Planning, Design and Access Statement for a Battery Energy Storage System (BESS) and Associated Infrastructure.

Land at West Leake Lane, Winking Hill.

On behalf of Renewable Energy Systems Ltd.

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Document Management.

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Contents.

1. Introduction

1.1. This Planning Statement has been prepared by Pegasus Group on behalf of Renewable Energy Systems Limited (RES) ("the Applicant"). Planning permission is sought for the installation of a BESS on Land at West Leake Lane, Winking Hill. The Site location is provided in the submitted Location Plan. ref. 04875-RES-MAP-DR-XX-001 Rev 4).

1.2. The proposal seeks to deliver a battery energy storage system (BESS) and associated infrastructure capable of delivering up to 99.9MW storage. The description of development is as follows:

"**Installation of an energy storage facility including battery enclosures, power conversion units, transformers, substations, grid connection infrastructure, vehicular access and associated works.**"

1.3. Battery storage technologies are essential to speeding up the replacement of fossil fuels with renewable energy. Battery storage systems will play an increasingly pivotal role to responding to electricity demands. Battery storage, or BESS, are devices that enable clean energy from renewables, like solar and wind, excess to requirements to be stored and then released when the power is needed most, rather than being lost.

The Applicant

1.4. RES is the world's largest independent renewable energy company with 40 years' experience developing, constructing and operating renewable energy assets. RES has delivered more than 21GW of renewable energy projects across the globe and supports an operational asset portfolio of over 7GW worldwide for a large client base all under long term contracts.

1.5. The Group's head office in Kings Langley, near London, is complemented by other offices across the UK including Glasgow, Gateshead, Truro, Cardiff and Larne. Internationally, RES has overseas subsidiary offices in France, Scandinavia, Australia, New Zealand, Canada, Turkey, Germany, and across the USA. The RES Group employs 4,500 staff. RES is a privately-owned company that grew out of the Sir Robert McAlpine group, a family-owned firm with over 130 years of experience in the construction and engineering sector. RES has strong in-house engineering and technical capability and operates in five main technology areas: on/offshore wind, solar, storage, green hydrogen and transmission & distribution.

1.6. RES has been working in the battery energy storage market for a decade and is an industry leader in the delivery and operation of energy storage projects. RES has developed over 830MW of energy storage projects across the UK and Ireland and currently manage over 600MW of operational storage projects with 24/7/365 monitoring provided from our control centre in Glasgow.

1.7. RES's first battery storage facility in the UK was in 2016 and consisted of the 330kW Copley Wood Project. This was designed, constructed and operated by RES for Western Power Distribution and was integrated into the existing solar farm infrastructure. In 2018, RES successfully handed over the Broxburn Battery Storage facility (20MW), the Port of Tyne Battery Storage facility (35MW) and Tynemouth Battery Storage facility (25MW) which RES designed and constructed using Samsung batteries and SMA inverters with associated civil and electrical works. RES has been retained as both the Asset Manager and O&M service

provider for the projects which has been successfully delivering frequency response services to National Grid since 2018.

1.8. More recently, between 2020-2024, RES has successfully developed, consented and secured investment for over 450MW of energy storage projects across the UK.

Supporting Documentation

1.9. The documents submitted in support of this application are detailed within the submitted Covering Letter (Ref L004v0 PL).

Statement Approach

1.10. The development management issues relevant to the application proposal are discussed in this statement. The subsequent sections of this statement are divided into:

- Section 2 – Site Description and Planning History
- Section 3 – Proposed Development
- Section 4 – Planning Policy
- Section 5 – Design and Access Statement
- Section 6 – Assessment of Development
- Section 7 – Planning Balance
- Section 8 – Conclusions

1.11. This statement outlines the context of the application site and surrounding area, and the need for the proposed development, including an assessment of how it accords with relevant national and local planning policies as well as material considerations.

2. Site Description and Planning History

2.1. The site is located on land at Winking Hill Farm, West Leake Lane (Please refer to Site Location plan – Reference 04875-RES-MAP-DR-XX-001 Rev 4). Winking Hill Farm comprises approximately 4.5 hectares of agricultural land, and an aerial image of the site can be seen below at Figure 1.

Figure 1: Aerial Image of Site

2.2. The site lies outside of a nationally designated landscape (National Parks, AONBs). The site also lies outside of any locally designated landscapes. The site is located within the Green Belt.

2.3. It is acknowledged that the site is located within the Nottinghamshire Wolds Regional Landscape Character Area described within the Greater Nottingham Landscape Character Assessment (2009) as "a sparsely settled and remote rural region characterised by rolling clay Wolds, mixed farming, small red brick villages and narrow country lanes."

2.4. There are no nationally designated sites within or adjacent to the proposed site. The Gotham Hill SSSI is located approximately 1.9km to the east and Lockington Marshes SSSI is located approximately 1.8km to the west.

2.5. The site is located within Flood Zone 1, an area identified as being at lowest risk of flooding. It is however acknowledged that there is an area of surface water flooding in the northeast of the site.

2.6. Natural England's Agricultural Land Classification (ALC) mapping identified that the land in the area was most likely to be Grade 3 agricultural land.

Planning History

2.7. On the 29th of August 2006, an application was submitted to Rushcliffe Borough Council for a change of use from garage to office use (reference: 06/01451/COU). The application was permitted on the 4th October 2006.

2.8. On the 7th of September 2006, an application was submitted to Rushcliffe Borough Council for a single storey extension to Unit 3 and change of use of part of outbuildings to form Unit 6 (for office use) (reference: 06/01450/FUL). This application was permitted on the 6th October 2006.

2.9. On the 6th of November 2013, an application was submitted to Rushcliffe Borough Council for the construction of a new field access off West Leake Lane (reference: 13/02216/FUL). This application was permitted (conditional) on the 18th December 2013.

2.10. It is acknowledged that there are a handful of applications within the vicinity of the application site, these include:

- 23/01285/FUL – Proposed Battery Energy Storage Facility. Application Refused, Appeal Ongoing.
- 22/01339/LDO – Proposed Local Development Order for development at Ratcliffe on Soar Power Station. Application Approved 19 July 2023.

3. Proposed Development

Need for Development

3.1. There is an explicit need for the renewable energy generation, which is driven by a plethora of government legislation at both local and national level in the UK.

3.2. In June 2019, the UK became the first major economy to implement a legally binding net zero carbon emissions target by 2050. Decarbonising the power sector is integral to achieving this target and requires major investments into renewable technologies, which are supported by planning policy at both local and national levels.

3.3. The National Infrastructure Committee (NIC), official advisor to the Government on Infrastructure, has published a report (Net-Zero Opportunities for the Power Sector, March 20202) setting out the key infrastructure requirements needed to meet the UK's 2050 net-zero target, including the amount of renewable energy development that would need to be deployed. The NIC recommends that in meeting these targets, the UK's energy mix needs to be made up of around 90% renewables. The NIC recommends that across all scenarios, significant levels of solar, onshore wind and offshore wind will need to be deployed with between 129-237GW (gigawatts) of renewable energy capacity in operation by 2050.The Climate Change Act 2008 introduced the first legally binding target for 2050 to reduce greenhouse gases by 80%. This was further enhanced in 2019 with the UK Government amending the Act to a target of achieving net zero greenhouse gas emissions by 2050. Electricity demand is set to increase significantly as fossil fuels are phased out. More recently the Intergovernmental Panel on Climate Change (IPCC) published their latest report on the global climate, Assessment Report 6 (AR6) in August of this year (2021). The report overwhelmingly strengthens the scientific evidence of the human influence on the climate system. While there is a combination of climatic impact-drivers, fossil fuel emissions are a principal contributor to the climate crisis, so replacing gas and coal powered electricity generators with clean renewable technology is critical if we are to start to undo the decades of damage that has initiated climate change. Governments, local authorities, communities, and businesses all have a responsibility to play their part in addressing the climate emergency and this project aims to help achieve that.

3.4. The UK is moving towards a greater proportion of renewable energy generation and a reduction in more stable and consistent fossil-fuel based generation. From National Grid's point of view, that means more electricity storage and flexibility is required in the network to help stabilise supply and demand, give the increasingly intermittent power generation mix. With greater support from demand-side storage and flexibility, mass energy black-out incidents can be reduced. National Grid's Future Energy Scenarios forecast a minimum of 23.5 GW of storage is needed by 2050 to meet our net zero carbon goals, which are to be set for 2035 – increasing the expediency to act now.

3.5. In October 2024, it was also announced that a new strategic plan for the UK's renewable energy infrastructure is in the process of being developed. The Government's announced at COP29 in Azerbaijan an ambitious new target to reduce greenhouse gas emissions by at least 81% by 2035 on 1990 levels.

3.6. Battery storage facilities are essential infrastructure to support the UK's climate change targets, in maintaining and balancing a continuous supply of energy generated from renewable sources. This flexibility approach adds resilience to energy supply and allows the

storage of energy until required through the electricity grid and before it is lost through un-use.

NPS EN-1

3.7. As discussed within EN-1 at paragraph 3.3.5, new generating plants can deliver a low carbon and reliable system, but we need the increased flexibility provided by new storage and interconnectors (as well as demand side response) to reduce costs in support of an affordable supply.

3.8. This is further re-iterated in the following paragraph where it is stated that:

"*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 to meet peak demand is reduced, bringing significant system savings alongside demand side response (up to £12bn per year by 2050). Storage can also reduce the need for new network infrastructure. However, neither of these technologies, as with demand side response, are sufficient to meet the anticipated increase in total demand, and so cannot fully replace the need for new generating capacity.*"

3.9. When considering the benefits of battery storage projects, it is clear within EN-1, that battery storage is needed to reduce the costs of the electricity system and increase reliability by storing surplus electricity in times of lower demand to provide electricity when demand is higher. At Paragraph 3.3.27 it is outlined that Storage can provide various services, locally and at the national level. These include, "*maximising the usable output from intermittent low carbon generation (e.g. solar and wind), reducing the total amount of generation capacity needed on the system; providing a range of balancing services to the NETSO and Distribution Network Operators (DNO) to help operate the system; and reducing constraints on the networks, helping to defer or avoid the need for costly network upgrades as demand increases.*"

3.10. It is confirmed within this document that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure (Para 4.2.4). Finally, paragraph 4.2.5 adds that electricity grid infrastructure, such as this, is identified as low carbon infrastructure and is not limited to that associated specifically with a particular generation technology. It also states that electricity storage has a key role to play in achieving net zero and providing flexibility to the energy system.

Clean Power 2030:Action Plan (December 2024)

3.11. Following the issue of the revised NPPF in December 2024, the Government also released the Clean Power 2030 Action Plan: A new era of clean electricity.

3.12. The Action Plan highlights that achieving clean power is now a broader goal and key to growing the economy and improving national security and standards of living. The document identifies urgency of enacting policy by "***Sprinting to clean, homegrown energy***", placing delivering clean power by 2030 at the heart of one of the Prime Minister's five missions and the Plan for Change.

3.13. The Action Plan outlines tree major challenges as being "**the need for a secure and affordable energy supply, the creation of essential new energy industries, supported by skilled workers in their thousands, the need to reduce greenhouse gas emissions and limit our contribution to the damaging effects of climate change**." There is a clear link made between the steps to address energy security and climate change and the potential economic benefits form employment and investment in the energy industry, assisting the national plan for growth. The document (at page 20) refers to the Clean Power 2030 action plan "**Playing a key part in supporting hundreds of thousands of jobs, as part of the wider transition to net zero**".

3.14. The Government have indicated that a programme of investment worth around £40 billion per year for the next 6 years is on the horizon, and battery storage plays a crucial role in meeting the growth of electricity demand and maintaining a secure energy supply.

3.15. The Government have specifically stated their ambitious target of 23-27 GW of battery capacity before 2030 within the Action Plan. It is clear from this document that the Government acknowledges the importance of battery storage schemes such as the Proposed Development, and they are going to be increasingly more crucial for meeting national and international targets to reach net-zero.

3.16. In terms of the need to act immediately and take the opportunity for renewable energy where grid capacity is present, the Action plan states at page 50 "***There is particular urgency to accelerate the planning process across Great Britain for energy infrastructure since we do not have long for many clean power projects to begin construction if they are to be operational for 2030".*** In relation to existing network constraints and steps to deliver the decarbonised power system by 2030, the Action Plan states (at page 63) *"**Wherever renewables can connect to the distribution network, this should be encouraged for reasons of speed and efficiency**."*

Climate Change Emergency

3.17. Rushcliffe Borough Council declared a Climate Change Emergency in March 2019. For planning this means *'encouraging sustainable patterns of development which will help conserve the environment, encouraging good design in new development and awareness of the historic and cultural heritage of the area.'*

4. Proposal

4.1. The proposed development is a battery energy storage system (BESS) and associated infrastructure capable of delivering up to 99.9MW storage. The proposed BESS will be able to store, release or absorb energy from the electricity network. It will supply energy to the network during times of peak demand. The site layout is detailed on the enclosed Infrastructure Layout (Drawing Number 04875-RES-LAY-DR-PT-001 Rev 4).

4.2. The site boundary for the application allows for all development associated with the proposed development, including connection to the grid and landscaping features.

4.3. The description of development is as follows:

"**Installation of an energy storage facility including battery enclosures, power conversion units, transformers, substations, grid connection infrastructure, vehicular access and associated works.**"

4.4. The development would consist of modified ISO-style shipping enclosures set on concrete foundations, with typical dimensions of 6.1m long, 2.4m wide and 2.9m high. Heating Ventilation and Air Conditioning (HVAC) units are located at each end of each enclosure. Other equipment required to support the development may include:

- Power Conversion Systems and Transformers (8.1m x 2.4m x 2.4m)
- BESS Substation (10m x 5m x 4.5m)
- DNO Substation (5.3m x 2.3m x 6.5m)
- Auxiliary Transformer (2.5m x 2.3m x 2.7m)
- Harmonic Filter (6m x 3m x 2.7m)
- Pre-Insertion Resistor (3.3m x 2.7m x 2.7m)
- Capacitor Bank
- Spare Container (12.2m x 2.4m x 2.9m)
- Security (incl provision of 4m CCTV cameras [only with coverage of the site area. Not externally facing])
- Security Fencing (up to 3m high)
- Acoustic Fencing (up to 4m high)

4.5. Access to the site will be obtained from West Leake Lane to the eastern boundary of the site. A secondary emergency access has been included, just north of the proposed access along West Leake Lane. This access will not be used during the construction or operation of the project, and will only be used by emergency service vehicles during an emergency.

Point of Connection

4.6. A grid application for Winking Hill BESS was obtained in December 2022 following discussions with the Distribution Network Operator (DNO). The substation at the Ratcliffe on Soar Power Station was identified by the DNO as having capacity for 99.9MW battery storage connected by underground cable. As discussed in the submitted Site Alternative Study and the associated Technical Note (Ref 04875-8812629), transmission and distribution of electrical energy across longer distances naturally create greater electricity losses in the system due to the increase of line impedance. Therefore, when designing new battery storage sites, extra effort must be taken to find land which is close to a suitable point of connection.

Site Management

4.7. Once operational, the facility will be remotely controlled and as such will be unmanned. There will however be a visit to the site approximately once a month by a car, van or light goods vehicle, to carry out regular inspections and routine maintenance. Parking for these visits will be accommodated on site.

4.8. It is possible that one or more medium or large components may require replacement during the operational life of the facility. The nature of the traffic associated with such works will be similar to that used in the construction phase of the project but will be present for a much shorter duration. Should the scale of the works be such that traffic management measures would be required to manage vehicle movements to and from the site, the necessary permissions shall be sought from the local authority in line with due process.

5. Planning Policy

Legislative Background

5.1. This chapter summarises the planning policies and guidance relevant to the development proposed. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission must be determined in accordance with the adopted development plan unless material considerations indicate otherwise. The National Planning Policy Framework (the "Framework") does not change the statutory status of the development plan as a starting point for decision making but states the importance of the existence of an up-to-date development plan.

Local Policy Context

5.2. The current adopted Development Plan for Rushcliffe Borough Council comprises the Local Plan Part 1: Core Strategy (2014) and Local Plan Part 2: Land and Planning Policies (2019). The local policies recognised as relevant to any subsequent application are as follows:

5.3. Local Plan Part 1: Core Strategy (2014)

- Policy 1 – Presumption in Favour of Sustainable Development
- Policy 2 – Climate Change
- Policy 3 – Spatial Strategy
- Policy 4 – Nottingham-Derby Green Belt
- Policy 10 – Design and Enhancing Local Identity
- Policy 11 – Historic Environment
- Policy 14 – Managing Travel Demand
- Policy 17 – Biodiversity

Specifically, Policy 2 'Climate Change' states:

" 1. All development proposals will be expected to mitigate against and adapt to climate change, and to comply with national and local targets on reducing carbon emissions and energy use, unless it can be clearly demonstrated that full compliance with the policy is not viable or feasible.

Decentralised, Renewable and Low Carbon Energy Generation

5. The extension of existing or development of new decentralised renewable and low-carbon energy schemes appropriate for Rushcliffe will be promoted and encouraged, including biomass power generation, combined heat and power, wind, solar and micro generation systems, where these are compatible with environmental, heritage, landscape and other planning considerations. In line with the energy hierarchy, adjacent new development will be expected to utilise such energy whenever it is feasible and visible to do so."

5.4. Core Strategy Policy 4: Nottingham – Derby Green Belt is the strategic policy confirming the extent of the green belt and inset settlements within the Green Belt. The application site falls within the area identified as Green Belt.

5.5. Local Plan Part 2: Land and Planning Policies (2019)

- Policy 1 – Development Requirements
- Policy 16 – Renewable Energy
- Policy 17 – Managing Flood Risk
- Policy 18 – Surface Water Management
- Policy 21 – Green Belt
- Policy 28 – Conserving and Enhancing Heritage Assets
- Policy 29 – Development Affecting Archaeological Sites
- Policy 38 – Non-Designated Biodiversity Assets and the Wider Ecological Network
- Policy 41 – Air Quality

Specifically, Policy 16 'Renewable Energy' states:

"Proposal for renewable energy schemes will be granted planning permission where they are accepted in terms of:

a) Compliance with Green Belt policy;

b) landscape and visual effects;

c) ecology and biodiversity;

d) best and most versatile agricultural land;

e) the historic environment;

f) open space and other recreational uses;

g) amenity of nearby properties;

h) grid connection;

i) form and siting;

j) mitigation;

k) the decommissioning and reinstatement of land at the end of the operational life of the development;

l) cumulative impact with existing and proposed development;

m) emissions to ground, water courses and/or air;

n) odour;

o) vehicular access and traffic; and

p) proximity of generating plants to the renewable energy source."

5.6. In reference to the Green Belt, Policy 21 confirms that "*Applications for development in the Green Belt will be determined in accordance with the National Planning Policy Framework*".

National Planning Context

5.7. In June 2019, the UK became the first major economy to implement a legally binding net zero carbon emissions target by 2050. Decarbonising the power sector is integral to achieving this target and requires major investments into renewable technologies, which are supported by planning policy at both local and national levels.

5.8. The National Infrastructure Committee (NIC), official advisor to the Government on Infrastructure, has published a report (Net-Zero Opportunities for the Power Sector, March 2020) setting out the key infrastructure requirements needed to meet the UK's 2050 net-zero target, including the amount of renewable energy development that would need to be deployed. The NIC recommends that in meeting these targets, the UK's energy mix needs to be made up of around 90% renewables. The NIC recommends that across all scenarios, significant levels of solar, onshore wind and offshore wind will need to be deployed with between 129-237GW (gigawatts) of renewable energy capacity in operation by 2050.

5.9. Furthermore, the National Policy Statement for Renewable Energy Infrastructure (EN-3) acknowledges that electricity generation from renewable sources of energy is an essential element of the transition to net zero. Paragraph 2.9.26 of EN-3 states:

"As the electricity grid sees increasing levels of generation from variable renewable generators such as offshore wind, onshore wind and solar power, there will be an increasing need for storage infrastructure to balance electricity supply and demand."

National Planning Policy Framework

5.10. The National Planning Policy Framework (NPPF) (the "Framework") was first published in 2012 and most recently revised in December 2024. The Framework sets out the UK Government's planning policies for the planning system to ensure that it helps to achieve sustainable development, which Paragraph 7 cites to be the overall purpose of the planning system. The Framework forms a material consideration in the assessment of all planning applications. Paragraph 3 confirms the Framework should be read as a whole.

5.11. The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development in its three dimensions; economic, social and environmental. Central to the NPPF is presumption in favour of sustainable development. For decision taking this means (paragraph 11):

- *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:

    i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or

    ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination."

5.12. Paragraph 161 of the NPPF states that the planning system should support transition to a net zero by 2050. This involves taking full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change, which should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience, encouraging the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

5.13. Paragraph 164 of the NPPF states that new renewables development should be planned for in ways that:

a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through incorporating green infrastructure and sustainable drainage systems; and

b) can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.

5.14. Paragraph 166 outlines that when determining planning applications, local planning authorities should expect new development to:

a) comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and

b) take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

5.15. Finally, Paragraph 168 states that, when determining planning applications for renewable and low carbon development, local planning authorities should:

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

b) *recognize that small-scale and community-led projects provide a valuable contribution to cutting greenhouse gas emissions;*

c) *in the case of applications for the repowering and life-extension of existing renewable sites, give significant weight to the benefits of utilising an establishes site.*

5.16. In relation to Green Belt, the NPPF identifies the purposes of the Green Belt in Paragraph 144 and at 153 states that "Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances (VSC). Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations".

5.17. Paragraph 153 also states that substantial weight should be given to any harm to the Green Belt, including harm to its openness.

5.18. Paragraph 154 sets out the exceptions to inappropriate development in the Green Belt. Paragraph 155 also confirms other development which would not be inappropriate.

5.19. The proposed development does not fall into these exceptions and would be considered inappropriate development where VSC needs to be demonstrated.

5.20. In this regard, Paragraph 160 states:

"*When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.*"

Clean Power 2030:Action Plan (December 2024)

5.21. As detailed above, the Government have recently published their Clean Power 2030 Action Plan. It is noted that this document makes reference to a number of policy and guidance being outdated and needing to be brought up to speed with new policies.

6. Design and Access Statement

6.1. This section of the report seeks to demonstrate that the Applicant has fully considered the design and access issues as part of the comprehensive preparation of the scheme prior to the submission of the planning application. This section of the report covers the following matters:

- Use
- Amount
- Layout
- Scale
- Landscape
- Appearance; and
- Access

6.2. This section should be read in conjunction with the entire application submission in order to fully understand the development, its potential impacts and planning merits. The purpose of the proposed development is to support resiliency and sustainability objective at both the local and national level. The National Planning Policy Framework (NPPF), National Planning Practice Guidance (NPPG), and the Rushcliffe Local Plan in principle support of the delivery of renewable energy infrastructure.

Design

6.3. A considerable number of factors have contributed towards the design and layout of the proposed scheme. These are discussed against the various aspects of design highlighted within the former CABE's guidance document regarding the production of Design and Access Statements.

6.4. An important factor in finalising the proposals has been consultation with the community and local stakeholders. This process is summarised in the accompanying Statement of Community Involvement.

Layout

Scheme Evolution

6.5. A thorough constraints analysis was undertaken to inform the final scheme.

6.6. In proposing the general layout of the development, great consideration was given to the retention of the established perimeter planting of native hedgerows and trees to West Leake Lane (east) and Remembrance Way (A453) (north). This helps to ensure that the development is well contained both physically and visually. In addition, a number of other constraints were considered, and appropriate offsets applied where necessary. The constraints and their consideration as part of the design scheme are as follows:

Constraint		Consideration as Part of Design
1	Site Access	The existing field access has been proposed as the main point of access for the development. The access strategy has been developed with the transport engineers, ecologists and arboricultural surveyors who ensured that all impacts on the existing hedgerows and trees. Appropriate turning for all vehicles required has also been accounted for. A secondary emergency access has been included, just north of the proposed access along West Leake Lane. This access will not be used during the construction or operation of the project, and will only be used by emergency service vehicles during an emergency.
2	Trees and Hedgerows	A tree survey has been undertaken on the site and appropriate root protection zones have been accounted for within the scheme. Appropriate offsets have been given to hedgerow protection and ecological enhancements incorporated into the finalised scheme.
3	Surface Water Drainage	It is acknowledged that there are areas of the site susceptible to surface water flooding. All infrastructure has been located outside of these areas.
4	Utilities	It is acknowledged that an existing buried 132kV cable runs along the northern boundary of the site. A minimum buffer of 5m has been applied to this infrastructure within the design.
5	Noise	An Acoustic Impact Assessment has been undertaken, the result of which concluded that, in the context of the relevant assessment criteria (ie. BS 4142) any impact will be low, and can be considered 'present and not intrusive' in terms of government policy guidance.
6	Archaeology	As part of the iterative process a geophysical survey was undertaken on the site. The survey recorded an unusual response along the northern boundary of the site which was noted as being clearly of modern origin and possibly associated with the ditch that forms the northern boundary. No trial trenching is proposed.

Final Scheme

6.7. The final scheme as submitted is detailed on the Infrastructure Layout (Drawing Reference 04875-RES-LAY-DR-PT-001 Rev 4). The submitted plan outlines the positions of all infrastructure within the site and accompanying drawings set out their dimensions.

6.8. The battery storage enclosures and associated PCS and transformer units have been sited in close parallel rows to reduce the amount of cabling required between each unit and to condense the area required for the overall development. Space between the equipment on site and surrounding fence has also been left in order to provide sufficient space for a crane during construction and in case of repair and augmentation.

Scale

6.9. The scale of the development on site has been determined by the equipment necessary for efficient and viable energy storage. Further details of the individual components which make up the scheme, including their proposed size and scale are set out on the submitted plans. When viewed from nearby public vantage points, the scale of development will not be overbearing due to the enclosure of the development site and the proposed planting. This is detailed on the Screened Zone of Theoretical Visibility (SZTV) included within the Landscape and Visual Impact Assessment.

Biodiversity

6.10. The supporting Preliminary Ecological Appraisal Report outlines the biodiversity net gains that can be achieved on site. The delivered net gain is significantly more than the required net gain of 10%. The total number of biodiversity units in the proposed layout post development are 15.44 habitat units and 10.73 hedgerow units. This equates to a 77.40% net gain in area habitats and a 66.16% net gain in hedgerow habitats as a result of the proposed development.

6.11. Appropriate offsets from existing features on site have been reflected within the design of the scheme. It is considered that necessary mitigation has been reflected in the scheme. Where necessary a Construction Environment Management Plan (CEMP) can be condition to any planning consent.

Landscape

6.12. A landscaping plan has been submitted (Drawing Reference P23-1398_EN_02D) which takes account of the identifies areas of sensitivity. Additional screening in the form of infilled hedgerow and new native woodland planting which would mitigate any potential impacts further.

6.13. Further consideration of the landscape and visual effects are contained within the LVA.

Use

6.14. The proposal is for the installation of a Battery Energy Storage System (BESS) on land at West Leake Lane. The description of development is:

"Installation of an energy storage facility including battery enclosures, power conversion units, transformers, substations, grid connection infrastructure, vehicular access and associated works."

6.15. The site comprises approximately 4.5 hectares and is shown on the enclosed Site Location Plan (Drawing Reference 04875-RES-MAP-DR-XX-001 Rev 4). The proposed system utilises proven lithium-iron phosphate battery technology which RES has deployed at multiple projects and locations including England, Scotland, Ireland, the USA and Canada. The majority of the infrastructure detailed below will housed on an area of hardstanding enclosed within a compound by appropriate fencing.

6.16. Due to the land requirement for such projects, these will generally need to be located outside of urban areas and within the countryside where the capacity to accommodate such development exists. At the end of the 40-year period all elements of the development will

be removed and the site will be decommissioned and restored in accordance with a decommissioning strategy. Following decommissioning the land will not be considered 'brownfield' or previously developed land.

6.17. This section of the report, and the accompanying document, including the Site Alternative Study, set out why it is considered that this particular site is well suited to accommodate the proposed use.

Amount and Fabrication

6.18. The extent of the proposed development has been refined and finalised having consideration of potential environmental effects. A thorough constraint analysis has been undertaken for the site and informed the final layout. The detailed plans for the site are submitted alongside this Planning, Design and Access Statement. The associated equipment on the site comprises:

Battery Containers

6.19. Approximately 64 battery storage enclosures would be installed to provide approximately 99.9MW of capacity. The battery enclosures will be one of two types depending on the final choice of supplier. The first type is shown on Drawing Reference 04875-RES-BAT-DR-PT-001 Rev 1 and is simply modified ISO-style shipping containers set on concrete foundations, with typical dimensions of 6.1m long, 2.4m wide and 2.9m high. Heating Ventilation & Air Conditioning (HVAC) units are located at each end of each container.

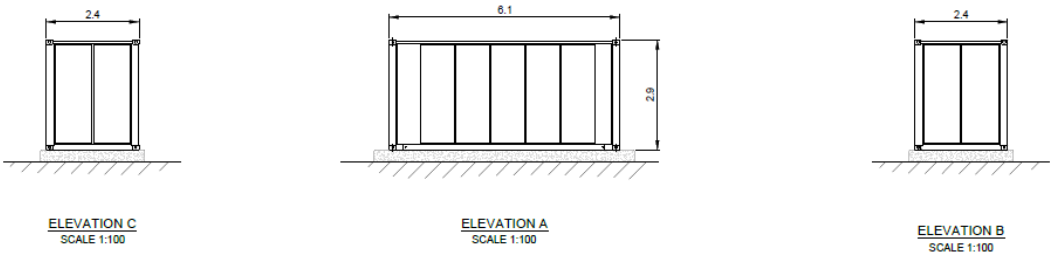

Image 5a – Battery Storage Enclosure

6.20. The second type are modular battery enclosures, also set on concrete foundations, which are 'packed' together to form similar dimensions to that of the container mentioned above.

Substations

6.21. Two substations would be required. Located adjacent to each other, these would comprise:

- BESS Substation (10m long x 5m wide x 4.5m high) (Drawing Reference 04875-RES-SUB-DR-PT-005 Rev 1)
- DNO Substation (5.3m long x 2.3m wide x 6.5m high) (Drawing Reference 04875-RES-SUB-DR-PT-006 Rev 1)

6.22. These units would be set on a concrete foundation.

Power Conversion Systems (PCS) and Transformers

6.23. Approximately 32 PCS's and transformers would be required with typical dimensions of 8.1m long x 2.4m wide x 2.4m high (Drawing Reference 04875-RES-PCS-DR-PT-001 Rev 1). These units would be set on a concrete block foundation.

Auxiliary Transformer

6.24. Two auxiliary transformers would be required with typical dimensions of 2.5m long x 2.3m wide x 2.7m high (Drawing Reference 04875-RES-SUB-DR-PT-001 Rev 1). These units would also be set on a concrete foundations measuring approximately 2.0m by 1.6m.

Spares Container

6.25. Two additional ISO-style shipping containers will be located adjacent to the battery enclosures with typical dimensions of 12.2m long x 2.4m width x 2.9m high. It would likely be finished in a shade of white, grey or green (Drawing Reference 04875-RES-BLD-DR-PT-001 Rev 1).

Security

6.26. Stand for CCTV cameras will be installed on site. The CCTV cameras are mounted on galvanised steel posts (or similar) measuring up to approximately 4m high and set in concrete foundations. The cameras may have pan, tilt and zoom functions. They will be located adjacent to the security fencing around the edge of the energy storage compound (see drawing 04875-RES-SEC-DR-PT-003 Rev 1) and will be facing into the development only. They will not be facing out of the compound.

6.27. Security fencing will be installed around three edges of the energy storage compound. The fencing will either be palisade security fencing, weld mesh or closed board wooden acoustic fencing up to 4m in height (see drawings 04875-RES-SEC-DR-PT-001 Rev 1 and 04875-RES-SEC-DR-PT-002 Rev 1). Currently, the site is designed to have security fencing around the north, east and southern sides, with acoustic fencing along the western side.

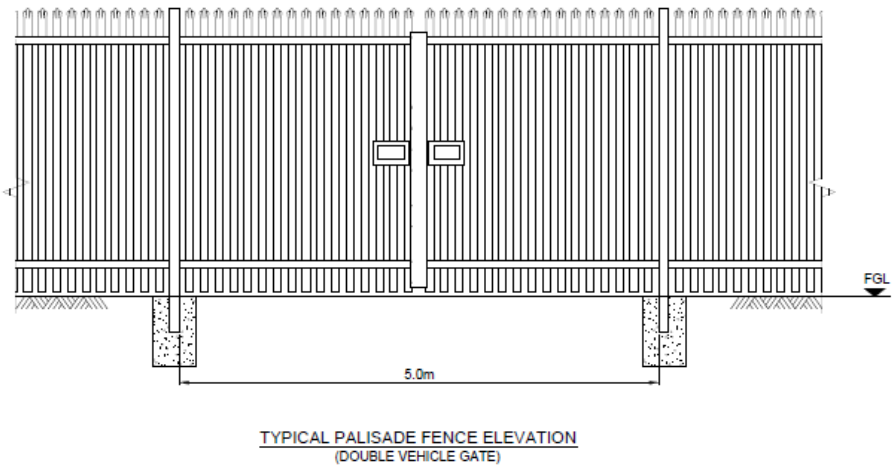

Figure 5b – Palisade Security Fencing

6.28. Lighting is provided for occasional operational and maintenance use in the hours of darkness. These lights will be directed/shielded to prevent glare and light spill onto public highways and nearby woodland. The operation and maintenance activities shall normally be limited to the hours of daylight to minimise use of artificial lighting. Lighting is only used for operational and maintenance activities.

Grid Connection

6.29. A grid application for Winking Hill BESS was obtained in December 2022 following discussions with the Distribution Network Operator (DNO). The substation at the Ratcliffe on Soar Power Station was identified by the DNO as having capacity for 99.9MW battery storage connected by underground cable.

Access

6.30. Access to the site will be obtained from West Leake Lane to the eastern boundary of the site. A secondary emergency access has been included, just north of the proposed access along West Leake Lane. This access will not be used during the construction or operation of the project, and will only be used by emergency service vehicles during an emergency.

Other Matters

Fire Risk and Management

6.31. It is proposed to use Lithium-ion phosphate battery technology which has already been deployed on multiple storage projects across the UK and in a wide range of other uses including electric vehicles to smartphones.

6.32. The fire risk associated with lithium iron phosphate battery technology is called 'Thermal Runaway' which is a self-perpetuating chain reaction in which excessive heat keeps creating more heat, potentially resulting in fire. There is, however, significant control measures in place to reduce risk considerably. These include:

- Battery technology must pass an industry test standard (U L9540A) which ensures there is no likelihood of explosion, fire would be contained within the affected battery rack and wall surfaces around the affected battery rack would not reach temperatures 60 degrees above existing temperature.
- All RES-designed battery systems must also comply with a European Standard (IEC 62485-5:2020) containing tests to ensure no external fires are allowed outside of the affected battery rack.
- Fire suppression systems fitted on each battery enclosure.
- 24/7 monitoring from an offsite control centre.
- Battery enclosures would have a fire rating of a minimum of 90 minutes.

- Any battery failures are repaired offsite with a new sealed module to replace the faulty module.

- A fire management response plan will be prepared in conjunction with the battery supplier and the local Fire Service, if the scheme is consented.

Summary and Conclusions

6.33. The Design and Access arrangements of the proposed development have been assessed. It is considered that due to the appearance of the scheme and the natural screening afforded to the site alongside the landscape and ecological enhancements proposed, the development proposals will not have an unacceptable adverse effect on the visual amenity value of the wider countryside.

6.34. The site and extent of development have been carefully selected. It is naturally screened and supplemented by additional planting which will result in only limited views of the site being possible.

6.35. Overall, the proposals are appropriate in terms of design and access and the development represents a necessary step towards meeting the UK's legally binding climate change and renewable energy obligations. It is therefore considered that the application before Rushcliffe Borough Council is to be supported and Planning Permission granted.

7. Assessment of Development

7.1. This section of the Statement contains a detailed analysis of the proposal against the policies of the Development Plan, the NPPF and NPPG. These considerations have been derived from an understanding of the site and its surroundings and the policy analysis of the previous section.

General Principle of Development

7.2. The application seeks permission for a Battery Energy Storage System (BESS) on land at Winking Hill, on land at West Leake Lane.

The National Need for the Proposal

7.3. There is a clear need for the development of renewable energy, which is driven by numerous government legislation at both a local and national level in the UK. These are discussed broadly within Section 2 of this Report. It considered that the defining documents that demonstrate a national need for renewable energy generation include, but are not limited to:

- Climate Change Act 2008;
- Climate Change Act (2050 target amendment) Order 2019
- Clean Growth Strategy published by the Department for Business, Energy and Industrial Strategy (BEIS) in October 2017
- UK Parliament declaration of an Environmental and Climate Change Emergency in May 2019
- Energy White Paper: Powering our Net Zero Future published in December 2020
- UK Government press release of acceleration of carbon reduction to 2035, dated April 2021
- 'Achieving Net Zero' published by the National Audit Office in December 2020
- Net Zero Strategy: Build Back Greener, dated October 2021
- British Energy Security Strategy, dated 7 April 2022
- The latest version of the 'Digest' of United Kingdom Energy Statistics, July 2022
- 'Powering up Britain', dated March 2023

Social, Economic and Local Community Benefits

7.4. RES seeks to be a power for good in the communities that neighbour its projects by working openly and constructively to ensure meaningful local benefits. The proposed development would generate social, economic and local community benefits, these include but are not limited to:

- Increased renewable energy generation.
- Reduction in carbon emissions has a consequential positive effect upon public health, via the reduction in greenhouse gases and associated improvements to air quality.
- Economic benefits associated with investment and support of jobs during the construction and decommissioning phase of development. RES encourage contractors to source construction materials locally and to use local transport and plant hire companies where possible, in addition to local services and amenities.
- Appropriate biodiversity and landscape enhancements via increased boundary planting and species-rich grassland.

7.5. The above outcomes associated with the scheme progressing, and associated Local Plan support for renewable energy generation, are considered to cumulatively represent very substantial benefits and as such are material consideration which weigh greatly in favour of planning permission being granted.

7.6. It is considered that the general principle of the development is acceptable. The proposed development provides a real opportunity to make a meaningful contribution to the UK's renewable energy and climate change target as well as providing opportunities to enhance local economic development. The site is sustainably located as it is considered to meet the requirements of national policy.

General Principle

7.7. Policy 16 of the Local Plan Part 2 outlines a number of key matters of significance when assessing the impact of proposals. Specifically, it is stated that planning application for renewable and low carbon energy generation will be supported, where they are acceptable in terms of:

Policy 16 Criteria	Requirements Met
Compliance with Green Belt policy	Current case law clearly outlines that the provision of renewable energy development can be considered as very special circumstances in the determination of an application. Overall, it is considered that substantial weight should be given to the benefits of the proposal in being fundamental to encouraging increased deployment of renewable energy generators connected to the grid. This amounts to a very special circumstance which outweighs the limited impact to the openness of the Green Belt in line with the NPPF.
Landscape and visual effects	During the construction and operation of the proposed development, there would inevitably be some localised effects on landscape features, character, and visual amenity. However, these effects would be

	limited and restricted in extent, in part due to screening by landform and existing vegetation. The addition of landscape enhancements and proposals shown on the Landscape Masterplan (Drawing Number P23-1398_EN_02D) would further assimilate the proposed development within the existing landscape framework of the site and its surroundings.
Ecology and biodiversity	The application is supported by a Preliminary Ecological Appraisal Report. This report concludes that the scheme would have a significant positive impact on biodiversity. Furthermore, the delivered net gain is significantly more than the required net gain of 10%. The total number of biodiversity units in the proposed layout post development is 15.44 habitat units and 10.73 hedgerow units. This equates to a 77.40% net gain in area habitats and a 66.16% net gain in hedgerow habitats as a result of the proposed development.
Best and most versatile agricultural land	30% of the land comprises what is considered to be best and most versatile (BMV) land. When compared to the average of BMV land for the Borough and nation, is well below the Borough average. It is also below the national average of 42%. Given the nature of the Borough, it has been demonstrated within the submitted Site Alternatives Study that there are no brownfield sites suitable to accommodate the proposal. Furthermore, it is considered that any impacts due to this are outweighed by the wider benefits of the scheme by the nature of renewable energy development and biodiversity net gains.
The historic environment	There are no designated assets located within the site. The closest assets are located within Kingston on Soar and Thrumpton. It is concluded within the submitted Heritage Statement that the proposed development is not considered to result in harm to any of the designated heritage assets located in the immediate surrounds.
Open space and other recreational uses	Not Applicable. The proposal does not include any designated open space or

	green infrastructure, Furthermore, there are no PROWs running within or immediately adjacent to the site that will be affected by the scheme to the extent that it would require mitigation, temporary or permanent diversion.
Amenity of Nearby Properties	The submitted Infrastructure Layout (Drawing Reference 04875-RES-LAY-DR-PT-001 Rev 4), shows a 4m high barrier of a suitable mass and density is proposed to be located on the western boundary of the battery storage facility. Operational noise and vibration generated by the proposal is also very limited. The main sources of sound within the proposed development are from the cooling fans for the inverters housed within the PCS units, air conditioning for the BESS and the transformers. However, these emit low-level sound and as such, no significant or adverse impacts regarding noise and vibration are expected as a result of this proposal.
Grid connection	A grid application for Winking Hill BESS was obtained in December 2022 following discussions with the DNO. The substation at the Ratcliffe on Soar Power Station was identified by the DNO as having capacity for 99.9MW battery storage connected by underground cable.
Form and siting	A considerable number of factors have contributed towards the design and layout of the proposed scheme. The battery storage enclosures and associated PCS and transformer units have been sited in close parallel rows to reduce the amount of cabling required between each unit and to condense the area required for the overall development. Space between the equipment on site and surrounding fence has also been left in order to provide sufficient space for a crane during construction and in case of repair and augmentation.
Mitigation	As detailed within the wider submission appropriate noise mitigation and landscape enhancement is included within the scheme.
The decommissioning and reinstatement of land at the end of the operational life of the development	The proposed development seeks permission for a 40 year operational lifetime. After the end of the operational

	lifetime the site will be returned to its original form, in this instance; agricultural land. The landscaping delivered by the proposed development will be retained. A decommissioning strategy can be conditioned to any planning consent.
Cumulative impact with existing and proposed development	Overall, when the proposed battery energy storage Facility on the opposite side of West Leake Lane is also considered alongside the Proposed Development there would be no more than minor additional cumulative effects above the landscape and visual effects set out in the main assessment contained within the Landscape and Visual Impact Assessment.
Emissions to ground, water courses and/or air	With battery storage development, there are no emissions to the air from the operation of the development. No significant effects would therefore arise in relation to this matter
Odour	
Vehicular access and traffic	The application is supported by a Construction Traffic Management Plan and Transport Statement that demonstrates that safe access and egress can be achieved on the sire during construction. It is anticipated that there will be an increase in trips to the site during the construction period but that these will reduce during the operation of the scheme when trips will be associated with maintenance only.
Proximity of generating plants to the renewable energy source	Whilst it is acknowledged that the proposed development does not provide for a generating station, it comprises nationally important renewable energy infrastructure. The key factor in the siting of the proposed development is the proximity to the point of connection at Ratcliffe on Soar Power Station. As demonstrated within the Site Alternative Study, there are no alternative available sites within the identified area of search.

7.8. It is considered that this is the main local policy against which renewable energy development will be assessed.

7.9. Planning permission should therefore be granted unless adverse effects of the development outweigh these beneficial impacts. The individual policy considerations are provided below,

in order to make this judgement. As this Planning Statement demonstrates, the scheme is in accordance with the key policies from within the Development Plan.

7.10. It is considered that the general principle of the development is acceptable. The proposed development provides a real opportunity to make a meaningful contribution to the UK's renewable energy and climate change target as well as providing opportunities to enhance local economic development. The site is suitably located as is considered to meet the requirements of national policy.

Green Belt

7.11. The proposed development site is located within the designated Derby and Nottinghamshire Green Belt as defined by the policies of the Local Plan.

7.12. Paragraph 153 of the NPPF, relating to development proposals affecting the Green Belt outlines that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

7.13. Paragraph 154 and 155 provides exceptions for development in the Green Belt and which this proposal does not fall in to. Therefore, the development of an energy storage project in the Green Belt would represent inappropriate development when assessed against planning policy.

7.14. With regards to renewable energy development, paragraph 160 states:

"When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources."

7.15. Paragraph 168 part A states that *"when determining planning applications for all forms of renewable and low carbon energy developments 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."*

7.16. This clearly outlines that the provision of renewable energy development can be considered as very special circumstances in the determination of an application. The only matter left to assess is then whether the benefits of the development significantly outweigh the impacts on the openness of the Green Belt.

7.17. Paragraph 143 of the NPPF identifies that the five main principles of the Green Belt are as follows:

a) To check the unrestricted sprawl of large built-up areas;

b) To prevent neighbouring towns merging into one another;

c) To assist in safeguarding the countryside from encroachment;

d) To preserve the setting and special character of historic towns; and

e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

7.18. A number of aspects of the proposed development as outlined in the application will assist in achieving these benefits, including additional landscaping and planting.

7.19. The siting and scale of the proposed development would not significantly impact the openness and permanence of the Green Belt and we consider that it would not impact the purposes for inclusion within the Green Belt which are considered below.

7.20. The development does not contribute to urban sprawl (purpose a), nor does it assist in merging towns (purpose b) as it is not an urban form of development and is commonplace within rural areas due to size and development constraints on brownfield land. The proposal does not form an urban feature. The preservation of the setting and special character of historic towns (purpose d) is not relevant to this development. Finally, with respect to purpose (e) there are no derelict urban land sites available and it is not considered that the proposal is in conflict with this objective. As such, it is considered that the proposal conflicts only with purpose (c). It is however demonstrated within the wider submission that the scheme would be physically limited to the site itself and it would result only in localised effects on landscape features, character, and visual amenity. The 4.5ha development proposal represents only 0.03% of the approximately 17,200ha of Green Belt within the Rushcliffe District. It is also relevant that the temporary nature of the proposal means that any encroachment into the Green Belt arising would not be permanent.

7.21. The design enhances the characteristics of the landscape character through significant levels of new native tree and hedgerow planting. The delivered net gain is significantly more than the required net gain of 10%. The total number of biodiversity units in the proposed layout post development are 15.44 habitat units and 10.73 hedgerow units. This equates to a 77.40% net gain in area habitats and a 66.16% net gain in hedgerow habitats as a result of the proposed development.

7.22. As detailed within the submitted Landscape and Visual Assessment, the total extent of the landscape and visual effects would be localised and limited in nature.

7.23. With regards to the final principle of the Green Belt, the submitted Site Alternatives Study (Report Ref R001v3), undertakes a check of the relevant Brownfield Register and there are no viable site in close proximity to the point of connection at Ratcliffe on Soar Power Station. No available brownfield sites of sufficient size to accommodate the proposal were identified within the study.

7.24. The above clarifies that the proposal does not relate or impact the five purposes of the Green Belt thereby the impact of the development on the Green Belt designation is to be limited.

<u>Very Special Circumstances</u>

7.25. Policy 21 of the Local Plan Part 2 states:

"1. The boundaries of the Green Belt in Rushcliffe are as defined on the Policies Map.

2. Applications for development in the Green Belt will be determined in accordance with the National Planning Policy Framework."

7.26. As outlined above, the proposal does not impact on four of the five principles of the Green Belt (those being a, b, d and e) and only has the potential to impact on purpose (c), and the impact on openness is limited. Furthermore, the development is of temporary nature as confirmed in the Renewable Energy PPG. The landscaping delivered by the proposed development will be retained after decommissioning. The application is supported by a Landscape and Visual Impact Assessment (LVA) that conclude that it is considered with regard to the sensitive design of proposed development and the additional landscape mitigation proposed that the actual perceivable extent of any harm to the Green Belt is relatively limited, especially in future years as the mitigation develops. As such, the proposal would not result in significant adverse impacts to the Green Belt. The benefits of the renewable energy output in satisfying, local, national and international renewable energy targets would therefore significantly outweigh the impact of the Green Belt and would satisfy the 'Very Special Circumstances' Test, this is considered in further detail below.

7.27. As outlined, there is a need for this type of development as promoted through a number of international, national and local targets for renewable energy across all areas of the country. Paragraph 168 of the NPPF outlines that local authorities should not require the applicant to demonstrate the need for renewable energy. Chapter 14 of the NPPF clearly substantiates the importance of renewable energy developments across the country and suitably supports the principle of development for these technologies.

7.28. It is considered that this shows a clear direction of travel at a national level in support of renewable energy generation in England.

7.29. The use of battery storage to support renewable energy development has been discussed in recent case law. A recent Green Belt example of this being the Lowlands Farm Appeal in Halesowen (Appeal Reference APP/C4615/W/24/3341383) in which the Inspector recognised that electricity storage has a key role to play in achieving net zero and providing flexibility to the energy system. As a result, significant weight was afforded to the benefits of energy security, flexibility and contributing to achieving net zero. Additionally, the Inspector also had regard to the paragraph 4.1.7 of EN-1 which states that it is likely that the need for critical national policy projects will outweigh the residual effects in all but the most exceptional cases. In this case therefore, it was considered that the material considerations and benefits demonstrated as part of the scheme would outweigh the harms to the Green Belt and therefore very special circumstances existing to justify the development.

7.30. Similarly, this approach was echoed by the Inspector at Werrington (Appeal Ref APP/B3438/W/23/3335922) who stated that '*support for such energy storage development is clearly set out by the Government's energy strategy and the Framework'* and the notion that the Government's intention to move away from fossil fuels, '*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.'* When considering the Green Belt in this case, the Inspector concluded that:

"*Noting the substantial weight to be given to the Green Belt harm in terms of its impacts on openness and having carefully considered any other that has been identified, I find that the acceptability of the proposed scheme is finely balance. Due to the limited harm I have found in relation to the openness of the Green Belt, notwithstanding the substantial weight*

attributed to it, and considering the potential for other harm to be mitigated or addressed through the development or attached conditions, I find that, on balance, the benefits in favour of the proposal, when considered cumulatively and individually, would clearly outweigh the limited Green Belt harm and other identified harm."

7.31. In reviewing these appeal decisions, and those issued in relation to renewable energy development, there is a very clearly a consistent approach from the Secretary of State and appointed inspectors in determining appeal over the last two years that either 'significant' or 'substantial' weight should be given to this benefit.

7.32. The wider benefits of the proposed development have been outlined above along within the numerous supporting documents. These include, but are not limited to:

- Enabling the move to a bigger reliance on low carbon and renewable energy in achieving net zero for which there is a clear and urgent need as set out in the Local Plan, NPPF and National Policy Statements.

- A deliverable scheme with a viable and available grid connection at Ratcliffe on Soar Power Station. It has been demonstrated that there are no available sites to accommodate the development.

- Biodiversity Net Gains - The total number of biodiversity units in the proposed layout post development are 15.44 habitat units and 10.73 hedgerow units. This equates to a 77.40% net gain in area habitats and a 66.16% net gain in hedgerow habitats as a result of the proposed development

- Economic benefits arising from the construction employment and use of local materials where practicable.

7.33. In conclusion, the adverse impacts of the proposed development would be minimal and would not impact the 5 principles of the Green Belt. The weight to be afforded to the Green Belt allocation should only be limited. The significant benefits that come from the scheme amount to very special circumstances in overcoming the impact on the Green Belt. The site area associated with the development is marginal within the Green Belt and it has been demonstrated that there are no available alternative sites within the Green Belt or wider urban areas or brownfield parcels within the Borough. On balance, when considering the limited spatial nature of the site within the Green Belt against the benefits of the scheme as outlined within this report, the harms caused are clearly outweighed by the benefits and therefore very special circumstances exist to justify the development.

7.34. Further support is provided by the NPPF for renewable energy development and rural diversification. The proposal leads to economic, social and environmental benefits and therefore accord with the core principles of sustainable development as outlined in Paragraph 8 of the NPPF.

Conclusion

7.35. The site is located within the Derby and Nottinghamshire Green Belt parcel. It is considered with regards to the sensitive design of the proposed development and the additional landscape mitigation proposed that the actual perceived extent of any harm to the Green Belt is limited, especially in future years as the landscape mitigation develops. This harm

should therefore be weighed accordingly alongside the benefits of the proposals, as set out in the wider analysis of the 'very special circumstances'.

7.36. Current Case Law clearly outlines that the provision of renewable energy development can be considered as very special circumstances in the determination of an application. Overall, it is considered that substantial weight should be given to the benefits of the proposal in providing the necessary renewable energy infrastructure to support the significant generation of clean renewable electricity and carbon displacement. Based on the significant weight given by national policy to the delivery of this type of development, the mitigating measures to minimise the proposals impact on the landscape, the wider environmental benefits associated with renewable energy production and the benefits to biodiversity when considered cumulatively, clearly outweigh the limited Green Belt harm and any other harm identified. This amounts to a very special circumstance in line with the NPPF.

Agricultural Land Classification

7.37. The site in its current use comprises agricultural land. The NPPF outlines that planning policies and decisions should contribute to and enhance the natural and local environment by recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services, including the economic and other benefits of the best and most versatile agricultural land.

7.38. Furthermore, Footnote 65 states, *"Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality."*

7.39. Policy 1 of the Local Plan Part 2 outlines under 'development requirements' that new development will be granted provided that, where relevant the following criteria are met:

"12. Development should have regard to the best and most versatile agricultural classification of the land, with a preference for the use of lower quality over higher quality agricultural land. Development should also aim to minimise soil disturbance as far as possible."

7.40. An Agricultural Land Classification Survey has been undertaken for the site. This report confirmed the classification of the land as follows:

Table 2: Winking Hill Proposed BESS: Summary of ALC grade distribution		
ALC Grade	Area (Ha)	% Site Area
Subgrade 3a	1.29	30
Subgrade 3b	2.95	70
Total	4.24	100

Figure 6.1 – Agricultural Land Classification

7.41. It is therefore recognised that 30% of the land comprises what is considered to be best and most versatile (BMV) land.

7.42. It is accepted that the proposed development will reduce the arable production when compared to the current use. The proposed development will reduce intensive cultivation practices and move towards the establishment of biodiversity or pollinating area for the duration of the scheme.

7.43. As identified within the Site Alternatives Study (Report Ref R001v3), the use of agricultural land to host the proposed development would be unavoidable. As such, this form of development is, with appropriate management, a temporary and reversible proposal.

7.44. The NPPF does not preclude the use of BMV land, instead it requires planning policies and decisions to 'recognise' the economic and other benefits of BMV land. It does not prohibit the loss of this land. This is the case also for Policy 1 of the Local Plan within which is it states that there is a preference for the use of lower grade agricultural land.

7.45. When considering the wider context of Rushcliffe, based on the provisional maps, the land quality of the Borough is shown below:

Grade	Description	Area (ha)	Proportion (%)
1	Excellent	0	0
2	Very Good	12,774	32.9
3	Good to Moderate	24,839	64.0
Estimated 3a	Good	9,936	25.6
Estimated 3b	Moderate	14,903	38.4
4	Poor	1,224	3.1
5	Very Poor	0	0
Total		38,837	100

7.46. This table identifies that the proportion of BMV in the Rushcliffe Borough is 58.5%. The majority of the agricultural land in the Borough is BMV quality, therefore the site with 30% of agricultural land BMV, is well below the Borough average. It is also below the national average of 42%.

7.47. The 1.29ha of the site identified as BMV in the Agricultural Land Classification Survey represents only 0.0027% of the 47,549 ha of BMV agricultural land within Rushcliffe District. This is a very insignificant temporary reduction in the available BMV agricultural land.

7.48. As such, whilst the proposed development will result in the temporary loss of agricultural land, when considered against the other significant benefits associated with the development, the planning balance makes the harm acceptable in planning terms.

7.49. It is therefore considered that the proposed development is in accordance with the relevant national policy and Policy 1 of the Local Plan Part 2.

Landscape and Visual Amenity

7.50. The site lies outside of any nationally designated landscape (National Parks, AONB) and there are no local level landscape designations identified in the adopted Rushcliffe Local Plan.

7.51. There is no public access onto the site. The only Public Right of Way (PRoW) running through the landscape surrounding the site with any potential visibility of the proposed development is Ratcliffe on Soar FP3, which runs approximately 300m to the south of the site.

7.52. A Landscape and Visual Assessment (LVA) has been prepared to accompany this planning application and confirms that the scheme can be effectively integrated and assimilated into the surrounding landscape with the adverse effects highly localised to the immediate environs only.

7.53. Overall it is considered that the proposed hedgerow, shrub and tree planting would improve the landscape framework of the site and ecological corridors along the edges of the proposed development.

7.54. Effects upon landscape character arising from the proposed development would be long-term, but the proposed development would result in some long-term beneficial landscape effects as a result of proposed species-rich wildflower grassland mixes, and new hedgerow, shrub and tree planting, which overtime would provide increased enclosure of the proposed development and reduce its influence on the surrounding landscape.

7.55. This report concludes that the proposed development has been designed with consideration to local character and has appropriate regard to its surrounding landscape setting. It recognises the site's intrinsic character and that of the wider landscape whilst seeking to improve and enhance local character and biodiversity.

7.56. During the construction and operation of the proposed development, there would inevitably be some localised effects on landscape features, character, and visual amenity. However, these effects would be limited and restricted in extent, in part due to screening by landform and existing vegetation. The addition of landscape enhancements and proposals shown on the Landscape Masterplan (Drawing Number P23-1398_EN_02D) would further assimilate the proposed development within the existing landscape framework of the site and its surroundings.

7.57. It is therefore considered that the development accords with the relevant national and local policies.

Cumulative Effects

7.58. There are two projects considered relevant to the cumulative assessment. Firstly, the recently consented Ratcliffe-on-Soar Local Development Order (LDO) which lies adjacent to the south and west of the site. Secondly, there is an application which was recently refused consent by Rushcliffe Council (Ref. No. 23/01285/FUL) for a Proposed Battery Energy Storage Facility on Land Off West Leake Lane, on the opposite side of the Lane to the Proposed Development. The extent of cumulative effects is discussed further at Section 8 of the LVA.

7.59. Overall, when the Proposed Battery Energy Storage Facility on the opposite side of West Leake Lane is also considered alongside the Proposed Development there would be no more than minor additional cumulative effects above the landscape and visual effects set out in the main assessment above.

Ecology and Biodiversity

7.60. The site is not identified as being located within a designated area for ecology. The NPPF identified that planning policy should identify and pursue opportunities for securing measurable gains for biodiversity.

7.61. Policy 17 of the Local Plan Part 1 states that the biodiversity of Rushcliffe will be increased over the Core Strategy period by:

"*c) seeking to ensure new development provides new biodiversity features and improves existing biodiversity features wherever appropriate.*"

7.62. The application is supported by a Preliminary Ecological Appraisal Report. This report summarises the potential ecological constraints to the development. This report concludes that the scheme would have a significant positive impact on biodiversity.

7.63. The Landscape Masterplan (Drawing Number P23-1398_EN_02D) shows the following enhancements including, but not limited to:

- Management and enhancement of existing boundary trees and hedgerow to enhance these landscape features;
- New mixed native hedgerow, scrub and tree planting, allowed to grow to and be maintained at a minimum height of 3m;
- Species-rich wildflower grassland to provide additional landscape and ecological enhancements on site; and
- Species-rich wildflower grassland suitable for wetlands within proposed drainage basin;

7.64. The supporting ecological appraisal outlines the biodiversity net gains that can achieved on site which are significantly more than the required net gains of 10%. The delivered net gain is significantly more than the required net gain of 10%. The total number of biodiversity units in the proposed layout post development are 15.44 habitat units and 10.73 hedgerow units. This equates to a 77.40% net gain in area habitats and a 66.16% net gain in hedgerow habitats as a result of the proposed development.

7.65. Where necessary a Construction Environment Management Plan (CEMP) can be conditioned to any planning consent.

7.66. As such, it is demonstrated that the scheme complies with Policy 17 of the Local Plan Part 1.

Heritage and Archaeology

7.67. There are no designated assets (listed buildings, conservation areas, scheduled monuments, world heritage sites, registered battlefields, registered parks and gardens) located within the site. The closest assets are located within Kingston on Soar and Thrumpton.

7.68. Policy 11 of the Local Plan Part 1 at Part 1 stipulates:

"1. Proposals and initiatives will be supported where the historic environment and heritage assets and their settings are conserved and/or enhanced in line with their interest and significance. Planning decisions will have regard to the contribution heritages assets can make to the delivery of wider social, cultural, economic and environmental objectives."

7.69. Furthermore, Policy 28 of the Local Plan Part 2 states that:

"1. Proposals that affect heritage assets will be required to demonstrate an understanding of the significance of the assets and their settings, identify the impact of the development upon them and provide clear justification for the development in order that a decision can be made as to whether the merits of the proposals for the site bring public benefits which decisively outweigh any harm arising from the proposals."

7.70. The application is supported by a Heritage Statement and associated reports which provides information with regards to the significance of the historic environment and archaeological resource on the site. The report assesses the implication of the scheme on both archaeological potential and built heritage.

7.71. It is concluded that the geophysical survey across the site did not identify any anomalies suggestive of Roman activity. As such, the potential for significant archaeological remains of Romano-British date within the site is considered to be low. The geophysical survey identified modern features across the site which are not considered to be sufficient interest to be considered heritage assets. The potential for significant archaeological remains of post-medieval to modern date within the site is considered to be low.

7.72. Finally, when considering built heritage and the setting of assets, the proposed development within the site is not considered to result in harm to any of the designated heritage assets located in the wider surrounds of the site.

7.73. As such, it is demonstrated that the scheme complies with Policy 11 of the Local Plan Part 1 and Policy 28 of the Local Plan Part 2.

Highways and Transport

7.74. During the construction phase, delivery of materials and access will be taken via West Leake Lane. This route has been identified to minimise traffic disruption during construction by avoiding local villages and is supported by an access strategy in consultation with Nottinghamshire County Council.

7.75. Whilst it is acknowledged that there will be an increase in highway movement during the construction period, it is not anticipated that outside of this time, the proposed development will accrue a high number of trips.

7.76. A Construction Traffic Management Plan and Transport Statement has been submitted in support of the application. This document sets out the framework for managing movement of traffic associated with the proposed development in order to mitigate against the effects of traffic travelling to and from the site during the construction period.

7.77. During operation, access to the site will be obtained from West Leake Lane to the eastern boundary of the site. A secondary emergency access has been included, just north of the proposed access along West Leake Lane. This access will not be used during the construction

or operation of the project, and will only be used by emergency service vehicles during an emergency.

Flood Risk and Drainage

7.78. The site is located within Food Zone 1, an area identified as being at lowest risk of flooding. Any future application will be supported by appropriate Flood Risk Assessment owing to the size of the application site. It is however acknowledged that there is an area of surface water flooding in the northeast of the site.

7.79. Policy 18 of the Local Plan Part 2 stipulates:

"*To increase the levels of water attenuation, storage and water quality, and where appropriate, development must, at an early stage in the design process, identify opportunities to incorporate a range of deliverable Sustainable Drainage Systems, appropriate to the size and type of development. The choice of drainage systems should comply with the drainage hierarchy.*

2. Planning permission will be granted for development which:

a) is appropriately located, taking account of the level of flood risk and which promotes the incorporation of appropriate mitigation measures into new development, such as sustainable drainage systems;

b) reduces the risk to homes and places of work from flooding;

c) delivers a range of community benefits including enhancing amenity (ensuring a safe environment) and providing greater resistance to the impact of climate change;

d) contributes positively to the appearance of the area;

e) accommodates and enhances biodiversity by making connections to existing Green Infrastructure assets; and

f) retains or enhances existing open drainage ditches."

7.80. The application is supported by a Flood Risk Statement and Drainage Impact Assessment (Report Ref 04875-67600028 Rev 01). An assessment of the drainage options has also been undertaken, and it has been concluded that drainage by infiltration is unlikely to be a viable option. As such, the current proposal is to drain the site via an attenuation basin, with a restricted discharge rate into the onsite drainage channel. Infiltration testing will be undertaken on site prior to detail design, and should acceptable infiltration rates be found, an infiltration solution will be adopted during detailed design.

7.81. It is proposed to use an attenuation basin to limit off-site surface water runoff from the permanent hardstanding areas on site. Ground levels on site fall to the Northwest. The proposed attenuation basin is located in the northwestern corner, such that surface water in the compound area can be conveyed into the basin naturally via a filter drain. The design of the site has been considered in such a manner to reduce the risk of surface water flooding with the battery energy storage compound located outside of the area of higher surface water flood risk. The only element of the scheme that is located within this area is an emergency access track for use by emergency services vehicles in the event that a prevailing

wind during fire at the compound results in the primary access being unusable. This track will be constructed at the level of the existing topography to ensure there is no loss of flood storage area and subsequently no increased flood risk due to the development. As discussed within the Drainage Strategy, likelihood of an adverse prevailing wind during a fire event at the compound and a flood event with an AEP (annual exceedance percentage) of 3.33% to occur at the same time is far beyond what is reasonably practicable to design for. In the unlikely event that these occurred at the same time the flood water is less than 30cm deep during the 3.33% AEP event, therefore emergency vehicles could still access the site if no alternative was available. It is therefore considered that a pragmatic approach to surface water flood risk has been taken in the design and consideration of the proposed development.

7.82. The Winking Hill Infrastructure Plan shows the proposed attenuation basin design location. The basin has been designed with a plan area and depth sufficient to accommodate storm flows generated on site during a 100-year event including an additional 40% allowance for climate change. To mitigate ground stability risk and slip / trip risk, basin slopes are limited to 1:3.

7.83. Once completed, the proposed development will increase the impermeable area slightly due to the hardstanding area of the battery compound. A surface water attenuation pond and drainage scheme will therefore be incorporated into any final development design, identified through the Surface Water Management Plan, to ensure that the risk of flooding on and off site is not increased.

7.84. With mitigation measures in place, significant impacts associated with flood risk and surface water are not anticipated.

7.85. It is therefore considered that the proposals are in accordance with the relevant requirements of the NPPF and Policy 18 of the Local Plan Part 2.

Noise

7.86. Policy 1 of the Local Plan Part 2 outlines under 'development requirements' that new development will be granted provided that, where relevant the following criteria are met:

"5. *noise attenuation is achieved and light pollution is minimised.*"

7.87. The application is supported by an Acoustic Impact Assessment (Report Reference 04875-7296858 Rev 01). This assessment has been prepared in accordance with BS 4142:2014+A1:2019.

7.88. There is likely to be some temporary noise during the construction phase of the development, largely associated with site activities and vehicle movements, however, this noise can be controlled to a negligible level through a Construction Environmental Management Plan.

7.89. Operational noise and vibration generated by the proposal is also very limited. The main sources of sound within the proposed development are from the cooling fans for the inverters housed within the PCS units, air conditioning for the BESS and the transformers. However, these emit low-level sound and as such, no significant or adverse impacts regarding noise and vibration are expected as a result of this proposal.

7.90. As detailed on the submitted Infrastructure Layout (Drawing Reference 04875-RES-LAY-DR-PT-001 Rev 4), a 4m high barrier of a suitable mass and density is proposed to be located on the western boundary of the battery storage facility.

7.91. This report concludes that the results show that noise levels resulting from the operation of the site in isolation and cumulatively will be low in the context of relevant assessment criteria and can be considered 'present and no intrusive; in terms of government policy and guidance provided within the NPSE and NPPG.

7.92. It is therefore considered that the proposed development is in accordance with Policy 1 of the Local Plan Part 2.

Other Matters

Fire Safety

7.93. The application is supported by a Fire Risk Statement (Report Ref 04875-7720144 Rev 01) that contains the key mitigation measures against which the risk of fire ignition and propagation within the site. The key principles of the NFCC Grid Scale Battery Energy Storage Planning Guidance for FRS, 2023 are addressed through the mitigations identified within this report.

7.94. Battery technology and associated understanding of fire risk is continually evolving within the industry. As such, this document sets out key principles and mitigation measures based on the current understanding of battery fire risk but does not include a detailed Fire Risk Management Plan. A detailed Fire Risk Management Plan would be developed during detailed design, following battery selection.

Crime Prevention

7.95. RES Ltd will be following the necessary national guidance to ensure the security of the future development site and the infrastructure located within the site's boundary.

7.96. The level of security provided by the proposed fencing is considered generally acceptable and need to be balanced with visual considerations. It is considered that if anything more substantial was to be installed this would not be acceptable visually.

7.97. The CCTV system proposed (as detailed on Drawing Reference 04875-RES-SEC-DR-PT-003 Rev 1) will be capable of recording clear images that will meet the standards as set out in the Home Office Publication 28/09 CCTV Operational Requirement Manual 2009 as well as the UK Police Requirement for Digital CCTV Systems 09/05. As such, it is considered that scheme meets the relevant national standards and can be maintained in a manner that will ensure the security of the scheme across the lifetime of the development.

7.98. The CCTV cameras will not face residential areas.

8. Planning Balance

8.1. To summarise, the above planning assessment has demonstrated the following:

- Notwithstanding the location within the Green Belt and in light of the demonstration of very special circumstances, this planning application is in broad compliance with the Development Plan and national planning policy and guidance. Policy compliance strongly support planning permission being granted.

- The development and operation of the BESS would give rise to a wide range of social, environmental and economic benefits which amount to a very substantial weight in favour of planning permission being granted (against what are limited effects).

- The impacts associated with the development at this location are limited, the impacts are suitably mitigated, and the proposal is in compliance with relevant issue specific planning policies in the Development Plan, so do not weigh against the development.

- The Site Alternatives Study confirms that there are no alternative sites which could accommodate the proposals within the study area.

8.2. Whilst it is accepted that the proposal will result in changes to the local environment, such as in terms of visual impact, those changes are no such that would constitute a breach of the policies contained within the Development Plan. This is also the case where any identified harm can be addressed by way of a planning condition, such as matters of landscaping, ecological mitigation and enhancement. This application, as summarised by the planning statement, has demonstrated accordance with policy and is consequently in accordance with guidance contained within the NPPF and NPPG.

8.3. Notwithstanding this accordance with the development, the change to the local environment could be perceived as being harmful, such as impacts upon the Green Belt. This statement has set out the benefits of the proposal and these are substantial in their weight (particularly in combatting climate change and meeting the ambitious targets for renewable energy production), so as to constitute very special circumstances. As such, those benefits can be regarded as further supporting the acceptability of the Proposed Development against the Development Plan or should a more pessimistic view be taken as being capable of outweighing any conflict with the Development Plan (which we do not consider there to be).

8.4. The benefits the scheme, can be listed as, but not limited to:

- Battery storage facilities are essential infrastructure to support the UK's climate change targets, in maintaining and balancing a continuous supply of energy generated from renewable sources. This flexibility approach adds resilience to energy supply and allows the storage of energy until required, creating a more efficient and reliable energy system.

- Economic benefits associated with investment and support for on-site employment during the construction period and with associated management and maintenance of the scheme.

- Appropriate biodiversity and landscape enhancement via increased boundary planting and species-rich grassland resulting in a net gain in biodiversity across the site.

8.5. In consideration of compliance with the Development Plan and other planning policy requirements, the significant benefits and limited adverse effects, resulting in very special circumstances associated with the Proposed Development it is clear that this development is, on balance, acceptable in planning terms.

8.6. The Proposed Development has been shown to achieve the main objectives of sustainable development (environmental, social and economic) without causing undue detriment to any of those matters. The presumption in favour of sustainable development set out in the NPPF there applies here. As the NPPF directs, in such circumstances and where the application complies with the Development Plan, the application should be approved without delay.

9. Conclusion

9.1. This statement has been prepared by Pegasus Group on behalf of Renewable Energy Systems Ltd in support of the accompanying application for full planning permission for the proposed Battery Energy Storage System (BESS) and Associated Infrastructure.

9.2. The development supports the UK Government's intention to move to a low carbon economy, which represents a substantial benefit. The impacts of the proposal have been shown to be acceptable and, where necessary mitigation measures have been set out to reduce potential impacts of the proposed development.

9.3. National planning policy and guidance is a material consideration in the determination of this planning application. The proposal has been shown to be in compliance with the relevant Development Plan policies.

9.4. Accordingly, this proposal represents sustainable development, and as such this planning application should be approved without delay.

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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