development to be non-EIA development.

Pre-application Public Consultation

2.10 The applicant undertook a comprehensive public consultation exercise prior to the submission of the application for Sutton Bridge Solar Farm, of which the proposed BESS scheme will be a part. Prior to the submission of this application for the BESS scheme, an update letter was sent to stakeholders on the 28th May 2024, including local residents who previously engaged with the consultations on the Sutton Bridge Solar Farm scheme, informing them of the latest development in the project and the planned submission of this application. However, only one response was received which was relating to the community fund from the solar farm. Consequently, it was not deemed necessary to undertake any further consultation specifically in relation to the BESS application.

3 Proposed Development

Application Proposal

3.1 The Proposed Development is for a BESS with associated infrastructure and equipment including fencing, security cameras, cabling and access tracks, SuDS and biodiversity net gain provisions.

3.2 Construction of the Proposed Development is expected to be completed within approximately 9-12 months, any effects arising from this would be short term and temporary. The Development has an operational lifespan of 40 years. The Proposed Development is temporary and reversible, at the end of the operational period, the Proposed Development would be decommissioned in accordance with best practice at that time.

3.3 Areas of new hardstanding withing the BESS compound will be limited to the foundations underneath the buildings, containers, transformers and other electrical installations and access tracks. The access track will be lined with type 2 aggregate.

3.4 The Development would consist of the following:

- The BESS compound would include up to 48 battery storage containers and up to 13 PCS/MVS units.

3.5 The BESS containers would measure approximately 12.0 m x 3.9 m (H) x 3.1 m to existing ground level.

3.6 A control room measuring approximately 3.4 m (H) x 3.2 m x 6.2 m which will be located in the BESS compound.

3.7 An LV substation measuring approximately 3.4 m (H) x3.2 m x 6.2 m which will be located in the BESS compound.

- A BESS switch room measuring approximately 3.4 m (H) x 3.2 m x 18 m which will be located in the BESS compound.

- A spares container measuring approximately 3 m (H) x 2.5 m x 12.2 m which will be located in the BESS compound.

- A welfare cabin measuring approximately 3.4 m (H) x 3.2 m x 6.2 m which will be located in the BESS compound.

3.8 PCS (Power Conversion Systems) or MVS (Medium Voltage Skid) measuring approximately 3.2 m (H) x 10 m x 3.0 m will be located in the compound.

- DNO substation 3.2 m (H) x 5 m x 5 m will be in the compound.
- Harmonic filter measuring 3.2 m (H) x 17 m x 7 m will be in the compound.
- One of each Auxiliary and Earthing transformer are present on site measuring 3.2 m (H) x 4 m x 3.5 m.

3.9 Palisade fencing type around the BESS compound measuring 3 m high with an acoustic fence measuring 3.5m high installed as needed.

- CCTV cameras located on 4.2 m high poles.
- A water tank with 230m3 capacity will be located in proximity to the substation/BESS compound.
- Access roads will be 4m wide, constructed with porous aggregate.
- A temporary construction compound would be installed for the construction phase, located at the entrance of the solar site. Towards the end of the construction phase, the temporary construction compound would be removed and repurposed back as an office building for the solar farm.

3.10 The application is supported by a full suite of architectural and planning drawings prepared by the Applicant which present the development proposals in detail, including the various equipment outlined above.

Equipment

3.11 The main component of the BESS scheme will be the battery units which are kept in purpose-built battery storage containers. These will be organised in rows in the centre of the Site. These are flat roofed structures that come in pairs.

3.12 Each battery will feed into a transformer and Power Conversion System (PCS) which would convert the supply between the Direct Current (DC) from the battery and alternating current (AC) from the National Grid and the transformer would step-up or step-down the voltage of the supply as required for transmission/storage.

3.13 To support and manage the electrical flows to and from the Site from the National Grid there will be a 33kV switchgear.

Infrastructure

3.14 There will also be a self-contained site welfare facility which will be used by staff visiting the Site. As the Proposed Development would not be permanently manned, although site maintenance would be

undertaken periodically, there is no requirement for foul drainage and wastewater will be periodically pumped out and disposed of offsite.

3.15 New surface water drainage infrastructure is proposed as part of the Proposed Development. Full details are set out in the accompanying Drainage Strategy prepared by Raincloud Consulting but to summarise, surface water will discharge to the existing ditch to the north via a new detention basin within the Site.

Security

3.9 Once operational the BESS would be unmanned but monitored by CCTV cameras. The main battery storage compound would be enclosed mainly by 3.5m high acoustic fencing.

3.10 Lighting on the Site would be kept to a minimum to help both reduce light pollution and running costs. The Site will not be permanently lit and on the infrequent times that staff are attending the site when it is dark, lighting will be controlled by motion sensors.

Construction

3.11 The overall constriction period is anticipated to take 9-12 months.

4 Planning Policy Context

Decision Taking

4.1 Section 70(2) of the Town and Country Planning Act 1990 states that where an application is made to a local planning authority for planning permission, the authority shall have regard to the provisions of the development plan, so far as material to the application. In March 2019 South Holland District Council adopted a joint Local Plan along with Boston Borough Council and Lincolnshire County Council - the South East Lincolnshire Local Plan ('SELLP').

4.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the statutory development plan unless material considerations indicate otherwise. The National Planning Policy Framework 2023 ('NPPF') and any relevant Supplementary Planning Documents (SPDs) are a material consideration. At the time of writing, South Holland DC has six adopted SPDs however none of them are directly relevant to the Proposed Development.

National Planning Policy Framework – December 2024

4.3 In December 2024 the Government published an updated version of the NPPF. The NPPF sets out the Government's overarching policy framework for planning and is a material consideration in the determination of applications. The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development.

4.4 To achieve sustainable development, the NPPF states that economic, social and environmental gains should be sought jointly and simultaneously through the planning system. Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life.

4.5 Paragraph 11 of the NPPF sets out a 'presumption in favour of sustainable development', which for decision-taking means *"approving development proposals that accord with an up-to-date development plan without delay; or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless: any adverse impacts of doing so would significantly and demonstrably outweigh the benefits…"*

4.6 Paragraph 38 of the NPPF is clear that *"Local planning authorities should approach decisions on proposed development in a positive and creative way".* In accordance with the presumption in favour of sustainable development, LPAs should *"work proactively with applicants to secure developments that will improve the*

economic, social and environmental conditions of the area… Decision-makers at every level should seek to approve applications for sustainable development where possible".

4.7 As stated in Section 1 of this submission, the Proposed Development is needed to support the National Grid in managing the fluctuations which naturally occur as part of the generation of renewable energy. BESS projects such as the Proposed Development will allow the more widespread use of renewable energy, removing those fluctuations in supply and providing a system that can in turn use that green energy as and when its needed. The proposed development is wholly consistent with the aims of achieving sustainable development.

4.8 Paragraph 161 of the NPPF sets out that *"The planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure."* This is in line with the aims of the Proposed Development, the approach is consistent with the NPPF's overall aims of achieving sustainable development.

4.9 Paragraph 168 of the NPPF goes on to state that when determining planning applications for *''all forms of renewable and low carbon energy development and their associated infrastructure''* local planning authorities should *''not require applicants to demonstrate the overall need for renewable or low carbon energy, and give significant weight to the benefits associated with renewable and low carbon energy generation and the proposal's contribution to a net zero future.''*

4.10 Paragraph 187 of the NPPF sets out that *"planning policies and decisions should contribute to and enhance the natural and local environment by… protecting and enhancing valued landscapes… recognising the intrinsic character and beauty of the countryside."*

4.11 Overall, the developments proposals are consistent with the aims and objectives of the NPPF set out above.

Overarching National Policy Statement for Energy (EN-1) (November 2023)

4.12 This National Policy Statement (NPS) sets out national policy for the energy infrastructure and may be a material consideration in making decisions on planning applications under the 1990 Town and Country Planning Act.

4.13 Section 2 of this document sets out the importance of the production of energy and getting it to where it is needed on both a local and national scale.

4.14 Section 2.3 of the NPS addresses the UK's aim for reaching net zero. Stating that the objectives for energy systems are to ensure the supply of energy always remains secure, reliable, affordable, and consistent with meeting targets to cut greenhouse gas emissions to be net zero by 2050.

4.15 EN-1 paragraph 3.3.4 further highlights the need for electricity storage to be part of the electricity infrastructure that comes forward, stating *''There are several different types of electricity infrastructure that are needed to deliver our energy objectives. Additional generating plants, electricity storage, interconnectors and electricity networks all have a role, but none of them will enable us to meet these objectives in isolation.''*

4.16 It goes on at paragraph 3.3.6 to further reiterate the benefits that energy storage schemes can deliver, stating *''Storage and interconnection can provide flexibility, meaning that less of the output of plant is wasted as it can either be stored or exported when there is excess production. They can also supply electricity when domestic demand is higher than generation, supporting security of supply. This means that the total amount of generating plant capacity required to meet peak demand is reduced, bringing significant system savings alongside demand side response (up to £12bn per year by 2050).''*

UK Battery Storage (November 2023)

4.17 The Department for Business and Trade have published this report which sets out the aims and objectives for the future of Batteries and Energy within the UK. The vision being that by 2030 the UK will have a globally competitive battery supply chain that supports economic prosperity and the net zero transition.

4.18 The document states that *"Batteries will enable us to use energy in a more flexible way that supports decarbonisation goals by helping to balance the system, maximise the usable output from renewable energy, and avoid the need for new generation capacity."* Both The Faraday Institution and BloombergNEF estimate that BESS could provide 10-20GW of capacity to the UK grid by 2030, and 30-50GW by 2050.

Planning Practice Guidance

Renewable and Low Carbon Energy – August 2023 update

4.19 The PPG contains up to date advice on how BESS projects should be assessed. The guidance acknowledges the electricity storage can enable the country to use energy more flexibly and de-carbonise our energy system cost-effectively – for example, by helping to balance the system at lower cost, maximising the usable output from intermittent low carbon generation (e.g. solar and wind), and deferring or avoiding the need for costly network upgrades and new generation capacity.

Climate Change - 2019

4.20 This PPG, which addresses climate change, is one of the core land use planning principles which the NPPF expects to underpin both plan-making and decision-taking. The guidance sets out that local authorities should adopt proactive strategies to mitigate and adapt to climate change, in accordance with Climate Change Act 2008 with its target to reduce greenhouse gas emissions.

4.21 The guidance also sets out that local authorities can use strategies within their local plans to mitigate climate change for example by providing opportunities for renewable and low carbon energy technologies.

Clean Power 2030 Action Plan (December 2024)

4.22 In December 2024 the Government published the 'Clean Power 2030 Action Plan: A new era of clean electricity' which outlines how the Governments target of ensuring that by 2030, Great Britain will produce at least as much power as it consumes in total over the year through clean energy sources in order to drastically reduce fossil fuel dependency in the strive for reaching net zero by 2050.

4.23 In the action plan it is stated that to do so, the country will require, alongside the energy generation infrastructure, 23-27 GW of battery capacity for energy storage to improve the flexibility of the electricity system. It pledges a ''once-in-a-generation'' energy investment to achieve this, alongside planning reforms to facilitate what it calls ''2030 critical projects'', including battery storage schemes.

4.24 This latest publication further underlines the step change in direct Government action to ensure that the means are in place to implement proposals for development such as that put forward in this instance as a result of their importance in meeting national targets.

South and East Lincolnshire Councils Partnership Net Zero Targets

4.25 In March 2022, South Holland District Council as part of the South and East Lincolnshire Councils Partnership along with East Lindsey District Council and Boston Borough Council adopted a joint Climate Change Strategy. This sets out their collective commitment to tackle climate change and sets out that they are aiming to meet the target of being net zero by 2040, ahead of the national target. It goes on to recognise that renewable energy generation will be central to meeting this net zero target and it will be vital that the region allows innovation to future-proof the energy distribution network in the area.

The Development Plan

4.26 The development plan is the starting point for considering planning applications. As set out above, the development plan on this occasion is made up of the South East Lincolnshire Local Plan ('SELLP'). A list of the relevant policies from the Local Plan and commentary on how this proposal complies with those policies is set out in Table 4.1 below.

Table 4.1 – SELLP policies

Policy Reference	***Policy Extract and Commentary***
Policy 1	*D. Countryside* *The rest of the Local Plan area outside the defined settlement boundaries of the Sub-Regional Centres, Main Service Centres, Minor Service Centre and Other Service Centres and Settlements is designated as Countryside.* *In the Countryside development will be permitted that is necessary to such a location and/or where it can be demonstrated that it meets the sustainable development needs of the area in terms of economic, community or environmental benefits.*
	This Proposed Development is in the open countryside in policy terms but there is a locational requirement for it to be sited adjacent to Sutton Bridge Solar Farm as it will work in conjunction with this infrastructure. Consequently, the open countryside is necessary on this occasion.
Policy 2	*Proposals requiring planning permission for development will be permitted provided that sustainable development considerations are met, specifically in relation to:* *1. size, scale, layout, density and impact on the amenity, trees, character and appearance of the area and the relationship to existing development and land uses;* *2. quality of design and orientation;* *3. maximising the use of sustainable materials and resources;* *4. access and vehicle generation levels;* *5. the capacity of existing community services and infrastructure;* *6. impact upon neighbouring land uses by reason of noise, odour, disturbance or visual intrusion;* *7. sustainable drainage and flood risk;* *8. impact or enhancement for areas of natural habitats and historical buildings and heritage assets; and* *9. impact on the potential loss of sand and gravel mineral resources*
	The Proposed Development is restricted in terms of changes that can be made to the design of the infrastructure as it is designed to maximise functionality. However, the layout and siting of the infrastructure within the Site has been informed in part by the

	impact on the surrounding area and minimising this. All other relevant matters outlined above such as flood risk, ecology and heritage are addressed in the Flood Risk Assessment (see Appendix 5), EcIA (see Appendix 4) and Heritage Impact Assessment (see Appendix 6).
Policy 3	*Development proposals will demonstrate how the following issues, where they are relevant to the proposal, will be secured:* *1. creating a sense of place by complementing and enhancing designated and non designated heritage assets; historic street patterns; respecting the density, scale, visual closure, landmarks, views, massing of neighbouring buildings and the surrounding area;* *2. distinguishing between private and public space;* *3. the landscape character of the location;* *4. accessibility by a choice of travel modes including the provision of public transport, public rights of way and cycle ways;* *5. the provision of facilities for the storage of refuse/recycling bins, storage and/or parking of bicycles and layout of car parking;* *6. the lighting of public places;* *7. ensuring public spaces are accessible to all;* *8. crime prevention and community safety;* *9. the orientation of buildings on the site to enable the best use of decentralised and renewable low-carbon energy technologies for the lifetime of the development;* *10.the appropriate treatment of facades to public places, including shop frontages to avoid visual intrusion by advertising, other signage, security shutters, meter boxes and other service and communication infrastructure;* *11.residential amenity;* *12.the mitigation of flood risk through flood-resistant and flood-resilient design and sustainable drainage systems (SuDS);* *13.the use of locally sourced building materials, minimising the use of water and minimising land take, to protect best and most versatile soils;* *14.the incorporation of existing hedgerows and trees and the provision of appropriate new landscaping to enhance biodiversity, green infrastructure, flood risk mitigation and urban cooling;* *15.the appropriate use or reuse of historic buildings.*

	As a development comprising electrical infrastructure, the vast majority of the requirements outlined above are not relevant to the Proposed Development. Nevertheless, issues such as the impact on landscape character, protecting residential amenity and flood risk mitigation have all been subject to professionally prepared technical assessments which have informed mitigation to make the proposal acceptable in respect of these issues and the demonstrated the development would not cause harm.
Policy 4	*Development proposed within an area at risk of flooding (Flood Zones 2 and 3 of the Environment Agency's flood map or at risk during a breach or overtopping scenario as shown on the flood hazard and depths maps in the Strategic Flood Risk Assessment) will be permitted, where:* *1. It can be demonstrated that there are no other sites available at a lower risk of flooding (i.e. that the sequential test is passed). The sequential test will be based on a Borough or District wide search area of alternative sites within the defined settlement boundaries, unless local circumstances relating to the catchment area for the development justify a reduced search area, i.e. there is a specific need for the development in that location. The sequential test is not required for sites allocated in the Local Plan, minor development or change of use (except for a change of use to a caravan, camping or chalet site, or to a mobile home or park home site).* *2. It can be demonstrated that essential infrastructure in FZ3a & FZ3b, highly vulnerable development in FZ2 and more vulnerable development in FZ3 provide wider sustainability benefits to the community that outweigh flood risk.* *3. The application is supported with a site-specific flood risk assessment, covering risk from all sources of flooding including the impacts of climate change and which:* *a. demonstrate that the vulnerability of the proposed use is compatible with the flood zone;* *b. identify the relevant predicted flood risk (breach/overtopping) level, and mitigation measures that demonstrate how the development will be made safe and that occupants will be protected from flooding from any source;* *c. propose appropriate flood resistance and resilience measures (following the guidance outlined in the Strategic Flood Risk Assessment), maximising the use of passive resistance measures (measures that do not require human intervention to be*

	deployed), to ensure the development maintains an appropriate level of safety for its lifetime; *d. include appropriate flood warning and evacuation procedures where necessary (referring to the County's evacuation routes plan), which have been undertaken in consultation with the authority's emergency planning staff;* *e. incorporates the use of Sustainable Drainage Systems (SuDS) (unless it is demonstrated that this is not technically feasible) and confirms how these will be maintained/managed for the lifetime of development (surface water connections to the public sewerage network will only be permitted in exceptional circumstances where it is demonstrated that there are no feasible alternatives);* *f. demonstrates that the proposal will not increase risk elsewhere and that opportunities through layout, form of development and green infrastructure have been considered as a way of providing flood betterment and reducing flood risk overall;* *g. demonstrates that adequate foul water treatment and disposal already exists or can be provided in time to serve the development;* *h. ensures suitable access is safeguarded for the maintenance of water resources, drainage and flood risk management infrastructure.*
	The Site is in Flood Zones 3a and 2 and consequently a site specific Flood Risk Assessment has been submitted which sets out how the Proposed Development will be made safe from all relevant sources of flood risk around the Site. Furthermore, as there is an operational requirement for the BESS scheme to be sited as part of the wider Sutton Bridge Solar Park, there are no other available sites in Flood Zone 1 and therefore the sequential test has been applied and passed. The drainage has been informed by the SuDS Drainage Hierarchy which is set out in the accompanying SuDS Strategy (see Appendix 10).
Policy 28	*A high quality, comprehensive ecological network of interconnected designated sites, sites of nature conservation importance and wildlife-friendly greenspace will be achieved by protecting, enhancing and managing natural assets:* *Nationally or locally-designated sites and protected or priority habitats and species:* *a. development proposals that would directly or indirectly adversely affect these assets will not be permitted unless: i. there are no alternative sites that would cause*

	less or no harm; and ii. the benefits of the development at the proposed site, clearly outweigh the adverse impacts on the features of the site and the wider network of natural habitats; and iii. suitable prevention, mitigation and compensation measures are provided.
	A net gain in habitat units will be provided across the site full details of which are set out in the accompanying BNG Assessment (see Appendix 4).
Policy 29	*C. Archaeology and Scheduled Monuments* *1. Proposals that affect archaeological remains, whether known or potential, designated or non-designated, should take every reasonable step to protect and, where possible, enhance their significance.* *2. Planning applications for such development should be accompanied by an appropriate and proportionate assessment to understand the potential for and significance of remains, and the impact of development upon them.* *3. If initial assessment does not provide sufficient information, developers will be required to undertake field evaluation in advance of determination of the application. This may include a range of techniques for both intrusive and non-intrusive evaluation, as appropriate to the site.* *4. Wherever possible and appropriate, mitigation strategies should ensure the preservation of archaeological remains in-situ. Where this is either not possible or not desirable, provision must be made for preservation by record according to an agreed written scheme of investigation submitted by the developer, undertaken by a suitably qualified person, and approved by the Local Planning Authority.* *5. Any work undertaken as part of the planning process must be appropriately archived in a way agreed with the Local Planning Authority.*
	A Heritage Impact Assessment has been undertaken which concludes that based on all available information it is unlikely the Site contains anything that is more than of local significance. Consequently, the impact on archaeological potential will be acceptable and can be mitigated as necessary.

Policy 30	*Development proposals will not be permitted where, taking account of any proposed mitigation measures, they would lead to unacceptable adverse impacts upon:* *1. health and safety of the public;* *2. the amenities of the area; or* *3. the natural, historic and built environment; by way of:* *4. air quality, including fumes and odour;* *5. noise including vibration;* *6. light levels;* *7. land quality and condition; or* *8. surface and groundwater quality.*
	The Battery Safety Management Plan (Appendix 3) outlines in depth why fire risk is very low but will be managed to ensure it can be addressed in the highly unlikely event of a fire. Furthermore, the Site will be bound by fencing and monitored by CCTV cameras as part of the wider Sutton Bridge Solar Farm. Both of these measures ensure the health and safety of the public is maintained. The Proposed Development will not have a material impact on existing background noise levels as outlined in the Noise Impact Assessment (see Appendix 8).
Policy 31	*With the exception of Wind Energy the development of renewable energy facilities, associated infrastructure and the integration of decentralised technologies on existing or proposed structures will be permitted provided, individually, or cumulatively, there would be no significant harm to:* *1. visual amenity, landscape character or quality, or skyscape considerations;* *2. residential amenity in respect of: noise, fumes, odour, vibration, shadow flicker, sunlight reflection, broadcast interference, traffic;* *3. highway safety (including public rights of way);* *4. agricultural land take;* *5. aviation and radar safety;* *6. heritage assets including their setting; and* *7. the natural environment.*

The Proposed Development is part of a wider renewable energy scheme. It will be acceptable in terms of all material considerations outlined above for the reasons set out in section 5 of this PDAS and the various technical assessments submitted with the application.

5 Planning Assessment

Determining Issues

5.1 Taking into account the characteristic of the application site, the nature of the Proposed Development and the planning policy context, it is considered that the key issues to be assessed in the determination of this planning application are as follows:

- Principle of the development;
- Landscape and visual impact;
- Residential amenity;
- Cumulative impact;
- Ecology and biodiversity;
- Flood risk and drainage;
- Access and highway safety;
- Heritage and Archaeology;
- Health and safety; and
- Provision of best and most versatile agricultural land.

Principle of Development

5.2 As set out in section 1, BESS schemes play a vital role in ensuring that the country's renewable energy infrastructure is able to supply energy to the National Grid all year round and on occasions where the lack of sunlight makes generating new additional energy difficult. This will be key in reaching the ambitious Net Zero targets, both nationally and locally, by helping to provide an efficient and sustainable renewable energy supply.

5.3 On this particular occasion, the BESS is proposed to support the wider Sutton Bridge Solar Farm which was granted permission by South Holland DC in 2021 and is now operational. Policy 31 of the SELLP states that ''the development of renewable energy facilities, associated infrastructure and the integration of decentralised technologies…will be permitted'' (emphasis added) subject to it causing no significant environmental harm or in respect of all other material considerations. The Proposed Development constitutes ''associated infrastructure'' related to Sutton Bridge Solar Farm and will actually improve said scheme insofar as its efficiency and sustainability.

5.4 It is acknowledged that the Site is within the open countryside in policy terms and consequently policy 1 of the SELLP dictates that development in such locations is only permissible when it ''is necessary to such a location and/or where it can be demonstrated that it meets the sustainable development needs of the area in terms of economic, community or environmental benefits.'' In this case there is a clear operational requirement for the BESS infrastructure to be within Sutton Bridge Solar Farm so that it can be connected to this infrastructure. Furthermore, as already set out, it will also have clear environmental benefits by improving the efficiency of the solar farm. Consequently, the open countryside location does not preclude the Proposed Development, and it still complies with policy 1 of the SELLP.

5.5 Based on the above, it is considered that the Proposed Development is supported in principle by policy 31 of the Local Plan subject to it being demonstrated no significant harm will arise in respect of other material considerations. This will be shown in the following sections.

Landscape and Visual Impact

5.6 Policy 2 of the SELLP sets out general requirements for development, one of which being ensuring that it has an acceptable impact on the character and appearance of the surrounding area. Furthermore, policy 3 relates specifically to design and requires proposals to demonstrate how an acceptable impact on the landscape character of the location will be secured.

5.7 The landscape impact of the wider Sutton Bridge Solar Farm was assessed in detail through the previously approved application for that development. Given the BESS and associated infrastructure will sit within this wider solar development and is small in scale relative to what has already been approved, it will not materially change the overall landscape impact.

5.8 Nevertheless, to fully demonstrate this, a Landscape Visual Appraisal (LVA) has been submitted as part of this application (see Appendix 7). This provides an assessment of the impact of the Proposed Development when viewed from four different viewpoints within the Zone of Theoretical Visibility, namely a local road to the south of Sutton Bridge approximately 700m west of the west, King John Bank approximately 800m south east of the Site, Centenary Way 1.1km north east of the Site and Gunthorpe Road 1.4km south of the Site. All of the viewpoints were also used in the LVA for the assessment of the Sutton Bridge Solar Farm development.

5.9 The LVA concludes that from all of the viewpoints, the Proposed Development would either be imperceptible due to existing screening and landscaping or represent a negligible change owing to it being viewed as part of the wider existing Sutton Bridge Solar Farm. Furthermore, it outlines that *''The very flat topography of the site and study area combined with the existing solar farm and vegetation surrounding the site and the low*

elevation of the proposal would result in a proposed development that is very well screened. The operational solar farm surrounds the proposal on all sides, creating an area of already developed character to which the BESS proposal would be added. The elements within the solar farm are of a similar height and colour to those within the BESS proposal such that the position of the BESS proposal centrally within the existing solar farm would result in very limited changes to landscape character and visual amenity, especially across such a flat terrain.''

5.10 Based on this assessment it is considered that the landscape impact of the development will be negligible and certainly not equate to harm. Consequently, the Proposed Development complies with the requirements of policies 2 and 3 of the Local Plan.

Residential Amenity

5.11 Policy 30 of the SELLP relates to pollution and prevents development which would have an adverse impact upon the health and safety of the public and general amenities of the area by way of, amongst other things, noise and vibration and air quality. In this respect, BESS schemes give off low levels of noise at certain times which could have potential to impact the amenity of the surrounding area.

5.12 To assess this issue fully, a Noise Impact Assessment has been undertaken by Metrica Environmental Consulting (see Appendix 8). This has been submitted as part of the planning application but to summarise, baseline noise levels were surveyed and using data relating to the noise output from the proposed equipment, it has shown that the Proposed Development on the most part led to no discernible increase in noise levels at surrounding receptors and when there is an increase in background noise resulting from the equipment, this will be below the 5dB levels at which guidance states it would begin to have an adverse impact.

5.13 Nevertheless, the Proposed Development includes mitigation measures such as 3.5m high acoustic fencing around the noise generating equipment. This will further reduce the general impact of the development on the amenity of the area.

5.14 On this basis it is considered that the Proposed Development will be inconsequential to the living conditions of surrounding residents and the general amenity of the area, and it therefore complies with the requirements of policy 30.

Cumulative Impact

5.15 In the context of both landscape impact and noise generation it is important to recognise the potential for a cumulative impact to result from the Proposed Development alongside any other existing or proposed

projects in the surrounding area. In this respect, the only potential development that could have a cumulative impact alongside the proposal is the operational Sutton Bridge Solar Farm that surrounds the site.

5.16 However, as set out in the 'Landscape and Visual Impact' section above, the LVA takes this into account and concludes that owing to the BESS scheme being within the solar farm, it will appear more so as part of this wider development than something alongside it and given it will be generally imperceptible in this context, the overall landscape and visual impact will be negligible and not equate to harm.

5.17 In terms of the Noise Impact Assessment, this does not consider cumulative impact owing to the noise that will be generated from the existing Sutton Bridge Solar Farm and associated infrastructure being so low that it does not create any additional background noise. Indeed, the Case Officer for the Sutton Bridge Solar Farm planning application noted in their report *''Solar development does not typically generation [sic] a significant amount of noise or vibration outside of the construction period.''* As a result, it is considered that will be no cumulative noise impact from the solar farm and BESS schemes.

Ecology and Biodiversity

5.18 Policy 28 of the SELLP relates to the natural environment and requires development to protect designated sites and protected or priority habitats and species. The Site is not subject to any specific ecological designations and there are no such designations within close proximity to the Site that the Proposed Development could impact.

5.19 An Ecological Impact Assessment ('EcIA') has been undertaken to ascertain the potential impact on protected habitats and species on site and in the surrounding area (see Appendix 4). This report should be read in conjunction with this PDAS but to summarise, it sets out that with mitigation measures implemented mainly during the construction phase of the development, the impact on protected species will be acceptable. These measures will be controlled through a Construction Environmental Management Plan (Appendix 9) that will remain in place during the construction phase. On this basis, the requirements of policy 28 are met.

5.20 Since the adoption of the SELLP, the Environment Act 2021 has become law. This now requires the vast majority of proposals to demonstrate at least a 10% net gain in biodiversity units across the Site post-development. As mentioned above, there is currently an ongoing application for Non-Material Amendment (NMA) application under the Section 96A of the Town and Country Planning Act 1990 (ref: H18-0984-24). The NMA seeks to remove a small area that is included within the biodiversity net gain (BNG) calculations for the Sutton Bridge Solar Farm so that it can be reassigned to the Proposed Development. This approach

allows the Proposed Development to deliver a 12.33% net gain in biodiversity whilst allowing the Sutton Bridge to still deliver an approximate 191% BNG.

5.21 A BNG Assessment has been undertaken which includes a pre-development baseline assessment using the DEFRA BNG Metric (see Appendix 4). As per the Planning Practice Guidance[7], a Biodiversity Gain Plan will be submitted pre-commencement which confirms the exact net gain that will be secured through the development proposals. However, the initial assessment undertaken and submitted as part of the application confirms that the requisite net gain is achievable through the reassignment of some of the Sutton Bridge Solar Farm site as explained above. On this basis, the requirements of the Environment Act are met.

Flood Risk and Drainage

5.22 Policy 4 of the SELLP relates to managing flood risk and effectively echoes the NPPF's requirements relating to the sequential and exception tests for development in flood zones 2 and 3. It is pertinent to note that the NPPF classifies the Proposed Development as essential infrastructure and it is therefore compatible with Flood Zone 3a. Notwithstanding, it is accepted the relevant policy tests still apply.

5.23 The sequential test is a matter for the Local Planning Authority to assess and effectively requires it to be demonstrated that there are no other available sites that could be used for the Proposed Development that are at a lesser risk of flooding. On this particular occasion there is a clear operational requirement for the Proposed Development to be sited in this location as it works alongside the existing operational Sutton Bridge Solar Farm and will be connected to this infrastructure. Furthermore, as outlined above, the particular location within the Site also minimises landscape impact as it ensures the BESS will be screened to a large extent and seen as part of the wider Sutton Bridge Solar Farm when it is visible. On this basis it is considered that there are no other available sites at a lesser risk of flooding and the sequential test is passed for the Proposed Development.

5.24 The second requirement in terms of flood risk is for it to be demonstrated that the development is safe from all sources of flooding and will not increase the risk of flooding elsewhere, i.e. the exception test. To this end, a site-specific Flood Risk Assessment (FRA) has been submitted as part of the application (see Appendix 5). During the preparation of the FRA, the Applicants Drainage Consultant, Raincloud, met with the Environment Agency to discuss and agree appropriate measures of mitigation and consulted them throughout to ensure correct data was informing the assessments. The Site already benefits from Environment Agency-maintained flood embankments on the nearby River Nene which protects against tidal flooding. The FRA sets out that this would keep the Proposed Development safe from any tidal flooding from

[7] https://www.gov.uk/guidance/biodiversity-net-gain#determination-of-the-biodiversity-gain-plan

the river for the lifetime of the development, paying heed to the relevant flood levels. Nevertheless, a protection bund will also be included around the BESS infrastructure which will protect the Site in the event of the aforementioned defences being breached. On this basis, it has been demonstrated that the Proposed Development will remain safe from flood risk and not increase the risk of flooding elsewhere.

5.25 Consequently, it is considered that the Proposed Development passes both the sequential test and the exception test and is therefore complies with policy 4 of the SELLP and is acceptable on flood risk grounds.

5.26 Policies 2 and 3 along with policy 4 of the Local Plan requires opportunities for the use of sustainable drainage to be maximised and the design of development to incorporate such features unless it can be demonstrated that this isn't technically feasible. A SuDS Strategy has therefore been produced by Raincloud Consulting which sets out full details of infiltration testing undertaken on the site to inform whether this could be used as the main drainage option which ultimately returned negative results. Consequently, it is proposed that surface water will be discharged to a ditch approximately 40m to the north of the Site that ultimately runs into the River Nene. This is in line with the SuDS Hierarchy and represents the second most favourable method of surface water drainage.

5.27 A containment system which utilises an attenuation pond will be installed within the site and is shown on the proposed Site Plan (drawing no.: WAL-EDFR-BESS-CIV-PLN-301.04). This will control discharge into the ditch to suitable levels. Full drainage calculations are set out in detail in the SuDS Strategy that has been submitted with this application.

5.28 It is also important to note that the attenuation system has been designed to be able to hold all the water needed in the event of a fire which will drain into the system as surface water. The system can then be shut off to avoid discharge into the hydrological network until it has been tested and treated as necessary in the event of contamination.

5.29 As a result of the above, it is considered that a sustainable method of surface water drainage has been incorporated into the scheme which meets the requirements of policies 2, 3 and 4 of the SELLP.

Access and Highway Safety

5.30 Policy 2 of the SELLP sets out that development must also show how access and vehicle generation levels have been assessed and will be safely dealt with as part of the Proposed Development.

5.31 As already set out, the Proposed Development sits as part of the much larger Sutton Bridge Solar Farm which is now operational. The BESS scheme will utilise the same access from Centenary Way that serves this solar farm, both during construction and operational phases of the Proposed Development. The adequacy of this

access was assessed in great detail as part of the planning application for the now operational Sutton Bridge Solar Farm and the Proposed Development is considered to not materially change this assessment. Nevertheless, an addendum to the Transport Statement has been submitted as part of this application (see Appendix 11) which includes updated swept path analysis drawings that confirm the access is suitable to serve the Proposed Development during construction and moving forward.

5.32 Furthermore, the Transport Statement also includes information on expected trip generation during the 9–12-month construction period for the Proposed Development. This concludes that these additional movements will be minimal and will not compromise highway safety on the surrounding road network.

5.33 The Transport Statement Addendum also includes a Construction Traffic Management Plan (CTMP) which outlines measures which will further mitigate any minimal impact on the road network including wheel cleaning facilities, staff inductions and Code of Conducts, delivery controls, and recycling of materials found on site such as top soil and stone in order to minimise volume of imported and exported materials. This CTMP will be implemented in full which can be controlled by the condition should the Local Planning Authority deem this necessary.

5.34 Based on the above it is considered that the impact of the Proposed Development on highway safety will be acceptable.

Heritage and Archaeology

5.35 Policy 29 of the SELLP sets out the requirement for all development to protect the significance of heritage assets and the historic environment, including archaeological potential. As set out in section 2 of this PDAS, the nearest designated heritage assets are a collection of grade II and II* listed buildings and structures which are sited approximately between 1.4km and 1.5km to the north west which comprise the grade II* listed Cross Keys Bridge, the grade II* listed associated hydraulic engine house, and a grade II listed telephone kiosk. Given the degree of separation and intervening built form, including Sutton Bridge Power Station, the Site does not play a role in the setting of these heritage assets and no further assessment is required in that respect.

5.36 Nevertheless, it is recognised that an assessment of the Sites archaeological potential is required to ascertain the need for mitigation or further assessment. An in-depth assessment in the accompanying Heritage Impact Assessment (see Appendix 6) has concluded that there is limited archaeological potential within the Site, owing to it primarily being used for agriculture since reclamation of the land in the C19. There is potential for remains from the use of the site as an RAF training base to be present, but these will be of limited value and therefore this alone doesn't preclude the Proposed Development. It is also pertinent to note that the

now completed Sutton Bridge Solar Farm did not require any further archaeological assessments prior or during the construction phase and therefore it is expected this will remain the case for the Proposed Development given the Site is within the same land parcel.

5.37 It is considered based on the above that the Proposed Development will not have a detrimental impact on designated heritage assets or archaeological significance and thus the Proposed Development complies with policy 29 of the SELLP.

Health and Safety

5.38 Policy 30 of the SELLP refers to the need for development to not compromise the health and safety of the public. A Battery Safety Management Plan has been prepared by Envams and reviewed by a Chartered Fire Engineer and is submitted with this application (see Appendix 3). It sets out in detail the robust measures incorporated within the design of the scheme and the equipment more generally to ensure that it meets industry standards and the National Fire Protection Association (NFPA) 855 (2023): Standard for the Installation of Stationary Energy Storage Systems as well as being in accordance with the current National Fire Chiefs Council Guidance (November 2022).

5.39 To summarise, the BESS includes advanced systems which prevent conditions that lead to thermal runaway or other fire related incidents which in the first instance minimises the likelihood of any fire occurring. Nevertheless, for the highly unlikely event of this failing, there are also early detection systems in place to ensure a fast response. Furthermore, there are design features such as fire-resistant materials, thermal barriers between battery storage units, and adequate separation distances to prevent the spread of fire. Finally, there are also provisions within the design for on-site water storage and readily accessible fire hydrants which will help to support emergency responders in fighting the fire.

5.40 As a result, the Proposed Development will meet the highest of standard in terms of reliability but also health and safety in the highly unlikely event of equipment failure. On this basis, the requirements of policy 30 are met.

Provision of Best and Most Versatile Agricultural Land (BMV)

5.41 One of the requirements of policy 3 of the SELLP is for development proposals to demonstrate that they ‘’*protect best and most versatile soils’’.* An Agricultural Land Classification Survey (‘ALC survey’) was undertaken to ascertain the quality of soil on the Site prior to the submission of the planning application for Sutton Bridge Solar Farm (see Appendix 1). This concluded that the field in which the Site is located comprised 100% grades 1 and 2 land.

5.42 Whilst it is acknowledged that the Proposed Development will lead to the loss of agricultural land, it is pertinent to note that this 3.77 ha parcel of land lies within the now operational Sutton Bridge Solar Farm which surrounds the Site. Consequently, the ability to farm the land within the Site has already been lost due to the Sutton Bridge Solar Farm. The Proposed Development will be in situ for the same temporary period as Sutton Bridge Solar Farm and thus once restoration has taken place, the land will be available for the purpose of agriculture if required. As a result, whilst technically the Proposed Development conflicts with policy 3, it is considered that when all other material considerations are taken into account, this conflict is minor and carries very limited weight in the planning balance.

6 Summary and Conclusions

6.1 The Proposed Development seeks planning consent for the development of a BESS which will be operational for a 40-year period.

6.2 The Proposed Development is an important step in supporting the growth and wider use of renewable energy within the UK. The storage capacity that the scheme will deliver will help that electricity supply grid to capture energy generated by renewable energy sources that otherwise would potentially go unused.

6.3 The Proposed Development is fundamentally a sustainable development, playing a major role in the reduction of greenhouse gas emissions and helping to achieve net zero. On that basis the application proposals are wholly consistent with the aims of the NPPF, and local planning policy as outlined in the South East Lincolnshire Local Plan.

6.4 The application Site is located within the wider Sutton Bridge Solar Farm which is now operational. This allows the scheme to minimise the impact of any required cabling connections to facilitate the BESS in supporting the wider electrical supply network and helps to reduce landscape impact.

6.5 Whilst the Site is within Flood Zones 3a and 2 along with the majority of the surrounding area, as essential infrastructure it is deemed to be compatible with this location. Furthermore, there is a clear operational requirement for it be located adjacent to the operational Sutton Bridge Solar Farm and the site-specific FRA demonstrates the development will be safe from flooding in any event. As such, the sequential and exception tests are passed.

6.6 This application is accompanied by a broad suite of comprehensive technical assessments that demonstrate that the Proposed Development will not result in any unacceptable amenity or environmental effects.

6.7 It is on the basis of the above that the proposals should be supported by Planning Officers and the scheme recommended for approval.